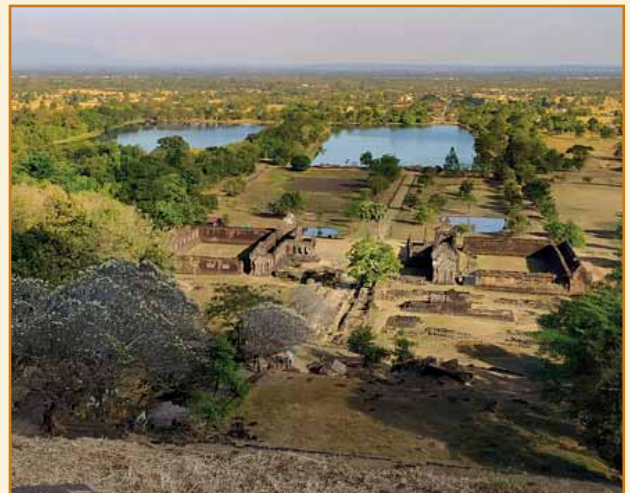


# World Heritage Watch Report 2021





World Heritage Watch

# World Heritage Watch Report 2021

Berlin 2021

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# Preface

It is in the nature of our World Heritage Watch mission to alert to risks, while there may be time for precautionary and corrective action. This year's World Heritage Watch Report has 49 contributions, almost 20% more than last year's. Should we be happy about that? On the one hand, yes, since it shows that more civil society actors than ever find it useful to have their information shared in our publication. And of course no, because the number of World Heritage sites at risk never seems to decline. And how many others are out there that we have not heard of because there is no one to write a report?

Numbers can tell only part of the story, however. We also call for an overall strengthening of the precautionary agenda for the World Heritage. Some risks and constraints seem to be calling for systemic upgrades rather than site-by-site action alone. The World Heritage system – on global, national and local level – needs quick response capabilities and systemic strengthening: decision-making based on technical expertise alone and a full appreciation, transparent and participatory management, an active civil society, reliable financing mechanisms, and a prominent position in educational curricula in all of the Convention's member countries.

To realize these goals, the World Heritage system is in dire need of funds. UNESCO itself suffers from being structurally underfunded. Likewise many sites face severe constraints for funding their protection and upkeep, and last not least the local communities deserve a perspective of sustainable development and a fair share of the benefits derived from World Heritage sites.

The World Heritage system is also in vital need of active and vigilant people on the ground. To protect sites locally, and to fight for their upkeep at the time of budget definitions and spatial planning, World Heritage would need to count on many more directly engaged, committed and knowledgeable civil society actors.

To achieve that, the existence of our global network for World Heritage still needs to be more well-known in order to inspire the formation of such groups on the local and national levels. Recently we have begun to increase our visibility in the social media, hoping that young people around the world may discover their enthusiasm for something so much worthy of our engagement.

Since World Heritage sites, and the challenges they are exposed to, are so diverse we should also link up with the diverse international campaigns focused on thematic challenges. The present report gives some graphic examples. Beyond nature conservation, there are cases related to phasing out fossil fuels, tackling climate change, keeping rivers free-flowing, supporting the rights of indigenous peoples, struggling against uranium mining and pesticides, and more. By linking up with some of the big international NGOs working in these fields we can hope to establish the World Heritage as a field of activity recognized as important as these other global concerns.

We would also greatly benefit from a global NGO that would advocate for cultural heritage. While there are about ten global NGOs fighting for concerns related to biodiversity and climate change, there is none that would alert the world when the most important monuments and historic cities on our planet are at risk. Don't the Acropolis of Athens, Stonehenge or the Taj Mahal – monuments which have truly inspired the whole world over many centuries – deserve the same support from civil society as the Serengeti or Lake Baikal? Could anyone imagine a world without them? They have become archetypes – images that structure the way we perceive the world. Hopefully World Heritage Watch can help making civil society movements for cultural heritage as strong as those for natural heritage one day. The contributions of this year's WHW Report underline again that much could be lost if people don't stand up for it.

World Heritage Watch is a network of values, commitment and communities, something that is of great importance especially to young people. We all understand that in our globalized world we are on the path to becoming global citizens. The World Heritage – our common heritage – presents a unique platform to make these ideas a reality in our lives across countries and continents, and this gives us hope that the active engagement of young people for world heritage increases chances that the sites designated by UNESCO can be preserved beyond present generations.

Berlin, May 2021

Maritta Koch-Weser, President  
Stephan Doempke, Chair

# I. Monuments and Sites



# Stonehenge, Avebury & Associated Sites Under Imminent Threat of Major Road Construction

Kate Fielden, Stonehenge Alliance <sup>[1]</sup>



The UK Government intends to widen the A303 road with an “Expressway” dual carriageway across the Stonehenge half of the World Heritage Site (WHS), placing part of the new road in a short tunnel. A brief description of the WHS, considered by UNESCO to be “a landscape without parallel”, is given in World Heritage Watch Reports for 2018 and 2019, along with an explanation of the road project and its impacts.<sup>[2]</sup> For ease of reference, a map of the scheme is reproduced here (Fig. 1).

## Examination of the road scheme

Highways England’s scheme was formally examined by a panel of five senior planning inspectors (the “Examining Authority”) from April to October 2019. Three post-examination consultations were held by the Secretary of State: on the Development Consent Order (DCO) documents and a major new discovery of a part-circle of massive pits centred on Durrington Walls henge in the northeastern sector of the WHS<sup>[3]</sup> The Examining Authority’s report and recommendation were presented to the Secretary of State for Transport on 2 January 2020. The Transport Secretary delayed his decision<sup>[4]</sup> which was published, along with the Examining Authority’s report, on 12 November 2020. The DCO was granted despite the Examining Authority’s rec-

ommendation that consent should be withheld, principally on cultural heritage grounds.

The Examination was mainly conducted in writing. Interested Parties submitted representations on the Examining Authority’s specified topics and written questions. There were site visits and several hearings which gave opportunities for individuals and Interested Parties to enlarge on their written evidence and to address the Examining Authority’s further questions. The process was not very satisfactory, since scheme supporters rarely addressed points raised by objectors who were themselves unable to cross-examine scheme supporters. The application documents and all written evidence to the Examination can be seen in the Examination Library under “Documents” on the Planning Infrastructure website.<sup>[5]</sup>

## Supporters of the scheme

The scheme applicant, Highways England, is a UK Government-owned company. The principal scheme supporters are the Government’s Department for Digital, Culture, Media and Sport (DDCMS) and key heritage bodies Historic England (Historic Buildings and Monuments Commission (England), funded

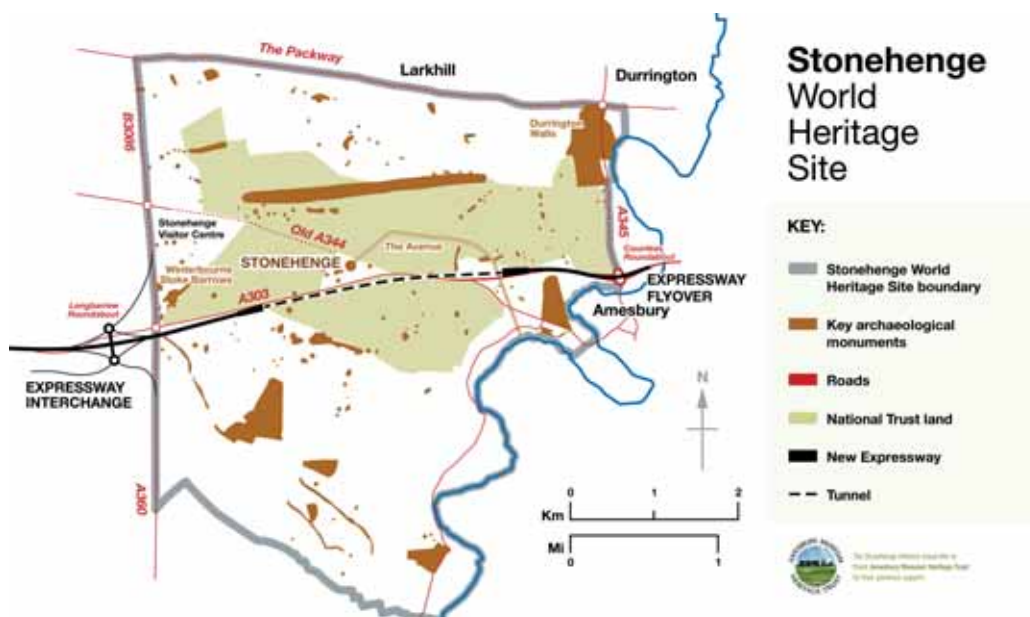


Fig. 1: Stonehenge WHS showing proposed A303 Expressway, tunnel and junctions.

Graphics: Amesbury Museum and Heritage Trust

by DDCMS); English Heritage (a charitable limited company whose sole share-owner is Historic England); the National Trust (an independent charity with major land holdings at Stonehenge substantially donated by public subscription) and the local planning authority, Wiltshire Council. These bodies have direct or indirect managerial and/or commercial interests in the WHS. All apparently agreed with Highways England that the overall impact of the scheme on the WHS would be “slight beneficial”. They do not accept that it would breach the UK Government’s obligations under the World Heritage Convention.



Fig. 2: A303 Stonehenge Examination Pre-Inquiry meeting, 1 April 2019.

Photo: Kate Freeman

## Objections to the scheme

Among those organisations and individuals participating in the Examination as objectors were ICOMOS-UK, the Council for British Archaeology, a consortium of archaeologists (independent specialists in the archaeology of the WHS), the WHS Officer, the Avebury [civic] Society and the Stonehenge Alliance.

Specialists giving expert evidence on behalf of the Stonehenge Alliance covered planning policy, cultural heritage, landscape, biodiversity, geology, hydrogeology, tranquillity, vibration, transport issues, carbon impact and value for money.<sup>[6]</sup>

- The scheme was shown not to conform with national, local and Management Plan policies for the WHS.
- The project is unlikely to achieve claimed transport and economic benefits. The National Audit Office, the UK’s independent public spending watchdog, has thrown doubts on the cost-benefit methodology used by Highways England and estimated the cost of the scheme to be between £1.5 and £2.4bn at 2016 prices.<sup>[7]</sup>
- Tranquillity at the henge would not improve with the numbers of visitors allowed.
- The potential for archaeological damage arising from vibration during tunnel boring was accepted, along with no tested method of addressing it.
- Highways England withheld hydrogeological data and was unable to convince our expert that there would be no problems with contamination of groundwater and/or ground set-

tlement in association with the tunnelling process in ground rock known to contain fissures and sinkholes.

- It was pointed out by ICOMOS-UK that Highways England, in using ICOMOS’ guidance<sup>[8]</sup> in respect of the WHS, had incorrectly balanced harmful impacts in parts of the WHS against benefits the scheme would bring to other parts.<sup>[9]</sup> It was seen by objectors that this approach had led to under-estimation of the damage overall to the WHS.

## Archaeological concerns

Specialist archaeologists raised concerns about the necessarily limited nature of archaeological evaluation and excavation for the scheme, owing to restrictions on time and cost. Evaluation work had already revealed burials and potential settlement remains within the areas of intended road engineering. Most evidence of prehistoric activity, in the form of worked flint and artefacts, is in the topsoil: even so, useful information can be gained by careful sieving of this layer so that the chronology and distribution of diagnostic material can be plotted. Such a time-consuming exercise is only worthwhile if the percentage of sieving is high – an impossibility within the timeframe of the project. Evaluation work in the western new road cutting area of the WHS has already shown potential evidence of settlement of the period just before and contemporary with the construction of Stonehenge. Furthermore, topsoil retained for landscaping in the final stages of the scheme will contain archaeological material jumbled and out of context in re-location.

## International advice

The Report to and Decision of the 2019 World Heritage Committee meeting<sup>[10]</sup> were made known to the Examining Authority during the Examination. The Committee had again advised that the scheme would impact adversely on the Site’s OUV and integrity and encouraged the State Party not to proceed with the project in its current form, urging extension of the tunnel beyond the western boundary of the WHS. The Examining Authority’s attention was drawn to the recommendations given in reports of advisory missions to Stonehenge in 2017 and 2018<sup>[11]</sup> which had also suggested pursuit of less damaging options than the scheme as proposed. This well-informed advice over some years has been consistently disregarded. The State Party’s February 2020 State of Conservation Report<sup>[12]</sup> simply says that “*alternative longer tunnel solutions at the western end of the WHS would not secure sufficient additional benefits to justify the additional costs.*”

## The Examining Authority’s conclusions<sup>[13]</sup>

The Examining Authority’s Report (ER) condemns the scheme for its seriously harmful impacts on the OUV, Integrity and Authenticity of the WHS. It noted that “*potentially serious loss of assets could occur because of the civil engineering excavation works*” (ER 5.7.308); “*the aesthetic and spiritual damage would*

*be profound and irreversible” (ER 5.7.313); and “the [new Long-barrow] Junction would, in the view of the ExA, dwarf all other individual features, including the Stones” (ER 5.7.243). The Examining Authority drew attention to “...the harm to the overall assembly of monuments, sites, and landscape through major excavations and civil engineering works, of a scale not seen before at Stonehenge. Whilst the existing roads could be removed at any time, should a satisfactory scheme be put forward, leaving little permanent effect on the cultural heritage of the Stonehenge landscape, the effects of the proposed [Long-barrow] junction would be irreversible” (ER 5.7.247).*



Fig. 3: Image of planned western tunnel entrance. The cutting, through prehistoric cemetery and settlement remains, would be 10–11m deep and 60m wide including its sloped grassed embankments.

Photo: Highways England

Amongst its observations about impacts on the cultural heritage, the Examining Authority stated:

*“...the effects of the Proposed Development on WHS OUV and the historic environment as a whole would be significantly adverse. Irreversible harm would occur, affecting the criteria for which the Stonehenge, Avebury and Associated World Heritage Site was inscribed on the World Heritage List” (ER 5.7.326).*

### Civil society activities and next steps

The Stonehenge Alliance continues to campaign against the road scheme, mainly via social media owing to Covid-19. Kate Freeman, our social media lead, has engaged widely through our Facebook, Twitter and Instagram platforms, reporting news and relevant topics of interest, including a series of videos produced by supporters giving views on the A303 scheme of leading archaeologists, historians and others such as musician Harry Shearer of Spinal Tap and WHW Chair Stephan Dömpke. Regular updates and relevant background material, including a log of widespread media coverage of the campaign, are posted on our website.

In February 2020, our worldwide petition was handed in to the UK Government at 10 Downing Street when it stood at 50,000 signatures. The petition<sup>[14]</sup> has since reached c. 200,000 signatures, around one third of which are from 147 countries (Fig. 4).



Fig. 4: Handing in the petition to 10 Downing St. on 19 February 2020.

Photo: Chris Todd

Our efforts have been conspicuously ignored by the politicians. In case there might be a decision to proceed with the scheme, individual supporters of the Alliance set up Save Stonehenge WHS, an independent, limited company, to make it easier to mount a legal challenge.

Following the Transport Secretary's decision, the company applied for a judicial review in December 2020. A crowdfunder appeal [15] has been set up to cover the costs of the legal challenge. Over £60,000 has already been generously donated by supporters towards a target of £80,000. A three-day High Court hearing will take place in June 2021, in advance of the World Heritage Committee's meeting in July<sup>[16]</sup> The outcome of the hearing should be known later this year.



Fig. 5: “Live streaming of Stonehenge for everyone forever?”

After a satirical image published by Heritage Action in online Heritage Journal, 6 November 2020.

### What could the World Heritage Authorities do to help?

The Stonehenge Alliance and supporters have been constantly encouraged by the response to the A303 Stonehenge scheme proposals of the World Heritage Centre, its specialist advisers and the World Heritage Committee. We are naturally disappointed that their principal direction has so far been disregarded by the UK Government but until the work actually goes



ahead on the ground, there is still a chance for a change of mind. We believe that such an about-turn might be achieved, were the World Heritage Committee to place Stonehenge, Avebury and Associated Sites on the List of World Heritage in Danger. We respectfully request that this option might be considered at the 44<sup>th</sup> Committee meeting. International condemnation would send shock waves to the UK heritage sector and perhaps persuade the UK Government to listen to UNESCO.

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# Malta's Ġgantija Temple: Threat to One of the World's Most Ancient Buildings

Dawn Adrienne-Saliba, Malta-ARCH,  
Astrid Vella, Flimkien għal Ambjent Aħjar



The Ġgantija Temples (Fig. 1) are celebrated as among the oldest, most majestic freestanding structures of the world. Originating circa 3,600–3,200 BCE, they are beautiful in scope, sublime in stature, and form a central icon of Malta's archaeological heritage. The walls of these two adjacent temples at times reach a staggering height of over 7m (Trump 2003), a feat that is awe-inspiring even today, let alone during Malta's Late Neolithic. Ġgantija is among Malta's six ancient temple sites that have received distinctive UNESCO World Heritage protection (Heritage Malta 2021), yet its immediate environs and skyline are under threat.



Fig. 1: Ġgantija Temple.

Photo: Heritage Malta 2021

## Threat to Ġgantija

A proposal to build a five-storey block of 31 flats and 20 underground garages less than 200m from Ġgantija (Fig. 2) has been submitted by developer Emmanuel Farrugia (Schembri 2021).

Interrupting this view with a high, modern building would be a major disruption to the ancient skyline, particularly problematic as such views have been destroyed elsewhere in Malta. Although the developers have not, as required, submitted a photomontage of their proposed development (Sagona, 2021), such a building would extend above the iconic temple skyline (Fig. 3).

The development threatens not only the local and international visitors' enjoyment of the site and obstructs vital archaeologi-



Fig. 2: The proposed block is in direct visibility of the temple. Source: Galea-Debono 2021

cal research into Late Neolithic Malta. As the southern edge of the Xagħra plateau is unique for its concentration of prehistoric sites (Santa Verna, Xagħra Circle, Ta'Gesu, as well as Ġgantija), the preservation of this view is particularly important. Additionally, the building would be situated upon high ground near the same level as the 18th century Ta' Kola Windmill and the 19th century basilica, causing both eyesore and cultural upheaval.





Fig. 3: In its proposed position, the block would loom high over the temple.

Source: Kington 2021

This project has an impact on the wider archaeological landscape, extending beyond the immediate temple and into the threatened area. Malone, the leader of the FRAGSUS project that investigated Late Neolithic archaeological data in Xagħra warns: “This narrow lane is wholly unsuit-

able for large-scale development; road access is already compromised and dangerous”. FRAGSUS’s Stoddart also maintains that surface and geophysical surveys all around the proposed area have unearthed valuable archaeological deposits. In Volume II of the recently published FRAGSUS study of prehistoric Malta, archaeologists conducted Ground Penetrating Radar and electrical resistivity surveys that point to important remains found in Ġgantija’s immediate environs — some situated directly in the area threatened by this proposed development (Fig. 4).

Worse, the project would also require destruction of a traditional vernacular building and require 1,100 square metres of excavation for the basement-level garages, resulting in the removal of untouched soils that highly likely contain archaeological evidence.

Although the land managed by Heritage Malta may itself remain untouched, the archaeology, as recorded by the Cambridge Gozo survey and the FRAGSUS Project (Fragility and Sustainability in Restricted Island Environments), extends well beyond those boundaries. Important information regarding Ġgantija’s larger archaeological context, notably the rich soils which sustained the prehistoric inhabitants, would be reduced, as would the opportunity to learn more about the Neolithic settlements.

Over the past month, this proposal has garnered over 1,800 objection letters to the Planning Authority, “drawing international press condemnation as ‘a tragedy and a sign of pure greed’” (Vella 2021).

Official objections from Malta’s Environment and Resources Authority and the Superintendence of Cultural Heritage have been filed. The mayor of Xagħra publicly stated: “This application appears to violate planning policies and runs counter to everything that the temple stands for” (Kington 2021). Heritage Malta has been taking action with regards to this threat to Ġgantija: “As part of a National Agency directly responsible for the protection of the Megalithic Temples of Malta UNESCO World Heritage Site, we have already submitted our objections to the proposed development in question through the official legal channels” (Stroud 2021).

As the FRAGSUS team notes: “Geophysical survey in the olive grove to the northeast of the site enabled a small trench to be excavated to test anomalies. Excavations in two further locations found evidence for additional megalithic structures surrounding the southern aspect of the site and provided important insights into the nature of the environs, notably the horticultural soils, of the main temple structure” (Brogan et al.



Fig. 4: Geophysical surveys conducted near the threatened area.

Graphic source: Brogan, et al. 2020



Fig. 5: Exploratory Trench near an olive grove.

Photo source: Brogan et al. 2020

2020). The photo above (Fig. 5) shows the top of a wall being excavated. The significance of these finds needs immediate analysis — any development in this area runs the risk of destroying critical vital information.

Although Emmanuel Farrugia, the developer who submitted the application, claims that no rock cutting on the site would take place (Kington 2021), it is the remains within the soil and even the soil itself that is of most concern. Deep soil is rare in Malta and protects ancient artefacts and biofacts (Stoddart 2021). Stone tools, pottery, human and animal remains, macrobotanical and palynological remains, mollusc shells, evidence of running water — such remains are very likely situated within the soil near the olive grove and can yield irretrievable information about this ancient civilization. Additionally, Ġgantija is uniquely situated over a geological fault and major spring. Disturbance of the surroundings would likely affect groundwater flow, further disturbing the archaeological information contained near the olive grove soil.

Last August a prehistoric mass grave containing human remains and grave goods was discovered close to this area. FRAGSUS archaeologists note that as the area is dense with such early rock cut tombs, they expect further tombs to be encountered in the development area. Suspiciously, during this find, the Superintendent of Cultural Heritage was publicly noted as having difficulties “with the boom in the construction industry [as] the cultural monitor had not grown in tandem to keep up with it” (Arena 2020). Shortly after this statement, the Superintendent was removed without explanation, prompting an outcry of academics, who published an open letter to the Heritage Minister (Delia 2020).

This area needs to be preserved and studied, not destroyed because a developer wishes to build flats. As Malone states, “No amount of archaeological recording or intervention can mitigate such a loss”. MALTA-ARCH elaborates: “We need to send a message to the Planning Authority that their task is to protect this nation’s land and ancestral heritage — not facilitate those who would destroy it. All must be held responsible for their actions. We simply cannot allow this temple’s environment, one which has been preserved for over 5,500 years, to be destroyed in a matter of seconds with a stroke of a callous pen” (Adrienne-Saliba 2021).

### Buffer Zone issue

Ġgantija has been granted high OUV status through UNESCO due to its “originality, complexity and striking massive proportions” (UNESCO 2007). Therefore, the temple is subject to the Cultural Heritage Act (2002), which provides for it to be protected by a surrounding buffer zone, and “subject to wide-ranging restrictions of building development”. However, the extension of this buffer zone is left in the hands of the national government. UNESCO admits the problematics: “An important challenge is to establish more rigorous control aimed at mitigating visual impact caused by building development in the vicinity of the buffer zones” (2007).

The 2009 Management Plan for the Megalithic Temples of Malta that covers Ġgantija also admits that development planning in Malta “is relatively weak in terms of mitigating visual impacts and protecting view sheds. As a result, megalithic sites located close to buffer zones have often sustained a negative visual impact caused by building development in the vicinity. In order to prevent a further deterioration of the setting of these monuments, more rigorous control aimed specifically at mitigating visual impact is required”. The Buffer Zone established in 2014 skirts the façade of the development site which is just 22m from the olive grove excavation area (Fig. 4) and the evidence of additional megalithic structures (Fig.5).

The 2015 report on the Megalithic Temples of Malta to the International Council on Monuments and Sites proposed a buffer zone of 33 hectares (Fig. 6). The report references contentions regarding these zones, resulting in ICOMOS’s recommendation “that details of all these contentious proposals should be submitted to the World Heritage Centre together with the outcomes of the review of the Local Plans”. The World Heritage Committee then adopted decision 38COM 8B.53, including a directive to “[s]trengthen the site-specific development limitation (particularly height limitation)”. They further emphasized that height limitations should not impact Ġgantija’s view shed, which should be “protected from the adverse impact of future development”.

Malta’s Planning Authority is supposed to take into consideration the recommendation of the Environment Resources Au-



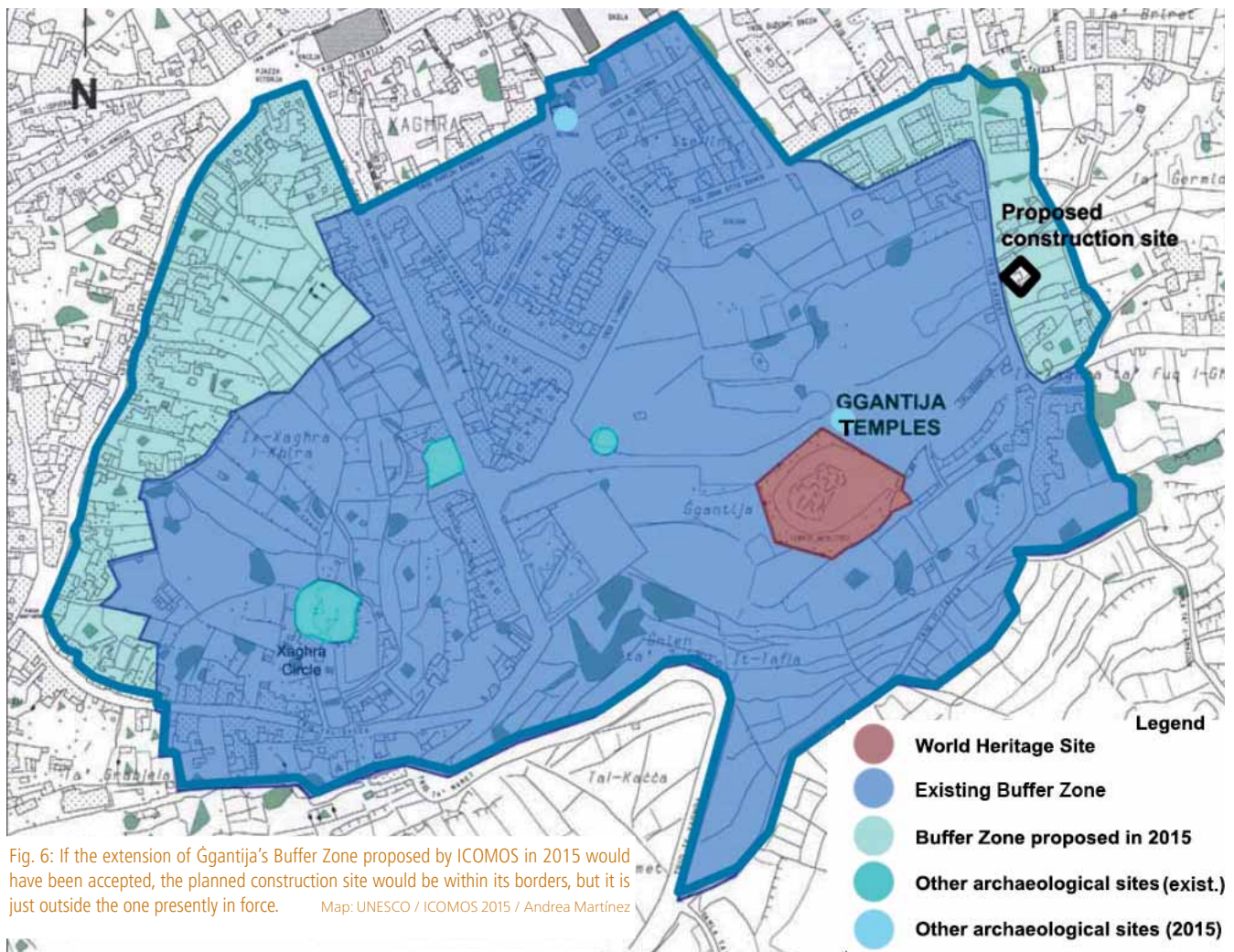


Fig. 6: If the extension of Ġgantija's Buffer Zone proposed by ICOMOS in 2015 would have been accepted, the planned construction site would be within its borders, but it is just outside the one presently in force. Map: UNESCO / ICOMOS 2015 / Andrea Martínez

thority and the Superintendence of Cultural Heritage in consultation with Heritage Malta — all of whom have objected to this development. However, Malta's PA increasingly does not consider these recommendations; this year has seen an onslaught of works throughout the islands causing environmental and cultural degradation. In some cases, developers start proceeding with works without even a permit.

### Recommendations and requests

We request that Ġgantija's management plan should be strengthened, and buffer zone regulation must be specific about height, volume, and facades of buildings. Caroline Malone, who created the Stonehenge/Avebury listing for UNESCO, recommends that "the buffer zone be strengthened for lines of sight, as this is standard practice for other listings". The buffer zone should also be redefined on the ground in the light of fresh scientific research, most prominently the work of the FRAGSUS project, since the original listing of Ġgantija. We also request a moratorium on permits within a significantly extended protective buffer zone.

Malta's NGO, Flimkien għal Ambjent Aħjar (FAA), has been leading the drive for Constitutional Reform for years, specifically re-

questing "that a separate chapter is added to the Constitution specifically dealing with the protection of Malta's heritage, environment, archaeology and historic landscapes in such a way that this protection is ensured and enforceable by the necessary structures, administrative resources and effective legal remedies" (FAA 2019; Vella 2019). This reform is long overdue.

FAA maintains that the proposed development violates a plethora of Maltese planning regulations and policies. It violates the very heritage protection enshrined in Clause 9 of Malta's Constitution: "The State shall safeguard the landscape and the historical and artistic patrimony of the Nation". In view of the fact that the Planning Authority has approved other developments on archaeological sites in violation of planning and heritage regulations, we call on UNESCO to impress upon the Maltese Authorities that granting a permit would not just seriously jeopardize Ġgantija's standing, but also threaten lesser-known unprotected sites, such as tal-Qares in Mosta, which is being bulldozed over as we write this (Adrienne-Saliba 2021).

In order to protect our archaeological and cultural heritage, we call for Clause 9 of the Constitution to be made enforceable in a court of law — presently such legal action is not possible, which is unconscionable.

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# Mdina's Citadel Fortifications, Malta, in Urgent Need of Protection

Jorg Sicot, Flimkien għal Ambjent Aħjar



The fortified city of Mdina (Citta' Vecchia) has been included in Malta's Tentative List for inscription as a UNESCO World Heritage Site in 1998, owing to its historical, architectural and cultural significance.

The Superintendence of Cultural Heritage of Malta declares the site to be in close vicinity of scheduled archaeological remains, namely:

- a) The remains of a Roman Wall and structural remains,
- b) a Scheduled Railway Tunnel, which runs partly underneath the site, and
- c) a Rostrum (Loggatal-Palju) in immediate proximity of the site.

An 81-room hotel has been proposed parts of which will extend into areas of this archaeologically sensitive site. Furthermore, excavations and construction as proposed in the process will impact the Mdina fortifications, bastions, glacis and complex buttressing system including the historical retaining wall within the site.

## Integrity and authenticity of the Mdina site (Citta' Vecchia)

Mdina is situated high above terraced fields, thus dominating the rural skyline. The terraced fields surrounding the imposing bastion walls have been carefully engineered to strengthen the bastions. Mdina contributes greatly to the glorious heritage of the Maltese Islands with its original setting of Baroque palaces and churches and so it deserves every degree of protection possible to ensure its survival for the benefit of both future generations and national pride. The urban form it was built upon is the one still standing to the present day.

The history of this township has been archaeologically documented to date back to the Bronze Age, even though no major structural remains pertaining to this period have been located yet. The arrival of Phoenician colonizers on the Maltese Islands in the 8th Century BC gave added impetus to this particular settlement, which developed in importance far more than any of the surrounding Bronze Age settlements. By Hellenistic / Early Roman times – 5<sup>th</sup> to 1<sup>st</sup> Centuries BC – the township had de-



Fig. 1: Location of the proposed hotel construction just below the Mdina bastion.

Photo: Google Earth / FAA

veloped tremendously, covering an area which is considerably larger than the current extent of Mdina as visible today.

The defenses of Mdina were entirely re-modeled in the middle-ages in conformity with the medieval defensive practices of the period – this included the use of dry ditches, square and round towers, barbicans, drawbridges etc. Most of these medieval defenses are no longer visible, but survive as part of the town's archaeological record. The Rabat and Mdina areas have also being proposed to be designated as an Area of Archaeological Importance, and an Urban Conservation Area due to their historical and architectural character.

### Detailed description of the investor project

The developer proposes construction of a five star hotel with 81 guest rooms spread over 4 terraced floors and 1 recessed floor, ancillary facilities (restaurants, conference area, two pools at roof level, landscaping works, entrance forecourt and service areas. The proposed development intends to construct a part of the hotel around the existing bastion wall found within the site, and thus directly impacting the protected historic fabric. A 1.5 meter buffer zone around the bastion wall is being proposed; however this intervention disrespects and suffocates its significance.

The development proposal will have a huge impact upon the skyline of the tentative Mdina World Heritage Site and the overall setting and approach. Views and vistas are to be preserved and strengthened, since this development involves a site which is immediately contiguous to the Mdina Fortifications. It proposes a large built-up footprint and it involves excavation on the site, which includes large tracts of archaeological and historical remains.



Fig. 2: A rendering of the proposed hotel shows that it will obscure views of the Bastion.

Source: [www.pa.org.mt](http://www.pa.org.mt)

### The proposed project violates the Outstanding Universal Value of the Property

No presentation, geological analysis or survey is available, detailing specific types of archaeological heritage on the site. No systematic approach to the integration of archaeological heritage (visible or underground) has been undertaken, no acknowledgement of archaeological heritage as Mdinas spatial and development resource is given. The protection of archaeological heritage is not regulated specifically.

There is a symptomatic lack of interdisciplinary cooperation between experts (archaeologists, conservators, urban and spatial planners), and other participants in the complex issue of preserving architectural/archaeological heritage in an urban context, as well as the failure to recognize archaeological heritage as a non-renewable spatial resource.

### Development Proposal Status

The proposal is currently under review by the Planning Authority of Malta – Case No. PA 08734/18, and a recommendation for approval of the application has been given. No works have begun on site. The final approval is likely to be voted on 29 April 2021.

#### Demands from the Maltese authorities

1. To conduct a detailed analysis of the site in question, and to establish the archaeological heritage within it.
2. To ensure that a Content and Spatial Reinterpretation of the archaeological heritage must be included in any development proposal in proximity of a UNESCO World Heritage Site.
3. As a Best Practice in World Heritage, to enforce integral actions in any development proposal in proximity of a UNESCO World Heritage Site, be it tentative or nominated.
4. To conduct an analysis of urban integration with immovable archaeological heritage, and the relation between urban planning and in situ preservation of archaeological heritage.
5. To ensure the enforcement of interdisciplinary cooperation between experts (archaeologists, conservators, urban and spatial planners), and other participants, and to preserve architectural/archaeological heritage in an urban context.
6. To adopt an Action Plan for Mdina, with a Buffer Zone included, based on the principles of prevention and preparedness, and enforceable by law.
7. To adopt a formal recognition of archaeological heritage as a non-renewable spatial resource.

# The Acropolis of Athens in Peril

Tasos Tanoulas, Acropolis:SOS

At the end of October 2020, on one of my frequent visits to the Acropolis, I was taken by surprise witnessing that the whole of the plateau was in the process of being paved with reinforced concrete, covering over much of the face of the living rock. Official statements which followed the first criticisms of these works justified these extensive interventions as ostensibly nothing more than a repair and upgrade of the older pathways to accommodate people with disabilities, but the sheer scale of the work makes clear that the primary plan is to accommodate even larger crowds of summer tourists.

Objections were expressed about the materials being used, the extent of the works and the aesthetic impact of the interventions, which appear to compete with and diminish the architectural and sculptural achievements of the monuments, and in general devalue the archaeological site as a whole. The older pavement was planned for and achieved the aesthetic integration with the surrounding rock surface and, also, “reversability”, which means that it could be completely removed without problems (see Fig. 1 and 2, p. 23).

The new installation has nothing to do with the older implementation. It is made of concrete reinforced with metal mesh, the removal of which in the future will require the use of mechanical means and, in practice, will cause injury to the rock (see Fig. 3 and 3a, p. 24). Already, on the surface of the rock west of the Parthenon, abrasions and cracks were caused by the recent removal of the massive foundation of the crane that had been erected at this place (see Fig. 4, p. 24).

The area and volume of the construction are incomparably larger than that of the old one, and the geometric configuration with straight contours and clean prismatic edges is completely foreign to the environment of the archaeological site and the monuments. The entire surface of the ancient pathway is covered, and the boundaries of the new construction suffocate the outline of carvings from monuments of antiquity. The palimpsest of the Acropolis rock, which is a monument in itself, is now covered with a “raster”, leaving the four standing monuments in a suffocating loneliness and, at the same time, eliminate the access to the connective tissue between the remains of the monuments from which the foundations are mainly saved (Braumoneion, Chalkonhiki, Archaio Naos of Athena,

etc.). The monuments lose their vital environment that allows both experts and ordinary visitors to perceive the archaeological site as a unit (see Fig. 5 – 11, p. 24–25).

These interventions were also criticized for being irreversible and for the damage they have already caused to remains of ancient architecture (see Fig. 12 – 17, p. 26) and to the rock itself (see Fig. 4), as well as the predictable – but apparently unplanned for – consequence that the type of concrete and its final coating with waterproofing chemicals will cause flooding and other problems for the rainwater drainage systems.

Rain in December 2020 caused flooding across the archaeological site of the Acropolis, a consequence of the new paving which had already been predicted by the critics. Outcry against the new pathways intensified when images of the waterlogged monuments became public. At the same time, it also emerged that the configuration of the new pathways would not ultimately fulfil the stated justification of accessibility, which was allowing the independent movement of wheel-chairs and people with disabilities.

One would expect a more careful and thoughtful handling of the situation by the Ministry of Culture. On the contrary, the President of the Committee for the Preservation of the Acropolis Monuments announced that the above works represented just the first phase of an even larger and more radical transformation of the site: new platforms would be constructed, in the form of earth terraces, on different levels supposedly replicating those of the ancient terraces in the 5th century BC. The objective would be to restore, according to his own judgement, the configuration of the ground level in the 5th century BC, and the “correct appearance” of the monuments. This levelling will bury the surviving vestiges of the ancient buildings in between the major monuments (see Fig. 18–20, p. 26–27).

Objections were, then, expressed that the installation of all these new buildings and interventions would erase any sense of historic unity and continuity, imposing modern forms for which there is no sufficient evidence, while simultaneously cutting off access to the important archaeological vestiges surviving *in situ*.



In addition to all these problems raised by essential theoretical, scientific and practical issues, all these new constructions underway, not to mention the future ones, have been implemented by entirely circumventing international and national Greek legal frameworks and institutional standards.

To the general outcry, the Ministry of Culture and the proponents of these projects answered with a sudden distraction. Instead of continuing the projected works on the Acropolis plateau, they moved activity on the west slope of the rock. On February 2, a proposal of the Committee for the Preservation of the Acropolis Monuments characterized as urgent, was brought for discussion to the Central Archaeological Council of the Ministry of Culture. The professed purpose of the proposal was the "restoration" of the west access of the Acropolis, something that would "render back" the "monumentality" and "authenticity" of the Monument, while, at the same time, "would solve problems regarding the management of the traffic of the visitors" (phrases in quotation marks are from press releases of the Ministry of Culture). The proposal was approved by general vote, even though the Central Archaeological Council examines and decides only on completed studies, and not mere proposals. In this case too, the normal procedure was sidestepped.

More specifically, a press release of the Ministry of Culture and Sports declared that a flight of new marble steps will be constructed, modeled upon a Roman flight of steps of the 1st century AD. The result will be a stepped square starting at the lower end of the west slope of the Acropolis and ascending up to the west front of the Propylaia, which will allow crowds of tourists to enter in between the columns and pass through the monument in order to, finally, get to the Acropolis plateau (see Fig. 20). The passage of tourists through the Propylaia will cause congestion on the way in and out of the Acropolis plateau, and will endanger the safety of the monument while overcrowding of visitors will persist and, in fact, will become more acute. It has not been explained why the 1st c. AD phase has been chosen for the "reconstruction" of the west access of the Acropolis, while for the Acropolis plateau, the 5th c. BC has been chosen. It seems that these choices are aiming at a selective image of "Ancient Glories"!

It is certain that these new interventions will change dramatically the form of the Acropolis Monument, and its content in the international consciousness. They do not respond to the internationally recognized and established principles concerning the preservation, conservation and safeguarding of antiquities. On the contrary, they equal the devaluation, concealment and degradation of the greatest archaeological and artistic treasure that has been bequeathed to modern Greece, in whom humanity entrusts its safeguarding.

The Acropolis is a UNESCO World Heritage Monument, answering the highest possible number of Criteria, that is, five: Criteria

(i)–(iv) and Criterion (vi). I believe that four of these criteria will be irrevocably eliminated, as will be explained:

**Criterion (i):** *The Athenian Acropolis is the supreme expression of the adaptation of architecture to a natural site ....*

This quality will be annihilated when the living rock of the Acropolis plateau and the ancient traces on it will be completely covered by a gigantic surface of horizontal terraces in new material. Similar will be the fate of the rock and the preserved ancient traces at the western slope before the Propylaia, which will be covered by a stepped staircase, also in new material. This intervention will result in the degradation of the natural landscape, and a devaluation of the rock as a natural monument in its own right, as a natural fort.

**Criterion (iii):** *From myth to institutionalized cult, the Athenian Acropolis, ... bears a unique testimony to the religions of ancient Greece. It is the sacred temple from which sprung fundamental legends about the city. Beginning in the 6th century BC, myths and beliefs gave rise to temples, altars and votives corresponding to an extreme diversity of cults, which have brought us the Athenian religion in all its richness and complexity ...*

Covering completely the living rock and the traces that are preserved on its surface, will eliminate this criterion, by making inaccessible the evidence of the primitive cults on the Acropolis, related to chthonic deities that is, deities born from the earth. These cults and the relevant traces on the rock were very important testimonies of the autochthony of the Athenians, a quality of which the Athenians were very proud. They claimed that being born by the land of Attica, made them superior to the Spartans who were immigrants from the north.

**Criterion (iv):** *The Athenian Acropolis is an outstanding example of an architectural ensemble illustrating significant historical phases since the 16th century BC. ...*

This criterion will also be abolished, since the new massive structures on the plateau and the west slope of the Acropolis will demand raising the existing ground level, often by more than 3 meters. For the support of the steps and the consolidation of the extensive new structure, massive and densely distributed foundations will have to be built, which will have to rest on the rock and on antiquities and will cover over and conceal permanently antiquities of many historical periods, both before and after the 1st c. AD.

**Criterion (vi):** *The Athenian Acropolis is directly and tangibly associated with events and ideas that have never faded over the course of history. ...*

I believe that this criterion will be also essentially damaged. The massive new structures, in their incongruous, aggressive newness, by depriving humans of the tangible elements from the past, will inactivate the creative ability of the mind and memory to recreate those events and ideas.

In addition, the **authenticity** of the Acropolis hill will be irrevocably damaged since the new interventions, being totally a modern irreversible structure, are in contradiction to the Venice Charter.

The lockdown imposed because of the corona virus pandemic served as a smokescreen for the completion of the first phase of the works which was the paving of the pathways with reinforced concrete. These activities were covered with secrecy. Considering the damages to the living rock and to ancient structures which have been documented in photographs before the lockdown (see Fig. 12 – 17), it is inevitable to suspect that all this secrecy was to conceal actions which would cause even more criticism. One has to keep in mind that, if the sight of the recent armed concrete pathways on the Acropolis is a shock to an objective visitor, they represent only a tiny portion of the future project that has been announced.

The recent works on the Acropolis and those planned for the future are inscribed in the frame of policies which are interested not in the welfare of the monuments but in their economic potential. There is no doubt that the accommodation of people with disabilities was simply a pretext for works really meant to serve the burgeoning tourist industry of recent years and the resultant need to move large numbers of visitors within limited space and timescales. Any structural implementations that would replace the existing ones for the accommodation

of the tourists, including people with disabilities, should not reconstruct structural phases responding to completely different functions and demands of past times. They should reflect the philosophy and the principles of our era. However, the solution to the problems from the growing number of visitors is not the ever-increasing accumulation of more material structures on the Acropolis. The first sound and feasible decision that should have been taken a long time ago, should be about the control of the number of visitors: tourists should not come all together in torrents between the four or five peak hours; on the contrary, visits should be arranged by appointment and be distributed during the whole length of the opening hours of the site.

Depriving the Acropolis of its quality as a well-established document of the diverse cultural expressions of both the historic period that created it and the historic periods that followed, preserving the successive traces of each, will irrevocably erase its historic unity and continuity, thus degrading it to a common piece of public property that could be easily expropriated for the profit of individuals.

**Considering all the above, I beg UNESCO to immediately**

- Take action to stop activities on the Acropolis.
- Put the Acropolis on the List of World Heritage in Danger.
- Require a Tourism Plan for the Acropolis before any future activity on the site.

## Photographic Documentation

All photos by Tasos Tanoulas unless otherwise indicated.



Fig. 1: The Acropolis rock between the Propylaia and the NE corner of the Parthenon cleared from the disjecta membra in 1977. View from the top of the east front of the Propylaia.



Fig. 2: The Acropolis rock between the Propylaia and the NE corner of the Parthenon just before the completion of the paving of the Panathenaic way under the direction of John Travlos, 1977. View from the top of the east front of the Propylaia.





Fig. 3: The area in front of the east front of the Propylaea, in the process of being paved with reinforced concrete, covering over the face of the living rock, October 29, 2020. View from the top of the east front of the Propylaea.



Fig. 3a: The area in front of the east front of the Propylaea, in the process of being paved with reinforced concrete, covering over the face of the living rock, October 29, 2020. View from the northeast corner of the platform. Above left, the west end of the Parthenon.

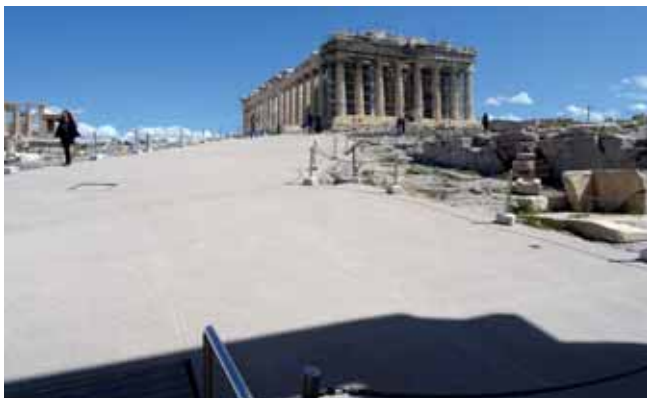


Fig. 5: The platform in front of the east front of the Propylaea, looking east, March 22, 2021. The Parthenon on the right, the Erechtheion on the left. FIG. 3 and FIG. 3a show this area under construction.



Fig. 4: The area in front of the west front of the Parthenon, view from the west steps of the monument. An impact drill is breaking the massive concrete foundation of the crane that had been erected in this place. Metal panel close the view from the outside.



Fig. 6: The platform in front of the east front of the Propylaia, seen from the south-east, March 2021.

Photo: Nikos Kazeros



Fig. 7: A view of the north Acropolis wall from the south, March 22, 2021. In the lower level the cement pathway serving the elevator that is accessible by means of the metal bridge on the left. On the right, the Erechtheion.



Fig. 8: On the left, the pathway along the north side of the Parthenon, showing a high vertical border to the north, March 2021. Above right, the east front of the Propylaia.

Photo: Nikos Kazeros



Fig. 9: The south border of the pathway discussed in the previous picture, framing the irregular outline of the living rock, March 22, 2021. On top of the picture, the north colonnade of the Parthenon.



Fig. 10: View of the cement platform in front of the east front of the Parthenon, looking from the northern end to the south, March 2021. Above right, the southeast corner of the Parthenon.

Photo: Nikos Kazeros

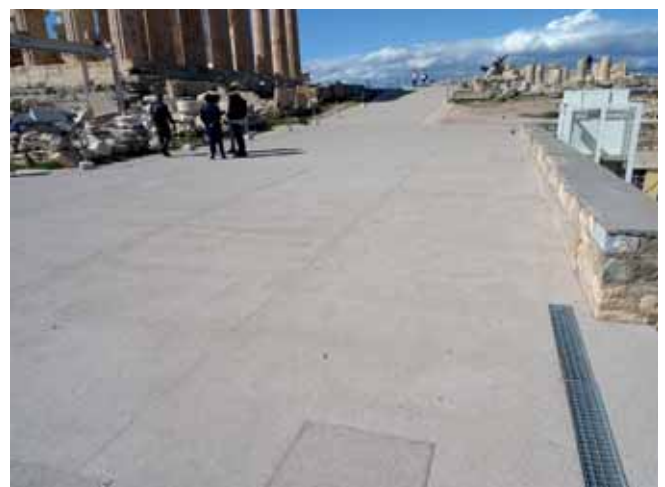


Fig. 11: View of the cement platform in front of the east front of the Parthenon, looking from the south end to the north, March 22, 2021. Above left, the east front of the Parthenon.





Fig. 12: The red arrows indicate the projecting parts of a poros block, projecting from the wall of a Byzantine cistern, into which parts of the original poros ashlar masonry had been incorporated in a remote past. 2020



Fig. 13: The red arrows indicate the same poros block, cut back in order to provide a uniform vertical surface, thus facilitating the installation of a massive reinforced concrete foundation. 2020



Fig. 14: Preparation of the formwork in front of the wall shown in Fig. 4 and Fig. 5. 2020



Fig. 15 and Fig. 16: Two views of the completed formwork, after the installation of the metal reinforcement, before being filled with cement. This massive iron and concrete structure is closely surrounded by ancient structures. 2020



Fig. 17: The upper surface of the completed foundation appears on the right half at the bottom of the picture, below the massive metal posts supporting the bridge. It seems to be a thin layer of concrete, but it really is about two meters deep.



Fig. 18: Digital photomosaic plan of the Acropolis plateau. Source: Greek Ministry of Culture and Sports



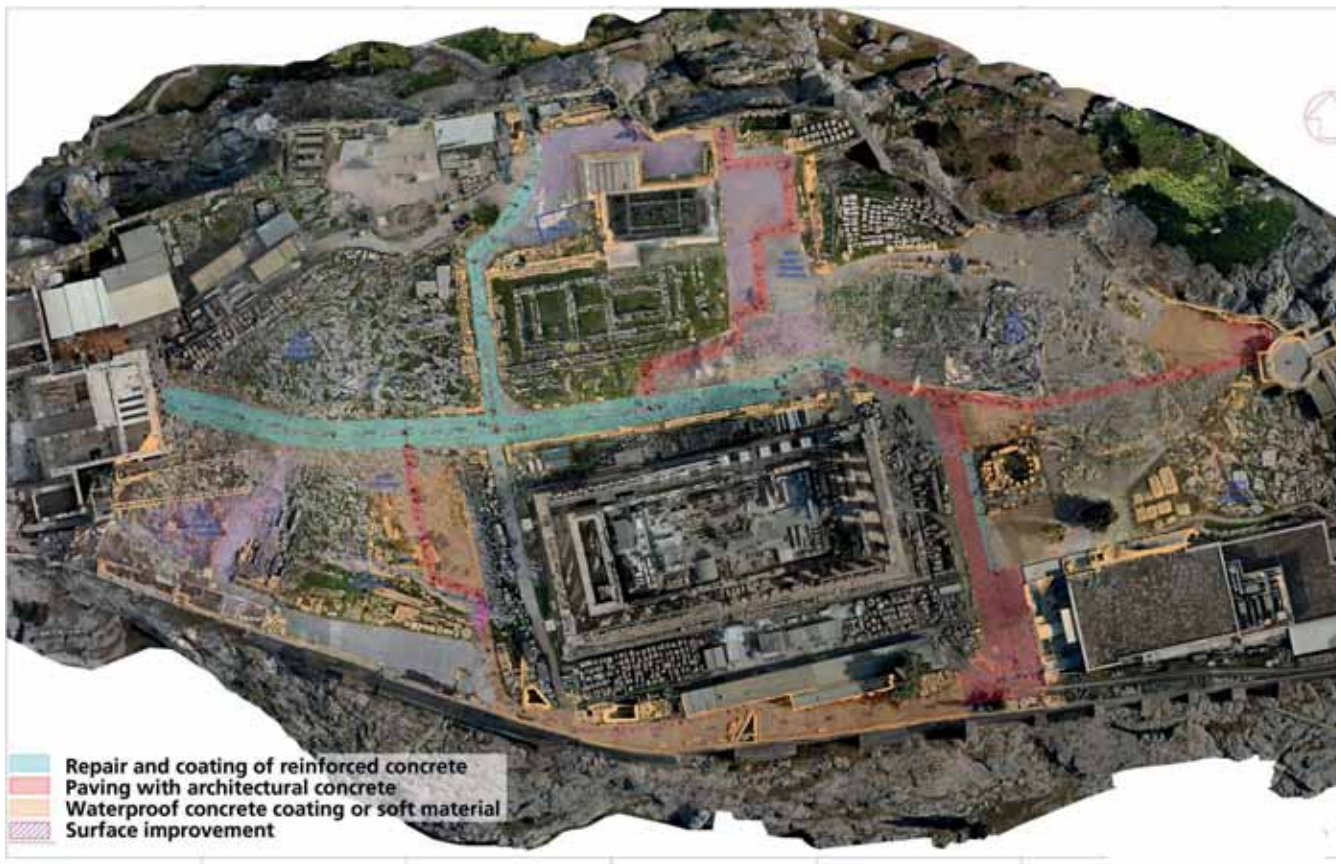


Fig. 19: Digital photomosaic view of the Acropolis plateau, indicating the new pathways. The light green and most of the light red areas have been completed in reinforced concrete. The orange and light purple are to be constructed.  
 Source: Greek Ministry of Culture and Sports

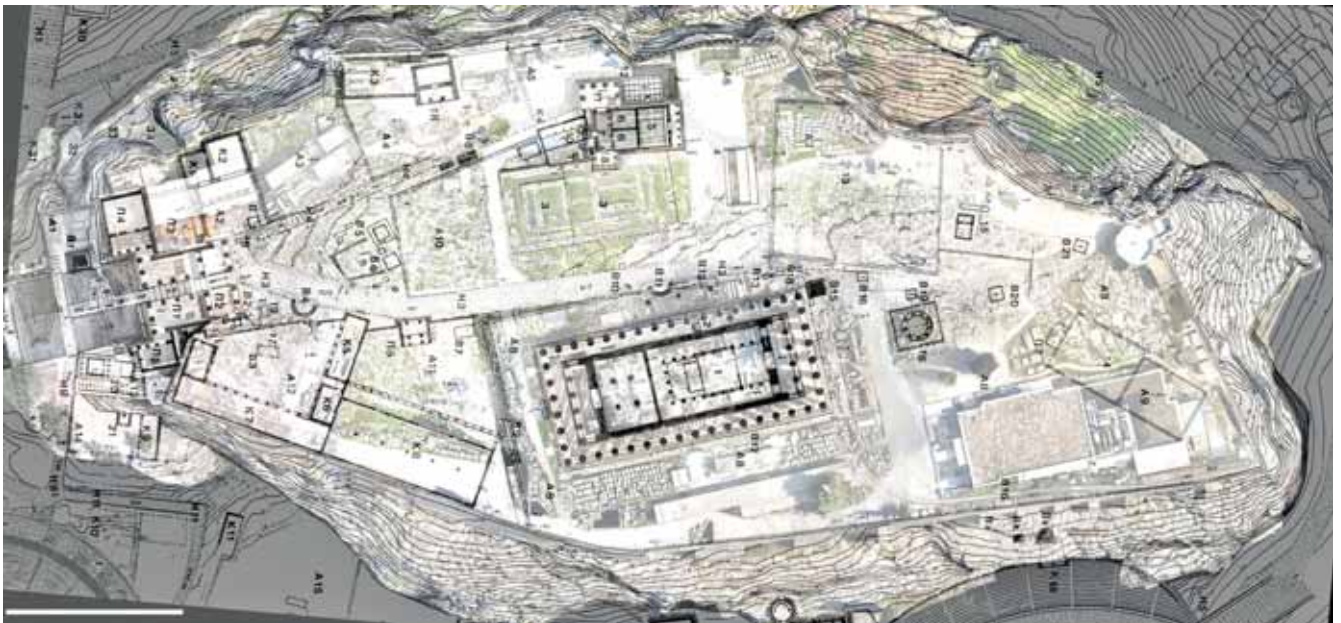


Fig. 20: A conjectural representation of the Acropolis plan in the 2nd century AD by Manolis Korres superposed on the digital photomosaic plan of the Acropolis depicted in Fig. 17. It shows the final arrangement of the Acropolis plateau and the west access of the Acropolis at the west end (far left in the image) after the completion of the whole project. It is obvious that if this happens, practically all of the Acropolis plateau and the west access will be covered with new structures. Source: Greek Ministry of Culture and Sports

# Threats to the Churches of the Virgin and St. George of the Gelati Monastery and their Wall Paintings

Manana Tevzadze, ICOMOS Georgia



Gelati Monastery is situated near the city of Kutaisi located in West Georgia. It had been listed on the World Heritage List since 1994 together with the Bagrati Cathedral until the major boundary modification in 2017, which excluded the Bagrati Cathedral from the WH property boundaries. An initial conservation plan for Gelati Monastery was prepared in 2008, while in 2017, a more comprehensive document – the *Gelati Monastery Conservation and Management Plan* – was elaborated. The plan was based on a number of studies analyzing its state of conservation, and set priorities for action.



Fig. 1: The Church of the Virgin of Gelati Monastery.

Photo: ICOMOS Georgia

For over a decade, the churches of the Gelati monastery have been having moisture problems, also noted in a number of UNESCO expert reports. In response, conservation works on the stone and wall paintings took place on the churches of the Gelati monastery intermittently between 2003–2016. Due to the continuous deterioration of the facing stone and the wall paintings caused by a complex of water infiltration reasons, it was decided to launch a major roof replacement project. Rehabilitation of the roofing started in 2013 and was completed in 2019. The works were co-funded by the Georgian Government, the US Ambassador's Fund for Cultural Preservation, and the World Bank.

While the UNESCO WHC and ICOMOS International have positively evaluated the *Gelati Monastery Conservation and Management Plan*, no technical evaluation has been obtained from them by the State Party regarding the roof rehabilitation project. As noted in the background, UNESCO reports have contin-

uously referred to endangered wall paintings in both churches since 2010. The only technical evaluation from ICOMOS International that exists for the site is for the structural reinforcement of the dome drum of the main church.

## Chronology of Recent Events

- In February 2020, the National Agency for Cultural Heritage Preservation of Georgia (NACHP) learned that due to frost, damages incurred on the newly rehabilitated roof of the Church of the Virgin which led to water infiltration in the West arm and was damaging the wall painting. An initial damage assessment report by the expert team of the NACHP dated March 2020 informed wider professional circles of the situation.
- In early summer, the roof of the damaged western arm was covered with blue all-purpose tarp, and NACHP started elaborating a project for temporary roofing.
- In August the NACHP opened a wider professional discussion in the form of council meetings where all concerned parties were invited. ICOMOS Georgia participated in these meetings, too.
- The State Party informed the UNESCO World Heritage Centre about the happenings and submitted a report containing information on the state of conservation of the Church of the Virgin;
- While the topic has been in the news since the spring<sup>1</sup>, in October a facebook page "Save Gelati Monastery" was launched by individual wall painting restorers. The page serves to collect relevant material and inform the wider public about developments.<sup>2</sup>
- Also in October, ICOMOS Georgia's expert board published its comments on the state of conservation of the site following a field visit.

1 <https://bit.ly/3nQvw2c> (Radio Liberty article, accessed 16.01.2020) <http://ifactereti.ge/gelati-new>; <http://ifactereti.ge/gelati2/>

2 [https://www.facebook.com/groups/438106840500226/?multi\\_permalink=514907892820120&notif\\_id=1610980036880334&notif\\_t=group\\_activity&ref=notif](https://www.facebook.com/groups/438106840500226/?multi_permalink=514907892820120&notif_id=1610980036880334&notif_t=group_activity&ref=notif)





Fig. 2: Damages of the facing stone on the Church of the Virgin. Photo: ICOMOS Georgia



Fig. 3: Damages of the facing stone of the Church of the Virgin. Photo: ICOMOS Georgia

- Temporary segmented roofing was installed under the dome, covering parts of the roofs of the cross arms in September.<sup>3</sup>
- Temporary segmented roofing was completed in November.
- Wall painting assessment and monitoring is ongoing.

### Scope of Damage and Future Threats

Damage resulting from water infiltration in both churches of the Monastery Complex – the Church of the Virgin and the Church of Saint George, are most evident on the facing stones and the wall painting. While a large portion of the roof tiles made from white clay have been broken and cracked, specific areas and reasons of water infiltration in the interior still remain the subject of further study. The other half of the tiles which were made of red clay have not cracked, but water infiltration is still evident under them, too.

Water infiltration damaged the wall painting in the interior. According to the on-site assessment and monitoring report conducted by specialists from NACHP, the following condition was observed:

*“The salt efflorescence has been detected as a main cause of deterioration, which is related to the water infiltration through damaged roofs and environmental conditions of the interior. Salt crystallization cycles have caused cohesion and adhesion*



Fig. 4: Open joints between the wall surfaces and the dome. Photo: ICOMOS Georgia



Fig. 5: Open joints between the wall surfaces and the roof construction.

Photo: ICOMOS Georgia

*failures of paint and plaster layers, loss of repair materials applied during previous interventions in the XX century as well as small wall painting fragment pieces from the original technology. Bioactivity has also been observed.*<sup>4</sup>”

The problem is further intensified by the fact that the response from responsible authorities – the Ministry of Science, Education, Culture and Sport and the NACHP – has been extremely slow. Time, which was precious in the wake of the cold season, was wasted by the NACHP, and the temporary roofing was completed only at the end of November.

The general impression of the professional civil society observing the situation is that the State Party does not acknowledge the degree of complexity of the problem. This is evident by the fact that the executing organization has been asked to commission a new batch of replacement ceramic tiles.

Presently, there is no complete interior scaffolding in either of the affected churches. Only the Church of the Virgin has in-

3 <https://agenda.ge/en/news/2020/3772> (accessed on 15.01.2020)

4 Information on the State of Conservation of the Church of Virgin of Gelati Monastery WH Property, Georgia submitted by the State Party to UNESCO

terior scaffolding on the south wall of the west arm. This is preventing the wall painting conservators from assessing the damage in the entire interior of both churches and undertaking long-term condition monitoring as well as preventive conservation measures such as removal of salts and local consolidation of the wall paintings.

The discussion on installing a temporary roofing on the church of St. George is only beginning now. Despite continuous requests by civil society, and recommended also by ICOMOS International in its December 2020 Technical Review in response to the Hazards Mitigation Short Term Action Plan submitted by NACHP to the WHC, installation of a complete temporary roofing is not under consideration by the State Party.

## The Root Causes

If examined carefully, the root causes for such dramatic results for a heritage site like Gelati, lie in the inadequate management system for cultural heritage preservation of Georgia, and precisely the management of World Heritage Properties. This issue has been discussed for decades now, and while there were some improvements, the system still remains ineffective. This reality is manifested in the state of conservation and management challenges of all three World Heritage Properties in Georgia, also featured in the World Heritage Watch Reports of 2017 and 2018.<sup>5</sup>

## Conclusion

Due to the complex nature of the problems, the study and analysis of the situation requires ample time before any decision can be made on further treatment. Meanwhile, the structure needs to be covered with a complete temporary shelter to prevent it from further damage and to enable specialists' access. At the same time, an interior scaffolding needs to be installed urgently, to allow proper monitoring of the state of conservation of the wall painting as well as implementation of preventive conservation measures on the effected murals. To conclude, it is of utmost importance that an international multidisciplinary team is convened, tasked to study the complexity of reasons and make recommendations on remedial action.

<sup>5</sup> world-heritage-watch.de/wp-content/uploads/2018/06/2018-Report-WHW.pdf, <https://villa.org.pl/villa/wp-content/uploads/2017/06/WHW-Report-2017.pdf> (accessed 18.01.2021)



# The Current State of Archaeological World Heritage Sites in the Idlib Governorate, Syria

Ammar Kannawi, Idlib Antiquities Center<sup>1</sup>

## The Jabal Al-Zawiya Region

Jabal al-Zawiya forms the southern part of the lime massif extending through northwestern Syria, and within this wide sector in Idlib governorate there are two archaeological parks: Park No. 4 which includes the sites of Al-Bara, Wadi Marathon (Wadi Martaoun), Majalia (Mujleya), Petrasi (Btirsas), Bashila (Bshilla), Shinsharah (or Khirbet Hass), Rabi'a Baouda, Dallouza (Dallouzé) and Serjilla, and Park No. 5 which extends on the

eastern slope of Jabal Al-Zawiya and includes the villages of Re-wiha (Rouweiha) and Jarada (Jeradé).

## The Jabal al-Ala (Upper Mountain) Region

In Jabal al-Ala, the highest mountain of the lime massif, there is Archaeological Park No. 6 which includes the villages of Qalb Lawza (Qalb Lozé), Kefir (Kfeir) and Karkabiza (Qirqbizé).

<sup>1</sup> This report as well as the survey were undertaken by the Idlib Antiquities Center under the scientific supervision of Prof. Dr. Abdalrazzaq Moaz and funded by The Gerda Henkel Foundation, Germany

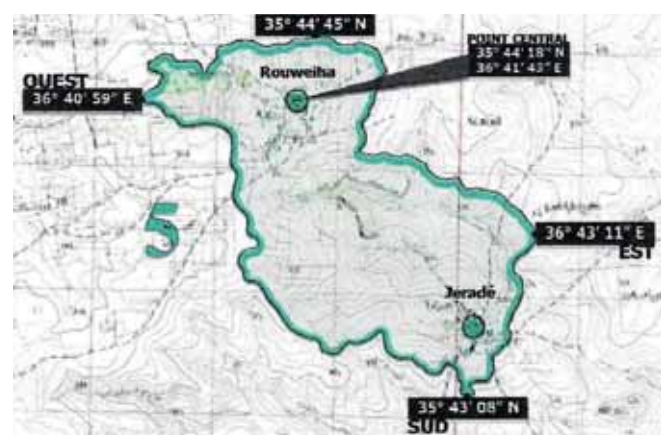
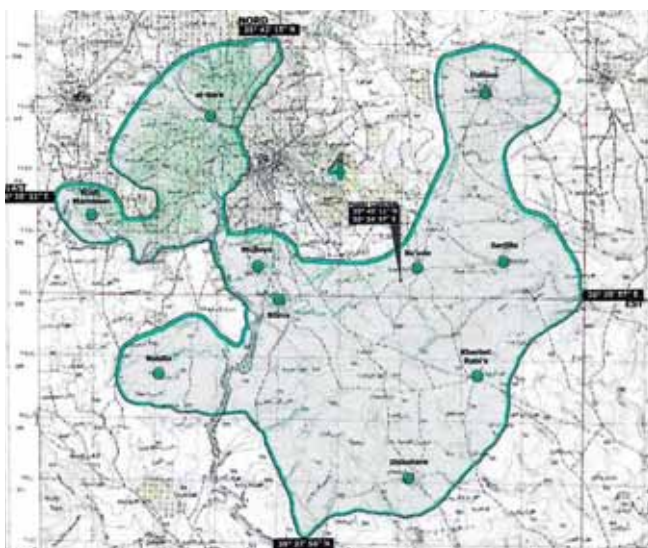
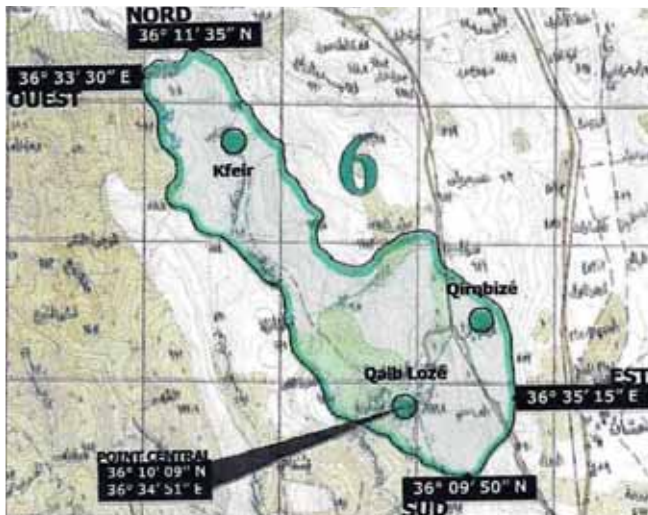


Fig. 1-4: The area of the Ancient Villages of Northern Syria (upper right). Archaeological Park 4 (lower left) and Archaeological Park 5 (lower right) can be found at the bottom of this map between Dschebel Zawiya and Maarat an-Numan. Archaeological Park 6 (upper left) can be found straight north, at the northern end of Dschebel al-Ala. Fig. 1: [www.amusingplanet.com/2016/08/the-dead-cities-of-syria.html](http://www.amusingplanet.com/2016/08/the-dead-cities-of-syria.html), Fig. 2-4: UNESCO



## Archaeological Park No. 4

The archaeological villages of Jabal al-Zawiya and the villages of the park in particular, have witnessed many emergency changes as a result of the ongoing war in Syria since 2011. They suffered from various types of damage according to the military variables on the ground. The following is a summary documentation of the current state of the park villages:

### 1. Al-Bara

During the war years, starting 2011 and until the date of writing this report, the ancient village was subjected to a wide range of damages, the most serious of which was the breaking of stone for reuse and sale for modern construction (Fig. 1). Bulldozing using heavy machinery led to the destruction of entire archaeological and architectural landmarks in addition to damages from vandalism, secret digging, urban encroachments (Fig. 2) and the use of some of the archaeological site's buildings as military barracks and shooting fields (Fig. 3A–B). At present, Al-Bara has become a site of clashes between the regime and opposition forces.



Fig. 1



Fig. 2

### 2. Serjila

The Serjila site is distinguished by its huge buildings that have preserved their status as they were before the Syrian war, and did not suffer major damage, as they were used at the beginning of the population displacement in 2014 and 2015 as places of residence (camps). After 2016 some of its buildings were used as military headquarters. This contributed to the lack of



Fig. 3A



Fig. 3B

digging and bulldozing in it, as happened in Al-Bara, but the site was bombed by Russian warplanes in 2020, which caused some damage to the western end of the site (Fig. 4 A–C).



Fig. 4A



Fig. 4B





Fig. 4C

### 3. Rabiah

Infringements can be identified by military presence, secret excavation and recent urban additions to the site (Fig. 5).



Fig. 5

### 4. The village of Petra

Infringements can be identified by urban sprawl and secret digging (Fig. 6 A-B).



Fig. 6A



Fig. 6B

### 5. Shansharrah village

During the war, the site turned into a camp for the opposition factions. The site was subjected to several air strikes, in addition to barrel bombs and shells. We observed the presence of pits and trenches that are used to protect against bombing, in addition to the use of earth buildings carved out of rock (Fig. 7).



Fig. 7

### 6. Bashila village

The site has been exposed to many violations, including secret drilling and stone cutting (Fig. 8 A-B).



Fig. 8A



Fig. 8B



### 7. A return village

The site was subjected to acts of vandalism with the aim of excavating the antiquities, as many random pits appeared on the surface of the site and others near the foundations of some buildings (Fig. 9 A–B).



Fig. 9A



Fig. 9B

### 8. Majella village

Infringements can be identified from secret digging, stone crushing, and urban encroachment (Fig. 10 A–B).



Fig. 10A



Fig. 10B

### 9. Dallouza village

The site was not exposed to serious violations during the conflict in Syria due to its isolation and its distance from modern housing.

### 10. Wadi Marathon

The nature of the Wadi Marathon site, which includes caves carved into the rock, prompted some military groups to use the site as a military headquarters. There was no documentation process for it during the previous period.

## Archaeological Park No. 5

Park No. 5 extends in Idlib governorate and includes two villages, Rewiha and Jerada.

### 1. Rewiha village

Infringements can be identified from breaking down ancient stones, modern housing, using some of the site's buildings as temporary housing or livestock shelters, or military presence.

With the advent of the year 2020, this area has become threatened. This site has become on the line of fire and armed clashes, and the Syrian regime forces were able to control the site and turn it into a military barracks (Fig. 11 A–D).



Fig. 11A



Fig. 11B





Fig. 11C

## 2. Jerada village

The archaeological identity of this site has been preserved by the local population, but this did not prevent the presence of some encroachments such as cutting ancient stones, occupation with modern buildings, and secret illegal digging (Fig. 12 A–B).



Fig. 12A

## Archaeological Park No. 6

The Jabal al-Ala is one of the main mountains that form the limestone block in northwestern Syria and includes many Roman and Byzantine archaeological villages. Three sites were chosen to form Archaeological Park No. 6 in addition to other gatherings in the rest of the Limestone Massif: Qalb Lozeh, Kefir and Karkabiza, with an area estimated at 160 km<sup>2</sup>.

The **Qalb Lozeh Church** is considered the most important landmark in this park (Fig. 13A). Despite its historical and architectural importance, it has been subject to neglect and abuse over the past period due to the neglect of the site by the local community as a result of their sensitivity to the conflict, as they are from the Druze religious minority, in addition to the displacement of a large number of residents of the village and the entry of large numbers of displaced persons and immigrants.



Fig. 11D



Fig. 12B

Qalb Lozeh Church did not suffer major damage during the conflict period in Syria, as in some other locations. What helped was the fact that the church was located in the middle of the modern village and relatively far from the areas of war and conflict. However, its location in the midst of a modern residential complex exposed it to unfair exploitation for a period of time, and some collateral damage was reported of the building. Damages can be identified as follows:



Fig. 13A





Fig. 13B



Fig. 13C



Fig. 13D



Fig. 13E

- The use of the church as a barn for animals. The church was transformed between 2014 and 2017 into an animal pen for raising cows and sheep by one of the displaced arrivals from Aleppo governorate. Fig. 13 B–C indicates that these encroachments remained superficial and did not harm the structural and architectural elements of the Church. With the efforts of the Idlib Antiquities Center, and in cooperation with the local council in the village, we were able to re-liberate the church and prevent it from being used as a hangar (Fig. 13 D–E).
- In addition, traces of some digging and bulldozing were detected in 2017 below the southern facade of the church, and these pits reached the bottom of the foundations (Fig. 13 F) in addition to the presence of a group of small pits in the nave, the largest of which is near the apse on the side of the northern gallery (Fig. 13 G).
- As for vandalism, the church did not witness deliberate acts of vandalism, especially for its rich decoration, and it preserved well the decorative elements, but we noticed the presence of vandalism on the upper row of the two-row staircase leading to the apse, where the stone tiles were removed and remained in the vicinity of the apse. The stone tiles were returned to their sites in order to save them from being lost without being linked to the mortar pending a stable restoration in the future (Fig. 13 H–I).

In March of 2020, and as a result of the military developments in southern and eastern Idlib, a group of displaced people from the western countryside of Aleppo entered the church and took the archaeological building as a center for the establishment of a temporary school, where they installed metal panels to



Fig. 13F



Fig. 13G





Fig. 13H



Fig. 13J



Fig. 13I



Fig. 13K

close the windows and openings, starting from the openings in the wall of the apse and the western door of the church (Fig. 13 J–K).

Ducts with plastic pipes were also dug to create a drainage network. It starts from the apse and extends outside the church below the southern façade to reach a deep excavated pit opposite the facade of the church from the west as a cistern to collect sewage water. Many water tanks were placed inside and around the church (Fig. 13 L).

In addition to fixing metal elements on the ancient walls by applying pressure without drilling holes in the ancient walls (Fig. 13 M). This attack caused a major rejection by the townspeople, and in cooperation with the Idlib Antiquities Center, the dangerous infringement was stopped through a large popular campaign with the help of the people, and the situation was restored to what it was previously (Fig. 13 E, N–O).

As for the second site in the park, Qaraqebiza, which is located northeast of Qalb Loze, about 1 km away, which has turned



Fig. 13L



Fig. 13M



during the conflict period into the headquarters of an opposition faction until 2016, when the site was vacated from the military presence.



Fig. 13N

Despite this encroachment, the site still preserves its authenticity to an acceptable extent, and the effects of encroachments on it can be mitigated with time, as most of them are superficial and can be removed in the future, except for the exposure of many archaeological façades to light and medium gunshots that destroyed parts of them and distorted the decorative elements and fragmented surface of archaeological stones (Fig. 13 P–S).



Fig. 13P



Fig. 13Q



Fig. 13O



Fig. 13R



Fig. 13S

Perhaps the southern façade of the church (the most important building on the site) was the most affected building by this encroachment, as the outer façade of the wall surrounding the church was deformed, in addition to the upper half of the southern wall of the church façade, where the decoration of the lintel above the western door was lost while the lintel itself was damaged. The eastern door has the same façade to a lesser extent. As for the secret drilling, there are pits of shallow depth and a number that are spread on the site and have not caused much damage (Fig. 13 T-V).





Fig. 13T



Fig. 13U



Fig. 13V

However, in the spring of 2020, the site was used as a camp to accommodate people displaced from other parts of Syria. Dozens of makeshift tents were established within the site (Fig. 13 W–X), and housing continued for a period of three months until the Idlib Antiquities Center was able to evacuate the site. No real damages were recorded on the site as a result of the establishment of the temporary camp (Fig. 13 Y).



Fig. 13W



Fig. 13X



Fig. 13Y

The site of Al-Kefir is located in an isolated and uninhabited area northwest of Qalb Lozeh. It preserved its general shape throughout the years of the conflict in Syria and remained spared from modern housing and relatively far from the camps of the displaced, which preserved the site's buildings and its environmental surroundings. Nevertheless, we observed some encroachments, such as secret digging, as many illegal pits were spotted at the site which are spread over many buildings. They are relatively shallow pits that damaged the surface layers and some foundations (Fig. 14 A-B).





Fig. 14A



Fig. 14C



Fig. 14E



Fig. 14B

The most important of these pits were in the square of the church on the south side and below the apse of the church on the northern outside, where it revealed the foundations of the apse and the bases of the pillars. In addition to the church, pits are spread more widely in the western neighborhood of the site, and these pits revealed some of the walls, foundations and contemporary reservoirs (Fig. 14 C-D).

In Kefir, we notice the use of many of the site's buildings as pens for raising goats and sheep by the residents of the neighboring village of Qalb Loza (Fig. 14 E-F). But this use was not an unfair use and did not cause real damage to the site. Walls of rubble were added to the surface of the site with clay mortar



Fig. 14D



Fig. 14F

to fill the openings and some crumbling walls. There were no recent additions that harm the public view.

## Conclusion

Through the current report, we note the extent of the damage suffered by the archaeological villages registered on the World Heritage List, but we confirm that most of these damages did not cause serious concern that these villages were left out of the cultural and archaeological landscape that is distinctive to them and which contributed to their inscription in the List. We hope that the recent changes will not affect the current state of these ancient villages and make the situation worse. We also hope that the local people will return to their villages near the archaeological sites, so that the area will be a perfect example of the patterns of coexistence between man and his historical and environmental surroundings.

## Recommendations

In order to preserve the World Heritage sites mentioned in this report on the current situation and to stop the damage at this point, we hope that UNESCO will work on preparing a letter of recommendation regarding the preservation of these sites and disseminating its content to all the active forces on the ground in Syria, not just the Syrian government, but including all of Russia and the Turkish Republic and remind them of the necessity to exclude these WH ancient villages from the bombing and battles, especially in Jabal Al-Zawiya within the Archaeo-

logical Parks No. 4 and 5, in particular when we know that the archaeological villages and their surroundings in these parks are almost empty of people at the present time.

As for the archaeological villages located in Archaeological Park No. 6, we hope to create a support program for the local councils, especially the local council in the village of Qalb Loza, which belongs to the villages of the archaeological park, to preserve the three sites and spread awareness among the local population of the importance of preserving antiquities in the area, especially after the positive role which they played to rescue Qalb Loze Church.

We also hope to provide technical support and training for archaeological teams working within the framework of the local community, headed by the Idlib Antiquities Center, to play the role of observer of the archaeological parks over the entire limestone block area, to prepare regular reports on the status of the archaeological parks, and to work to preserve them, spread awareness among the local community and involve it in the conservation process.

Finally, we ask UNESCO to instruct international humanitarian organizations operating in northwest Syria not to build camps and equip service facilities for these camps within the archaeological areas. (This happened recently in several archaeological sites in Mount Barisha, which are located outside the villages of the Archaeological Park.)



# Chinese-style Pavilions in Front of Jokhang Temple Shows China Disregards Tibetan Heritage

International Campaign for Tibet



Fig. 1: The square in front of the Jokhang temple in summer 2014.

Source: Tsering Woesser, 7 May 2020<sup>1</sup>



Fig. 2: Construction of two pavilions in Chinese style over the three steles in front of the Jokhang temple.

Source: Tsering Woesser, 7 May 2020<sup>2</sup>

The Historic Ensemble of the Potala Palace, Lhasa, consists of three components: the Potala Palace (inscribed in 1994), the Jokhang temple (inscribed in 2000), and the Norbulingka area (the Dalai Lama's former Summer Palace, inscribed in 2001).

On 28 April 2020, at the end of a three-month ban on accessing the Barkhor area due to the SARS-CoV-2 outbreak, local Tibetans returned to circumambulate the 1,300 year-old Jokhang temple, one of Tibet's holiest temples. Upon their return, many noticed the construction of two new Chinese-style pavilions in front of the Jokhang temple. The Tibetan blogger, Tsering Woesser (based in Beijing), first collated images and reported on the new constructions in May 2020.<sup>2</sup> Subsequent photographs captured in August 2020 and posted by Woesser indicate the construction has been completed.

In an article, Woesser noted the two large Chinese-style pavilions did not accord with Tibetan traditional

1 Facebook post by Tsering Woesser, 7 May 2020, <https://www.facebook.com/woesser1959/photos/pcb.160721862155101/160721625488458/>.

2 Radio Free Asia, 5 May 2020, '评论 | 唯色：疫情期间赫然出现在大昭寺前的两座中式碑亭（上）' (Pinglun | wei se: Yiqing qijian heran chuxian zai dazhao siqian de liang zuo zhongshi bei ting [shang]; Comment | Woesser: Two Chinese-style stele pavilions that appeared in front of the Jokhang Temple during the epidemic [part 1]), <https://www.rfa.org/mandarin/pinglun/weise/ws-05052020104015.html>.



building styles, obstructed the facade of the Jokhang entrance, and were located in the same position where three historically significant stone steles (stone columns with commemorative inscriptions) stand<sup>3</sup>:

1. The Tang China and Tibet Treaty Stele: Inscribed in Tibetan and classical Chinese, the stele was erected in 823 AD to mark a border agreement between the Chinese and Tibetan empires.
2. The Smallpox Stele: erected in 1794 by the Manchuminister stationed in Tibet.
3. Third Stele: believed to be erected by Tsongkhapa in 1409 following repairs to the Jokhang Temple.



Fig. 3: September 2020: Construction of the two Chinese-style pavilions has been completed.  
Source: Tsering Woesser, 3 September 2020<sup>5</sup>

While it may be argued that the pavilions were designed to protect the historic steles from damage, it is evident that the size and Chinese-style of the pavilions were not designed to maintain architectural consistency with the Jokhang temple.

In correspondence with the World Heritage Centre, International Campaign for Tibet (ICT) raised concerns about the new construction and requested more details about the construction site, as well as its effects on the Outstanding Universal Value of the Jokhang Temple. As of 13 April 2021, no substantial reply has been received.

This recent construction activity is not an isolated case. China has repeatedly pursued unapproved or inconsistent developments across the heritage site. In 2014, it was discovered that China had begun construction of two large shopping malls (the Barkhor and Shenli Mall) before seeking comment from the World Heritage Centre, in non-compliance with § 172 of the Operational Guidelines.<sup>6</sup> Not only was China's report not forthcoming about the details of the construction, but it was later discovered that the height of the malls were also in contravention of the State Party's regulations.

China's more recent response to the February 2018 fire that engulfed a part of the Jokhang Temple highlighted the serious lack of transparency in heritage management. It was not until ICT pressed the UNESCO World Heritage Centre on the absence of China's 2019 'state of conservation' report, that a two-page executive summary was released on 28 January 2020 (one month after the required date). The two-page summary described minimal fire damage to the temple and noted a Joint Reactive Monitoring mission was received at the property on 8-15 April 2019.<sup>7</sup> While ICT welcomed the news of the Monitoring mission, we were disappointed that no details of the visit were publicized. For example, details of the restoration and conservation plan were not released, nor photographs or maps.

It is important to note, at a more fundamental level, China has repeatedly failed to show that the heritage site is under competent and responsible management. Since 2003, China has failed to provide clear definitions of the property's buffer zone boundaries. Requests for conservation plans have also been outstanding since 2007.

## Recommendations

Given the lack of transparent reporting, the failure to provide a conservation plan and map of the inscribed area (with protected and buffer zones), and recent evidence of new constructions in the heritage site, the Committee should invoke more serious measures, such as consider inscribing the site as a World Heritage in Danger. As per § 179 of the Operational Guidelines,<sup>8</sup> the lack of conservation policy, threatening effects of regional planning projects, and the significant loss of historical authenticity are at least three criteria that the property satisfies for inscription on the List of World Heritage in Danger.

3 English translation of Tsering Woesser's article, High Peaks Pure Earth, 3 June 2020, "Shocking: During the Epidemic, Two Chinese-Style Pavilions Appear in Front of the Jokhang Temple (Part 1)" By Woesser', <https://highpeakspureearth.com/shocking-during-the-epidemic-two-chinese-style-pavilions-appear-in-front-of-the-jokhang-temple-part-1-by-woesser/>.

4 Facebook post by Tsering Woesser, 7 May 2020, <https://www.facebook.com/woesser1959/photos/pcb.160721862155101/160721625488458/>.

5 Facebook post by Tsering Woesser, 3 September 2020, <https://www.facebook.com/woesser1959/posts/198059791754641>.

6 UNESCO, 2014, 'Historical Ensemble of the Potala Palace, Lhasa', <https://whc.unesco.org/en/soc/2811>.

7 UNESCO, 2019, 'Summary of the State of Conservation by the State Party: Executive Summary, Historic Ensemble of the Potala Palace, Lhasa', <https://whc.unesco.org/document/180372>, page 1.

8 World Heritage Centre, July 2012, 'Operational Guidelines for the Implementation of the World Heritage Convention', United Nations Educational, Scientific and Cultural Organisation, <https://whc.unesco.org/archive/op-guide12-en.pdf>, paragraph 177-179.

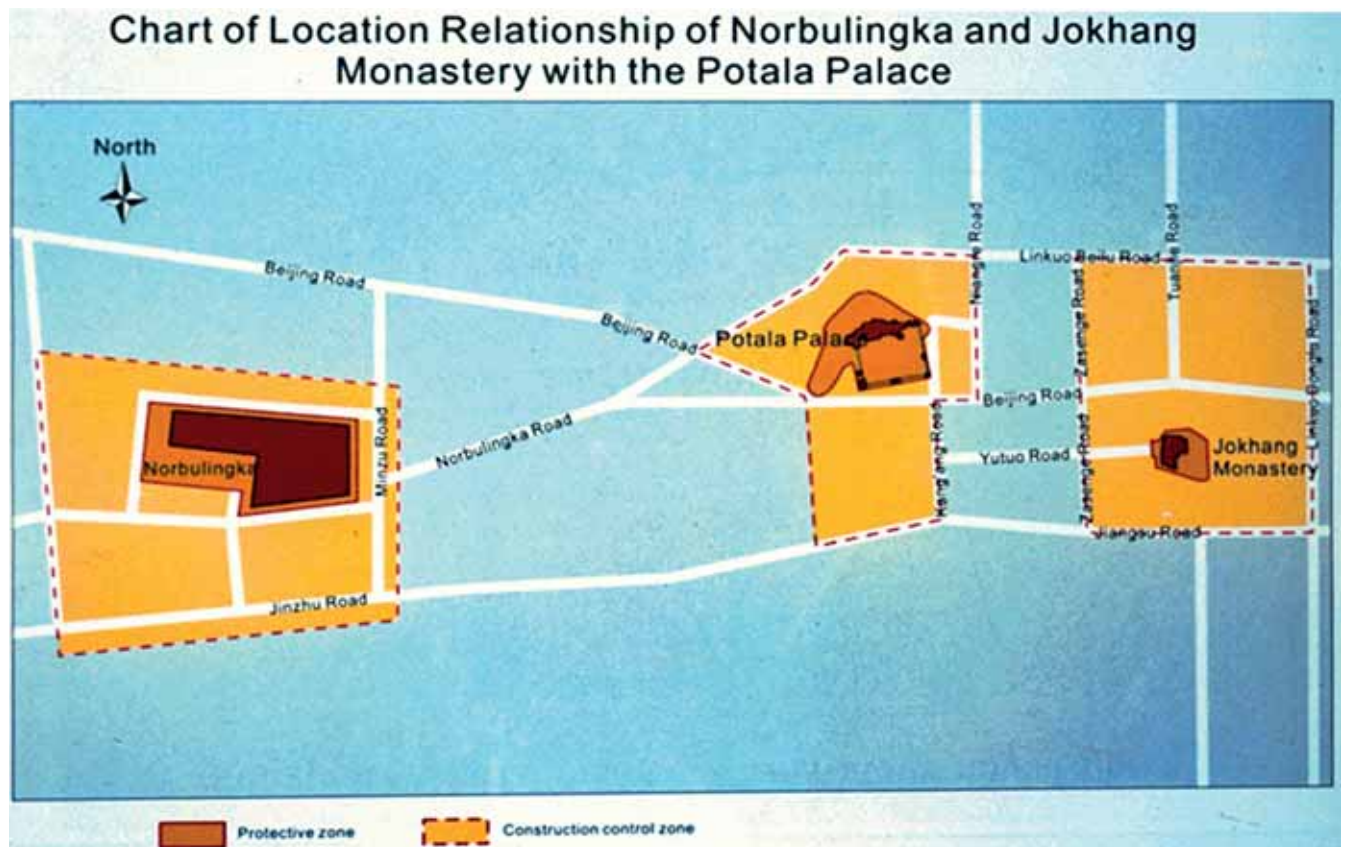


Fig. 4: The map of the inscribed World Heritage sites and their buffer zones in 2000 offer only a rough indication of their boundaries.

Map: UNESCO

To allay the genuine concerns of Tibetans and those interested in the preservation of the historical and cultural authenticity of the heritage site, we welcome efforts to promote greater transparency, with particular regard to details (including photos and maps) of the 2019 fire damage, and a restoration and conservation plan for the property.

Given historical issues related to unapproved development plans, the exclusion of traditional Tibetan designs and materials, as well as the exclusion of Tibetan residents, artisans, pilgrims and religious community from the management of

the property, we recommend the Committee request all future 'State of Conservation Reports' include a detailed description of the strategies pursued to include Tibetans, their knowledge and needs into the development and conservation of the property. Reporting should include details of the number of Tibetan residents, artisans, or pilgrims consulted, and the ways in which their recommendations have been adopted. This regular reporting requirement will demonstrate a genuine commitment to preserving and revitalizing rather than museumizing private and public Tibetan spaces that make up the property.

## II. Historic Cities

# All Seems Lost on Liverpool Maritime Mercantile City WHS

Gerry Proctor, Engage Liverpool



The expected World Heritage Committee meeting<sup>1</sup> in 2020 suffered the same delays as most other programmed events and meetings since the Covid-pandemic erupted in the world. This meant that in Liverpool we continued to hope that our city will not be deleted from the list of UNESCO World Heritage Sites. To a civil society organisation such as Engage it is obvious that the global pandemic has dramatically affected one of the most important areas of our economy – tourism and the visitor economy. It has virtually ceased, and it looks very much like nothing will be restored for many months and possibly even years. And add to that the unknown impact of Brexit upon tourists from Europe and the city is facing a serious and potentially devastating crisis.

Losing such a prestigious status as a UNESCO WHS at this time would be a disaster – a real loss for the city but also a loss for humanity were that to happen. Our status sets us apart from almost every other city in the UK and places us alongside some of the most significant and most visited sites in the whole world. And the world gains an insight into a unique moment in global history at the height of the British Empire, in the design and build of an exceptional dock system that was a world-first which led to extraordinary prosperity for the citizens of Liverpool. The problem now is that our Outstanding Universal Value is under threat from development proposals, specifically the Everton FC stadium plans within the Bramley Moore Dock in Liverpool's waterfront World Heritage Site as well as our lack of a tall buildings policy.

At the time of writing this piece the planning application for the stadium had yet to be presented to the Liverpool City Council Planning Committee and so to some extent we were all awaiting the decision of the Planning Department on whether they would recommend the application for approval. However, no one expected anything other than a positive recommendation to be presented to the elected representatives, and so it proved. And no one expected councillors to do anything other than approve it which they did unanimously.

The nature of politics in the city has for some time been determined by the impact on the city council of the elected Mayor

Joe Anderson, whose influence was widely felt across the city on many levels. However, in December 2020 he was arrested<sup>2</sup> by the police for questioning in connection with offences concerning bribery and witness intimidation as part of an ongoing investigation into building and development contracts.

His arrest followed a year of extraordinary turmoil<sup>3</sup> within the City Council particularly in the Regeneration Department which includes Planning. In December 2019 the Mayor's appointed Director of Regeneration Nick Kavanagh was arrested<sup>4</sup> by police and questioned over conspiracy to defraud and misconduct in a public office along with a developer from the city. He was re-arrested<sup>5</sup> in September on suspicion of conspiracy to commit bribery along with a number of other individuals. It was hard to know what if any impact this would have on the World Heritage Site and specifically on the Bramley Moore Dock proposals. By the end of the year the UK Government<sup>6</sup> had decided to send in inspectors to review the city and its governance arrangements<sup>7</sup> and they issued a damning verdict and a devastating report<sup>8</sup>.

During this year with the Covid health crisis and significant local political turmoil the City Council found time to publish the long-awaited North Shore Vision, that had been taken to Paris for a preview with UNESCO officials at the start of 2020, and whose virtual launch in September was attended on-line by Isabelle Anatole-Gabriel (Chief of the Europe and North America Unit at the World Heritage Centre in Paris) and other heritage

<sup>1</sup> <https://whc.unesco.org/en/sessions/44COM>

<sup>2</sup> BBC News 04.12.20 <https://www.bbc.co.uk/news/uk-england-merseyside-55192375>

<sup>3</sup> Liverpool Echo: 12.12.20 <https://www.liverpoolecho.co.uk/news/liverpool-news/seven-days-rocked-liverpool-core-19432035>

<sup>4</sup> Liverpool Echo: 19.12.19 <https://www.liverpoolecho.co.uk/news/liverpool-news/city-property-developer-council-regeneration-17445045>; 10.01.20 <https://www.liverpoolecho.co.uk/news/liverpool-news/arrested-council-chief-not-work-17540517>

<sup>5</sup> Place North West 03.09.20 <https://www.placenorthwest.co.uk/news/kavanagh-among-five-arrested-by-merseyside-police/>

<sup>6</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/945913/Letter\\_to\\_Tony\\_Reeves\\_171220.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945913/Letter_to_Tony_Reeves_171220.pdf)

<sup>7</sup> Liverpool Echo: 17.12.20 <https://www.liverpoolecho.co.uk/news/liverpool-news/government-investigation-launched-liverpool-council-19478159>

<sup>8</sup> <https://www.engageliverpool.com/news/devastating-report-into-city-council/>



officials from ICOMOS and Historic England. As we described in our report last year there is much to be admired in this Vision and it is a welcome addition to the city's attempt to belatedly recognise the value of its UNESCO designation. It received very positive reports in the local and national media<sup>9</sup>.

The crux of the argument now with UNESCO is really about the original decision to start a process that has deliberately led us to a place where the city, Everton FC and the landowner Peel are in the strongest position having invested millions in the project and brought most of the city on board with their public consultation processes. It needs to be said that during these consultations it was never explained that building inside the largest dock structure in the WHS – the Stanley Dock group of docks – was not possible within the mutually approved guidelines and agreement signed by the government and UNESCO. So, it is not about whether we like the design of the proposed stadium or not, nor the concept of it being on the waterfront, but it is the very idea of it being compatible with the nature of the WHS and the decision everyone made to protect its OUV (Outstanding Universal Value).

And the answer was known to all those who started this process, which does include Mayor Anderson (who is a strong supporter of the team), the landowner as well as the football club. There are no innocents here, and during the years when this process was allowed to run unchecked the prevailing narrative coming from the Town Hall was that progress and development trumped everything, and that UNESCO must not be allowed to stand in the way of this project. It is only at the last minute that some began to realise that there was after all some value in the designation that we are threatened with losing. And the North Shore Vision is part of that new effort to try and bring UNESCO and other heritage bodies to allow this development because everything else we will do in the future will be compatible with our being a World Heritage Site.

It is also a sad reality to note that most people think that if the proposed stadium doesn't go ahead the dock will remain abandoned and desolate for ever – which of course isn't true. It will take some time for land values to rise and the setting itself to improve (it has a rather unsightly northern border with a working dock) before anyone might bring forward proposals acceptable to the landowner but also economically feasible for any potential developer. Yet it will be developed in due course. However, the city is now in a position where it has already prepared people for the loss of our status and the Mayor's supporters are in the press regularly making the case for the sta-

dium and against the 'heritage lobby'<sup>10</sup>, so should that happen the blue half of the city (Everton FC's colours are blue and Liverpool FC's red) will jubilantly welcome the stadium and most people will agree that development is what is needed right now. Few sadly will mourn the loss. The UNESCO narrative that values our being part of a global humanity by making a unique contribution to it no longer plays well in a society driven by nationalist populism and short-term development needs.

Engage is not the first or the only civil society actor to point out that had the city and landowner wanted to invite Everton to build a new stadium on the waterfront they actually had land available that would not have caused any problem at all with our WHS status. But they chose to offer the football club the water-filled largest dock in the complex which itself would have no monetary value for the landowner should it remain an open-water dock space. And the city's Mayor loved to point out the truth that historically Liverpool always infilled its redundant docks and built upon them (the famous Three Graces at the Pier Head being a case in point).

Having personally attended the World Heritage Committee meetings in Krakow (41<sup>st</sup> session 2017) and Bahrain (42<sup>nd</sup> session 2018) I have seen for myself the political nature of the Committee meetings and noticed how blocks will form to support certain countries no matter what they have done to damage the OUV of their World Heritage Sites. I suspect Liverpool will also be affected by this geo-political reality when our case is brought to a vote. I cannot help but think about what I also picked up at the sessions, that it seems that the west is often held to standards that other countries are not expected to meet. The decision on Liverpool might now be made at the postponed 44<sup>th</sup> session which will take place in July 2021 from Fuzhou, Fujian province, China.

Engage would understand a negative decision from the World Heritage Committee, but we had wanted to request the World Heritage Committee not to delete Liverpool from the World Heritage List at its 44<sup>th</sup> Session but rather postpone such a decision until after the decision-making process in the UK has been finalized. There seemed to be a strong possibility that if the Planning Department recommend approval to the Planning Committee of Liverpool City Council then the UK Government would be asked to call it in<sup>11</sup> for a full report from an inspector before making any decision. However, the UK Secretary of State Robert Jenrick decided against 'calling in' the decision and approved the plans so that the stadium can now go-ahead unopposed.<sup>12</sup>

<sup>10</sup> LBN Daily 09.09.20 <https://lbn.daily.co.uk/heritage-lobby-scupper-evertons-stadium/>

<sup>11</sup> Liverpool Echo: 28.02.20 <https://www.liverpoolecho.co.uk/news/liverpool-news/decision-day-edges-closer-evertons-17828508> (the Echo says that is unlikely but we are sure it will happen as the DSOCR states quite clearly that: "Where necessary the State Party will call in development proposals for determination at the national level rather than by LCC.")

<sup>12</sup> <https://www.bbc.co.uk/news/uk-england-merseyside-56541316>

<sup>9</sup> Insider Media 10.09.20 <https://www.insidermedia.com/news/north-west/heritage-led-plans-launched-for-liverpool-docklands-future>; Local Gov 11.09.20 <https://www.localgov.co.uk/Liverpool-launches-UKs-first-heritage-led-development-plan/51067>; Environment Analyst 14.09.20 <https://environment-analyst.com/uk/105938/liverpool-publish-plan-to-keep-un-world-heritage-status>



Fig. 1: View of the central west stand. Source: <https://www.business-live.co.uk/economic-development/top-everton-official-speaks-out-18918733>

Everton FC had submitted their final plans<sup>13</sup> to the City's planning department, and the revised drawings show some changes<sup>14</sup>, notably the removal of a car park from the eastern edge of the site facing the River Mersey (Fig. 1) and its replacement with a much better stepped piazza overlooking the river which will be both a fitting start and end of an extensive walkway along the full length of the river<sup>15</sup>; this has meant that fans will now have a covered entrance to the turn-styles along the river entrance to the ground (Fig. 2); and the height of the roof has been reduced<sup>16</sup> and the area around the ground has been decluttered with energy-efficient power sources being moved to the roof of the stadium (Fig. 3). And Mayor Anderson has

announced that he will withdraw<sup>17</sup> from the forthcoming postponed elections in May. Engage had hoped that both the Government of the UK and UNESCO ambassadors would consider those ordinary citizens of Liverpool who desperately wanted to hold onto our status and who have always valued the decision made to inscribe our city as a World Heritage Site in 2004. But once again politicians have their reasons for the decisions they take and so we are now expecting certain deletion from UNESCO's World Heritage List, becoming only the second European city to lose its status following Dresden Elbe Valley in 2009.<sup>18</sup>



Fig. 3: A drone view of the planned Everton Stadium from the south.

Source: <https://www.bbc.co.uk/news/uk-england-merseyside-53999295>



Fig. 2: A view from the southwest. Source: <https://royalbluemersey.sbnation.com/2020/8/26/21402765/everton-new-stadium-delay-latest-bramley-moore-designs-planning-application-unesco-world-heritage>

<sup>13</sup> Infrastructure Intelligence 15.09.20 <http://www.infrastructure-intelligence.com/article/sep-2020/everton-fc-amend-new-stadium-design>

<sup>14</sup> Liverpool Echo 26.11.20 <https://www.liverpoolecho.co.uk/sport/football/football-news/everton-new-stadium-designs-improved-19346486>

<sup>15</sup> Pitchcare.com 16.09.20 <https://www.pitchcare.com/news-media/everton-submit-new-plans.html>

<sup>16</sup> New Civil Engineer 13.09.20 <https://www.newcivilengineer.com/latest/everton-reduces-stadium-height-to-appease-historic-england-concerns-13-09-2020/>

<sup>17</sup> The Guardian 01.01.21 [https://www.theguardian.com/uk-news/2021/jan/01/liverpool-mayor-joe-anderson-withdraws-from-elections?CMP=Share\\_iOSApp\\_Other](https://www.theguardian.com/uk-news/2021/jan/01/liverpool-mayor-joe-anderson-withdraws-from-elections?CMP=Share_iOSApp_Other)

<sup>18</sup> <https://whc.unesco.org/en/news/522#:~:text=The%20World%20Heritage%20Committee%20decided,outstanding%20universal%20value%20as%20inscribed.%22>

# Okhta Cape: Archeological Site Extending from the Stone Age to the XVIII Century in Urgent Need of Support and Recognition

Elena Minchenok

The UNESCO WHS 540 “Historical Center of St. Petersburg and Related Groups of Monuments” was inscribed in 1990 as a serial property with 36 components, some further subdivided into elements. The site composition and boundaries were clarified and adopted in 2013. We can now claim that a new clarification is needed, since within one of the existing components, 540-029 The Neva River with Banks, a site of major cultural, historic and archeologic significance is situated that is not reflected otherwise in the nomination (Fig. 1). These are the four layers of authentic archeological material dating from the Late Stone age to the early XVIII century known as the Okhta Cape.

## Gazprom tower, a blessing in disguise

Excavations at Okhta Cape, a high-positioned bank where the river Okhta joins the Neva (Fig. 2), began in the 1990s to uncover the remains of the Swedish fortress Nyenskans. The territory was declared an archaeological monument, the St. Petersburg Committee for the Protection of Monuments of History

and Architecture (KGIOP) took it under protection. When the owner of the site, the Petrozavod shipbuilding enterprise, went bankrupt in 2000, the city authorities sold the territory (according to some sources, illegally and for way much less than a fair value) to Gazprom Neft, a subsidiary of Gazprom. The new owner of the cape demolished the factory buildings and, as required by law, invited archaeologists to conduct examinations before constructing a high-rise office center – the infamous 400-meter Gazprom tower.

The skyscraper project violated the height regulations in force, the area of the archeological site was diminished to permit construction. The response of the St. Petersburg civil society was full-throated, since the 400-meter tower of Gazprom would compromise the WHS and the visually related basins, and destroy the archeology. The demands of civic activists were joined by numerous professional and non-governmental organizations worldwide. In 2007, a session of the UNESCO World Heritage Committee urged the authorities of the Russian Federation to suspend the project, warning that the World Heritage site would be put on the List of World Heritage in Danger. In 2010, Russian President Dmitry Medvedev publicly doubted the need for a skyscraper on the Okhta Cape, and by the end of the year the city authorities and Gazprom decided to move the project to another location.

## Five thousand years from now

Until the discovery of Nyenskans, it was believed that by order of Peter I the fortress was completely destroyed, and archaeologists did not expect at all to find a whole “layered cake” of fortifications and settlements from different eras well preserved under the foundations of the buildings. Nothing like this has ever been found in Northwest Russia.

During the excavations, ditches, bastions, wooden ramparts and even a secret passage – stairs leading into the moat – were uncovered as well as the remains of a wooden res-

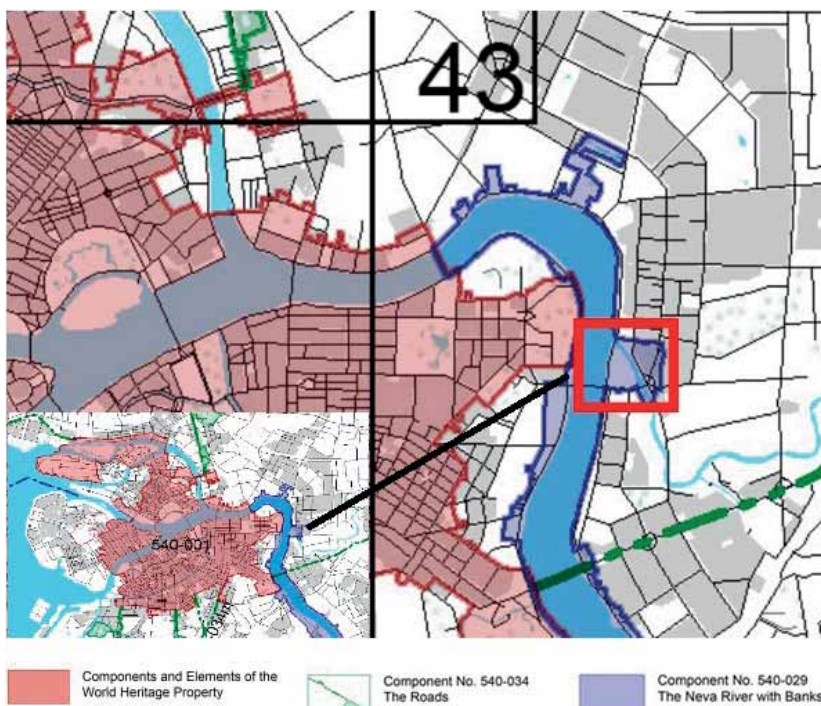


Fig. 1: The territory of the Okhta Cape marked with a red outline within the boundaries of the Component 540-029 “The Neva River with Banks” (fragment of the official maps of the inscribed property with clarifications of 2014 adopted). Source: [https://whc.unesco.org/en/list/540/multiple=1&unique\\_number=1958](https://whc.unesco.org/en/list/540/multiple=1&unique_number=1958)





Fig. 2: Bird's eye view of the Okhta Cape as of 2021.

Source: <https://okhta.online/aktualno/budushhee-ohinskogo-mysa-cto-my-znaem-o-zastrojke-territorii-i-sporah-gazpromnefti-s-arheologami/>

idential building of the 17<sup>th</sup> century, a copper foundry, a well, and bridge supports. A collection of household items has been put up, and evidence of the storming of the fortress by Russian troops in 1703 was also found. The archeologists discovered not only the mid-17<sup>th</sup> century fortress taken by Peter I, but also the earlier one, the first Nyenskans, the images of which are known from the relevant Swedish plans. Intact was found the 15–17<sup>th</sup> century cemetery where residents of the Russian-Izhora settlement of Nevskoye Ustye were buried (Fig. 3,4).

Nyenskans was erected on the site of Landskrona, a fortress built in 1300 and won in 1301 by the army of Veliky Novgorod. The wooden walls of Landskrona, its ditches and a donjon tower, and traces of the assault were all found, too (Fig. 5a-b). Thus, the archeological remains of Landskrona are a monument of medieval Northern European fortification architecture, unique not only for Russia, but also for Northern Europe.

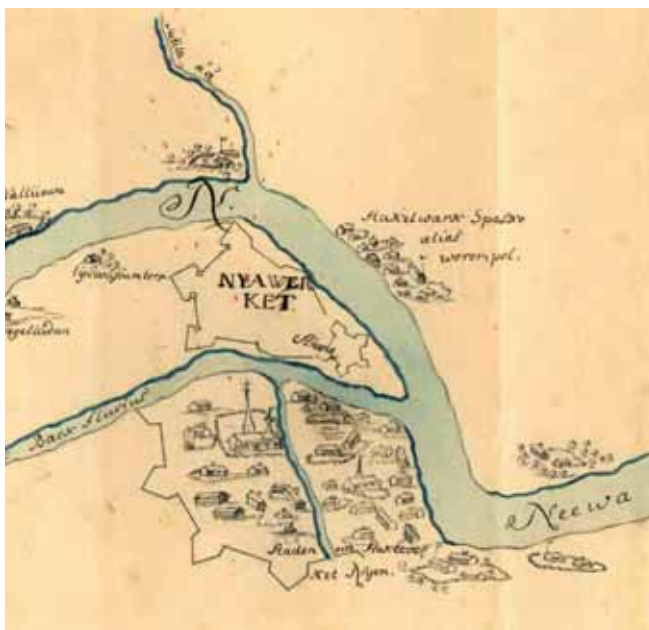


Fig. 3: Nyenskans: map of the town of Nyen and the Nyenskans fortress (2nd half of the XVII century, the State Archives of Sweden).

Source: <http://bashne.net/>



Fig. 4: Helmhelt Bastion of Nyenskans (excavations of 2006–2009).

Source: <http://bashne.net/>



Fig. 5 a-b: Landskrona: individual objects and the inside of the wooden donjon tower.

Source: <http://bashne.net/>

Before Landskrona, there was a cape settlement on the site. No written sources mention or describe it, hence the archeological findings dating to that period are of great value. Even more unexpected was the discovery of the largest Neolithic site in the North-West of Russia one level under the cape settlement. It was actively in use for about 2,000 years, with first people coming on the main site more than 5,000 years ago. It existed even before the Neva broke through from Lake Ladoga to the Baltic Sea. Archaeologists thus amended the geological history: it had been believed that the present Okhta Cape used to be the bottom of the Littorina Sea, but the findings prove that people lived here in that period.



Surprising was the state of preservation of objects that normally degrade in the soil quite quickly, such as wood, birch bark, or bones. The moist soils of the Okhta Cape protected organic matter from decay, and this preserved fragments of the village of primitive people, so now scientists can identify their diet, prey and harvest. Archaeologists have discovered more than 40 ancient structures – dwellings and utility rooms – and many smaller objects (Fig. 6). Thus, the Neolithic settlement on Okhta is a unique site for the north-west of Russia and one of the few sites of such a degree of integrity and authenticity in Europe (Fig. 7).



Fig. 6: A stone knife dating back to the Neolithic period. Source: <http://bashne.net/>

The head of the archaeological expedition, Pyotr Sorokin, refused to sign the act stating completion of examination of the Okhta Cape that would have given way to construction. After that he was suspended from works, and a more compliant specialist was appointed who completed the excavations and signed all that the customer required.

## Battle of assessments

For ten years Okhta Cape remained behind a giant fence. In 2011, a historic and cultural expert assessment recommended listing the Okhta Cape as a landmark of regional significance and giving most of the territory for construction, including residential function. Heritage preservation campaigners did not only challenge this expert assessment in court, but also made revoke authors' rights to perform expert examinations and evaluations.

An alternative expert assessment done by the All-Russian Society for the Protection of Historical and Cultural Monuments (VOOPIK) pointed out the need to fully preserve the immovable objects of cultural heritage (as required by Russian legislation). However, KGIOF refused to list the objects and the site, and the Ministry of Culture rejected both assessments.

In 2018, another assessment was presented, the author of which, the famous Kazan archaeologist Airat Sitdikov, considered it necessary to preserve only a small part equaling 15% of the total area of the monument. The document was recognized by Gazprom Neft, the Ministry of Culture, and the city's heritage protection bodies. Regional and city-level courts also relied on it as an officially approved expert evaluation, the purpose of which, according to Petr Sorokin and many other experts, was to justify the development on the Okhta Cape.

## Projects from scratch

In January 2020, Gazprom Neft announced the results of a closed architectural competition that the company organized for a project of a multifunctional office and residential complex to be constructed on the Okhta Cape. The winner Nikken Sek-kei (Japan) proposed full development of the cape except the above-mentioned 15% of the territory (or 0.8 hectares out of 4.7), which the Ministry of Culture approved on the basis of Sitdikov's paper.

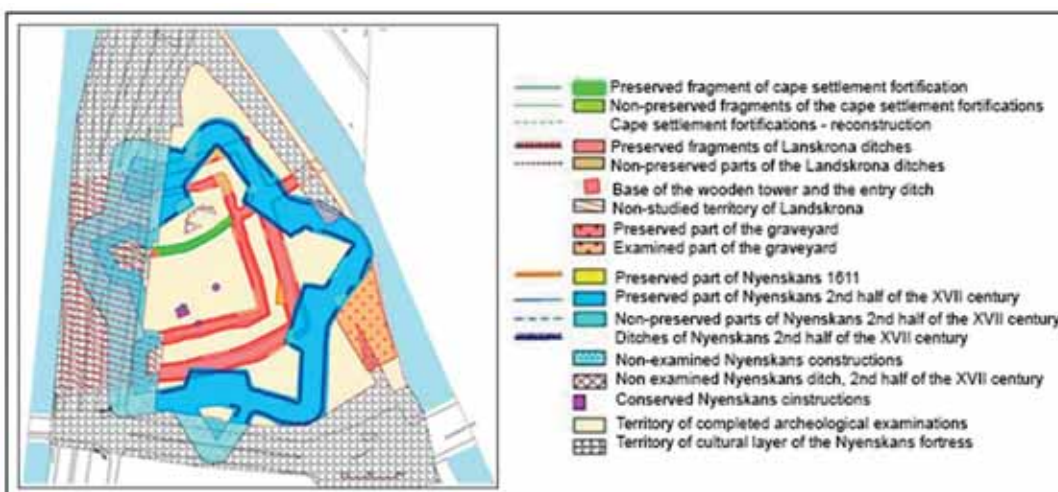
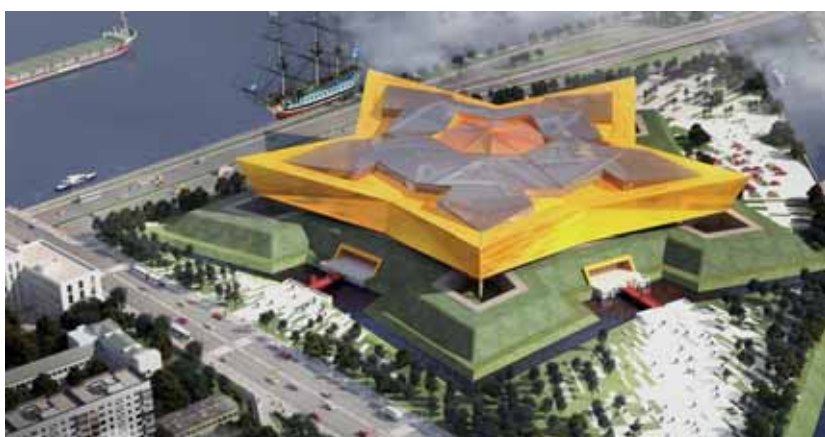


Fig. 7: Composite map of all archaeological finds on the Okhta Cape to the present date. Source: <http://www.icomos-spb.ru/>



While civil society continued to protest, contesting the expert assessment in courts, the architectural community claimed that the closed contest affected greatly the results, bringing forward a project that did not respect the nature of the site (while one of the contestants, for instance, the German bureau Ingenhoven Architects, in consortium with c ABD Architects, presented a project with a museum component in the base levels). It should also be noted that the site lies within the boundaries of the WHS and is in direct visual and structural connection with the historic center of Saint Petersburg and its major architectural nodes, such as the baroque masterpiece of the Smolny Cathedral across the Neva. Hence, a particular attention to the architectural project is vital here (Fig. 8a-d).

Gazprom Neft comments on the situation saying that “The company committed itself to the preservation of all cultural heritage sites on its site. These are four buffer zones with an area of 0.8 hectares, approved by the Ministry of Culture of the Russian Federation. In accordance with Russian law, all cultural heritage sites on the Okhta Cape will be preserved. There will be no construction in these areas. Monument zones will be integrated into the landscape park, and everyone will have free access to them”.

### Sudden Changes

Quite unexpectedly, in December 2020, at a meeting of the Human Rights Council under the President of the Russian Federation, Vladimir Putin was addressed by one of the founders of the Moscow heritage NGO Arkhnadzor, Konstantin Mikhailov, who proposed creating an open air archeological museum of European significance on the Okhta Cape instead of yet another office building. Surprisingly enough, Putin supported the idea of a museum on the site. The President issued an instruction to consider the creation of an archaeological and historical reserve on the Okhta cape, and to submit relevant propos-

Fig. 8a-d: In the meantime, a number of architectural concepts of a possible archeological museum have appeared

Source: <https://www.rbc.ru/> Fig. 8 a and b – Studio 17  
Fig. 8c – architect Elena Melnikova, Fig. 8d – Studio AMM

als until May 1. It was addressed to the Minister of Culture of the Russian Federation Olga Lyubimova, the Governor of St. Petersburg Alexander Beglov, and the head of Gazprom, Alexey Miller.

The public discourse has rapidly changed, from articles in press to comments of officials. However, the threat of the above-mentioned officials proposing an archeological park within the boundaries of the existing site, as defined in Sitdikov's assessment, remained.

In early April, the Kuibyshevsky District Court of St. Petersburg issued a ruling on action of preliminary protection in an administrative claim of the St. Petersburg campaigners. After making sure that Landskrona's facilities currently lack any protection status, the court forbade the KGIOP to issue conclusions on compliance with the land use regime for works related to deepening more than 0.5 m, within the boundaries of Landskrona. The issue is of fundamental importance, since for the first time the court considered the plans of the borders and some factual circumstances of the case. Prior to that, the courts refused to do this, referring to the abstract and normative nature of the acts in question.

In relation to the above, **civil society actors, the heritage preservation community and the professional architecture and urban development community call upon the Committee to declare in the annual Decisions and urge the Russian Federation to:**

1. List all historic and archeological properties and objects of the Okhta Cape, including a balanced buffer zone, according to the Russian legislation and on the basis of the expert assessment of the All-Russian Society for the Protection of Historical and Cultural Monuments (VOOPIK) and the arti-

cles of Cand. sc. hist. Pyotr Sorokin, senior research officer of the Institute of History of Material Culture.

2. Recognize the site of the Okhta Cape, which currently falls within the definition of the boundaries of the component 540-029 of the UNESCO WHS 540, as a separate component.
3. Organize an open international architectural contest for multidisciplinary teams of architects, town-planners, landscape architects, archeologists and museum engineers, to design proposals for the new historic and archeological landmark of European significance in Saint Petersburg with authentic artefacts and exhibits covering the period from Neolithic era to the XVIII century.

### Post scriptum

On 29 April 2021 the Governor of Saint Petersburg, Alexander Beglov, announced the creation of a new composite archeological museum to span over several spaces around the city. He explained that the project has already been approved by Gazprom Neft and that it will include a 1,500 m<sup>2</sup> exposition about the history of the Okhta Cape. That means that a comprehensive archeological park with authentic historic elements is to be bartered away for a series of showcases. It must be assumed that the plan is to keep to the construction project chosen by Gazprom. The court has vetoed any land work on the site in April stating that "the lack of a protective status of the remains of the Landskrona fortress fortifications contradicts the obligatory act of the President of the Russian Federation". However, it looks like no notice has been taken of that by the city authorities. Should the chosen project be realized, the absolute most of the genuine historic tissue dating back to the XVIIth, XVIth, XIIIth centuries AD and 5000 BC will be lost forever.



# Continuing Destruction of Historic Buildings in Vienna

Herbert Rasinger, Initiative Stadtbildschutz Wien



In 2001 the historic center of Vienna was admitted to the UNESCO World Heritage List: The City pledged to protect its monuments, however, is no longer living up to its international legal obligation. Four examples are given below to demonstrate the City of Vienna's lack of respect in handling historic monuments:

## 1. Saint Charles Church

The Saint Charles Church, dedicated by King Charles VI (father of Empress Maria Theresia) to the patron saint Charles Borromäus against the plague of 1713, was built in 1716 – 1739 by the most famous baroque architects Fischer von Erlach (father and son) on the bank of the river Wien outside of the walls around Vienna. In front of this church is a popular lovely park framed in by the Technical University on one side, and the "Winterthur" insurance company building, as well as the History Museum of Vienna on the other.

Despite public protest, permission was granted by the City Council of Vienna to almost double the height of the two neighboring buildings of St. Charles Church thereby heavily spoiling the whole scenery (Fig. 1).



Fig. 1: The Ressel Park framed on the left side (Eastern side) of the Saint Charles Church by the Vienna Museum and the "Winterthur" insurance company building, both of them will be allowed to build a superstructure above the existing building as shown by the red lines.

Photo: Martin Kupf

## 2. The Vienna Museum

Dating back to 1959 and designed by local post-war architect Oswald Haerdtl, the Vienna Museum was classified as a historical monument and thus brought under legal protection. Nevertheless, permission was granted by the city authorities to add a new super structure on top of the existing building. In addition, a spacious pavilion with a restaurant will be placed in front of the museum causing a considerable loss of parkland.



Fig. 2: The Vienna Museum was declared to be under protection of the Monument Protection Act. Nevertheless the Federal Monument Authority allowed the complete dismantling of this monument as well as the removal on October 30, 2019 of the tree No. 26 *Pterocarya fraxinifolia* (Caucasian wingnut) the largest and oldest tree between the pond of the Ressel Park and the Vienna Museum, planted in 1958. The greenery of the park will be scaled down and replaced by concrete.

Photo: Initiative Stadtbildschutz

## 3. The Heumarkt - Hay market

For more than 150 years the former hay market ("Heumarkt" in German) served for the Viennese public as a sporting ground, notably in winter as an ice skating rink. The City of Vienna re-dedicated this sports field / ice skating area suddenly on June 1<sup>st</sup>, 2017 as a building area for high-rise buildings!

A 66.3 m high tower can now be built on the Heumarkt site around a hotel with a height of 46.3 m – even higher than the current 38 m building height. This caused the UNESCO WHC to put Vienna on the list of heritage in danger in July 2017.



Fig. 3: Rendering of the view from the Upper Belvedere to the historic center of Vienna with the rendering of the enlarged Hotel InterContinental and the convention center marked with red lines. This Plan B was revealed to the public in 2021.

Photo: Initiative Stadtbildschutz

The man behind this real estate deal is the real estate tycoon Mr. Tojner whose company bought 9,700 m<sup>2</sup> of this land plot for a very cheap price. He wants to make money by using this plot of land for a high-rise hotel building and a convention center. The City of Vienna approved his plan, neglecting completely its own management plan submitted to the UNESCO WHC in 2006 which clearly states that high-rise buildings are not allowed in World Heritage zones.

The city government has made a great gift to Mr. Tojner by legally allowing him on 1st of June 2017 to erect this 66,3 m tower together with a 47,3 m high hotel (Plan A) on a plot of land where no building construction was allowed before. This gift violated the management plan of 2006. The City government deliberately maneuvered itself in a difficult position towards UNESCO.

The City government therefore pushed ICOMOS to approve the real estate development project **Plan A**, but finally failed. It then submitted to ICOMOS a revised real estate project without the 66,3 m tower but with additional buildings with increased building heights of 55 m (**Plan B**) instead of 47.3 m (Fig. 3,4).

Plan B actually means an increase to 217% of the construction volume above ground compared with that of the existing buildings (104.870 m<sup>3</sup> à 227.930 m<sup>3</sup>). This Plan B was also rejected by ICOMOS, arguing that any new building higher than the existing 38 m will harm the famous Belvedere view and will be detrimental to the Outstanding Universal Value of the historic centre of Vienna.

Plan A and Plan B and a possible new Plan C will entail the loss of the green area in the densely built-up area. Surprisingly, the city government also allowed Mr. Tojner to build a new road on the green surfaces.

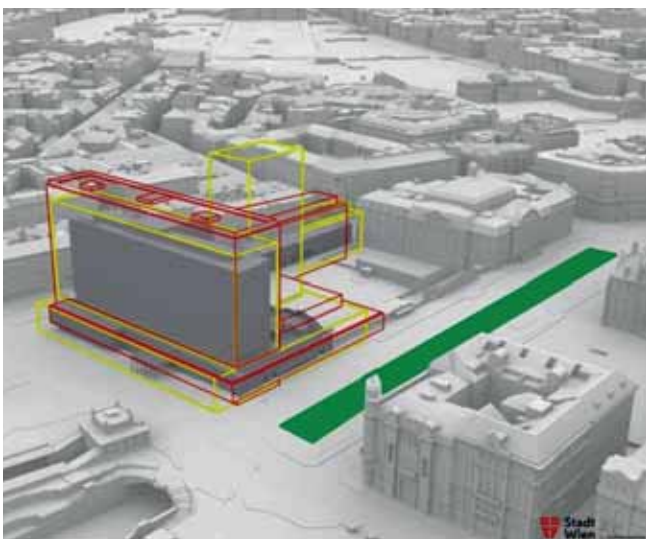


Fig. 4: The existing buildings are shown in grey, the Plan A in yellow and Plan B in red lines. A new road is planned to be built by the real estate tycoon on the above shown existing green space.

Graphic: Stadt Wien

#### 4. House at Bauernmarkt 1

The house at Bauernmarkt 1 is a residential building built in the early 18th century in the beautiful baroque style. It is located behind St. Peter's Church and only 130 m from the Stephansplatz, the city center.

This building is historically significant because it is the first one that a Jew was allowed to own. At the turn of the 17<sup>th</sup> to the 18<sup>th</sup> century, Samuel Oppenheimer supported financially the Habsburg Emperor Leopold I in his fight against the Ottoman empire. He had his office in this Baroque building. Since he was Jewish, he was initially not the recorded owner in the land register. His son Emanuel Oppenheimer sold the house in 1705. The Jewish Wertheimstein family bought the house in 1847. The catholic Maria Böhm bought the house in 1872 and bequeathed it to the Vienna Citizens Hospital Fund.



The City of Vienna used an ordinance issued by Nazi prime minister Seyss-Inquart on September 3, 1938, and registered itself as the owner of the house without making a payment to the Hospital Fund. After the fall of the Nazi regime, the City did not return the house to the original owner. Instead, under the then City Councilor for Housing and the later Chancellor Faymann, it sold the house to real estate tycoon Mr. Lenikus in 2001.



Fig. 5: In the foreground the destroyed baroque roof truss. The Federal Monuments Authority as well as the City of Vienna allowed the real tycoon owner to dismantle the original historic roof construction of the Bauernmarkt 1 building in the Historic Center of Vienna.

Photo: Initiative Stadtbildschutz

The baroque house with one of the last baroque roof trusses in the city center should be under monument protection by decision of July 30, 2002 of the Federal Monument Authority. Instead of conserving the historic roof construction, the World Heritage Commissioner of the City of Vienna, Mr. Zunke, announced on February 29th, 2016 that the destruction of the roof construction of the Bauernmarkt 1 building is legal. Now, despite the monument protection law, the baroque house suddenly has an attic with two (!) attic floors (Fig. 5). Now the roof structure has huge glass walls in the rear instead of the original roof. These modifications are not at all compatible with the original baroque architecture of the building.

## 5. Künstlerhaus (“Artists’ House”)

But there are also good news: the former manager of a construction company, Mr. Haselsteiner, paid for the renovation of the “Künstlerhaus”, an art exhibition hall. This building has been perfectly refurbished and now houses the “Albertina Modern” exposition.



Fig. 6: Front view of the Künstlerhaus, an exhibition hall for artists, beautifully renovated by a former manager of a construction company. For inside details, see [www.k-haus.at/kuenstlerhaus/album/online-angebot/](http://www.k-haus.at/kuenstlerhaus/album/online-angebot/)

Photo: Initiative Stadtbildschutz

## International response

This neglect of the protection of an UNESCO world heritage site by the City of Vienna was a topic in the news of the Japanese state television NHK on 15 October 2020, notably featuring the historic view from the Belvedere Palace down to the city center.



Fig. 7: Headline: World Eyes, Austria: Real estate development threatens world heritage.

Photo: Initiative Stadtbildschutz / NHK

## Recommendation

The above mentioned examples are part of the core zone of the “Historic Center of Vienna” UNESCO World Heritage site. The municipality of Vienna submitted to the UNESCO WHC its management plan of 2006 that stipulated that no high-rise buildings may be built in a World Heritage zone. The City of Vienna should abide by its own management plan of 2006.

Since the world heritage site comprises only 2% of the surface of the city of Vienna, there is ample space for great real estate development projects outside the World Heritage property.



# The State of Venice and its Lagoon with Reference to the Recommendations of the Advisory Mission of January 2020

Franco Migliorini, *Tutta la Città Insieme!*



The Site “Venice and its Lagoon” was inscribed in the World Heritage List in 1987. Since then monitoring on the state of the site was started according to the general criteria established by UNESCO for its preservation.

Two of the main current items are first the impact of big cruising ships on the lagoon ecosystem, particularly related to the transit through the San Marco basin surrounded by its monumental heritage; secondly the increasing pressure by industrial tourism on the residential stock and on the everyday life of Venetians.

In 2017 a very controversial and uncertified decision by the inter-ministerial “Comitatone” (i.e., committee) for Venice tried to allow the berthing of cruising ships in the industrial dock area of Porto Marghera as an alternative to the San Marco transit (Fig. 1). This assumption was surprisingly “welcomed” by the World Heritage Committee 2018 in its Draft Decision 43 COM 7B.86.



Fig. 1: The proposed new Canale Contorta and Vittorio Emanuele cruise ship routes.  
Source: <http://maritime-connector.com/>

It is solidly substantiated that the document sent by the Italian Government to UNESCO in Paris has distorted the prescriptions and the auspices of that Draft Decision (Recommendation 7) and is surely both lacking information and containing wrong information due to the pressure of cruise companies interests together with those of their local economic operators.

On the 43<sup>rd</sup> Session of the WH Committee in July 2019 in Baku, none of its members took into consideration the documents presented to re-establish the truth about the risks of shipping access in the lagoon, as clearly demonstrated by two cruise ship accidents in the San Marco basin in summer 2019 (during the Committee meeting!).

On January 2020, a new Report drafted by a Joint UNESCO/ ICOMOS/Ramsar mission to Venice made 50 recommendations to fix the state of the Venice WH Property. We want to shortly answer on the status of the specific subjects the recommendations are related to, outside of any official diplomatic relationships or specific interest other than the truth.

## Our answers to the WHC joint mission

*(Numbering based on the 2020 Mission's recommendations)*

R. 2/3/4/5/6/7: Currently no progress has been made towards the creation of a specific Road Map to guide the elaboration of specific and formalized Action Plans, or of a Master Plan for the entire property. Moreover, no Steering Committee has yet been established for overall governance. The entire decision-making system falls within the specific regulatory municipal town-planning powers and the higher level national and regional provisions – regulatory and planning – for the safeguarding of the historical, cultural and environmental heritage. These sets of laws also limit the participation of citizens and associations. No specific indicators for the protection of the property have been elaborated thus far.

R.: 13/14/16/. The proposed Buffer Zone, considering its vast extension, can count only on the limited powers of the metropolitan city of Venice and on the greater powers of the individual municipalities which constitute it. The latter are all subject to ordinary legislation and not to the specific values linked to the OUV of the property. EIA and HIA procedures, however, are carried out only for the cases envisaged by the ordinary legislation.

R. 19: Urban development has never been subject to competitive procedures.

R. 20: The City of Venice is totally committed to the reclamation of the industrial area of Marghera for the recovery of areas for industrial, urban and environmental use. The procedure to access the EU Recovery Plan to obtain extraordinary funding for the reclamation is currently under way.

R. 22: The entire area between the Mestre railway station and the initial part of the bridge across the lagoon has been set aside for intensive development, with a planned railroad transport hub in San Giuliano which will connect to the industrial docks of the Canale Nord to provide “provisional” docking facilities for cruise ships. This will create a vast area dedicated to recreational tourism on the lagoon, with high-rise buildings to compensate for the costs of reclaiming the polluted land on which they will be built (Fig. 2). This development plan includes the 50 hectares of the “Pili” area, owned by a company belonging to the Mayor of Venice, which has been merged pro tempore into an English-style blind trust. The City Council has already raised the issue of a potential conflict of interest.

R. 24: The planned development of the Marco Polo airport, included in the Buffer Zone on the edge of the lagoon, envisages a considerable increase in traffic (11,5 mln pax in 2019). In fact, the Master Plan of the owner company – SAVE – includes the construction of a second runway, parallel to the existing



Fig. 2: In a recent decision related to the buffer zone, the local administration has allowed a residential tower of 70m and 22 storeys, almost three times higher than the height proposed by the 2020 Joint Mission to Venice.

Photo: Corriere del Veneto, 5 May 2021

one, but towards the hinterland (see (Fig. 3). On the basis of this anticipated increase in traffic, a project was presented in May 2020 for the construction of a railway line and a station for high speed trains at a depth of 12 metres under the airport with foundations extending to 33 metres (Fig. 4). The project was subject

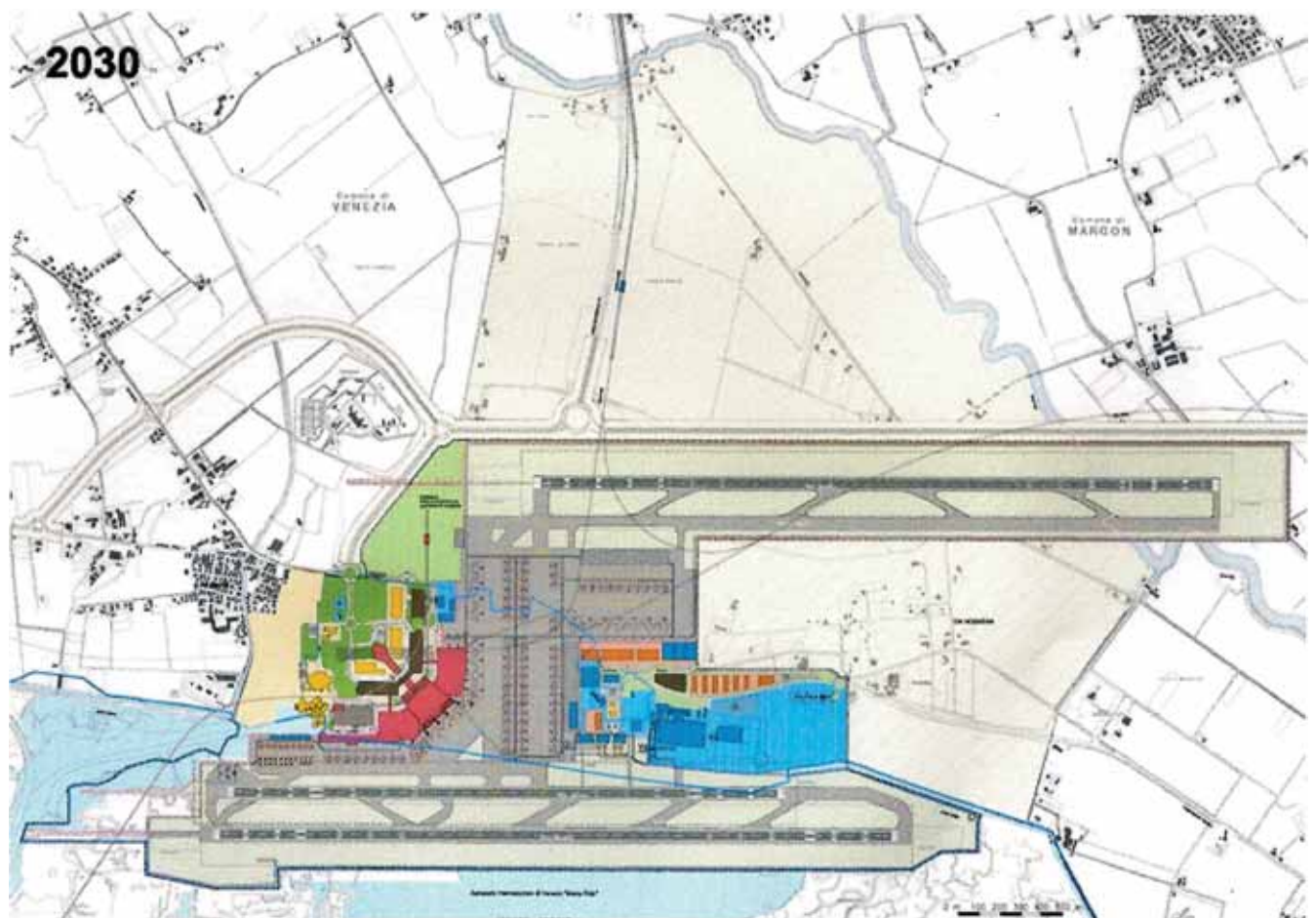


Fig. 3: Plan for a second runway of Marco Polo Airport, Venice.

Source: Master Plan for the Development of Venice Airport (Società Aeroporto Venezia SAVE), in <https://www.perquarto.it/wp-content/uploads/2015/04/volantino-aeroporto-xq-def.pdf>



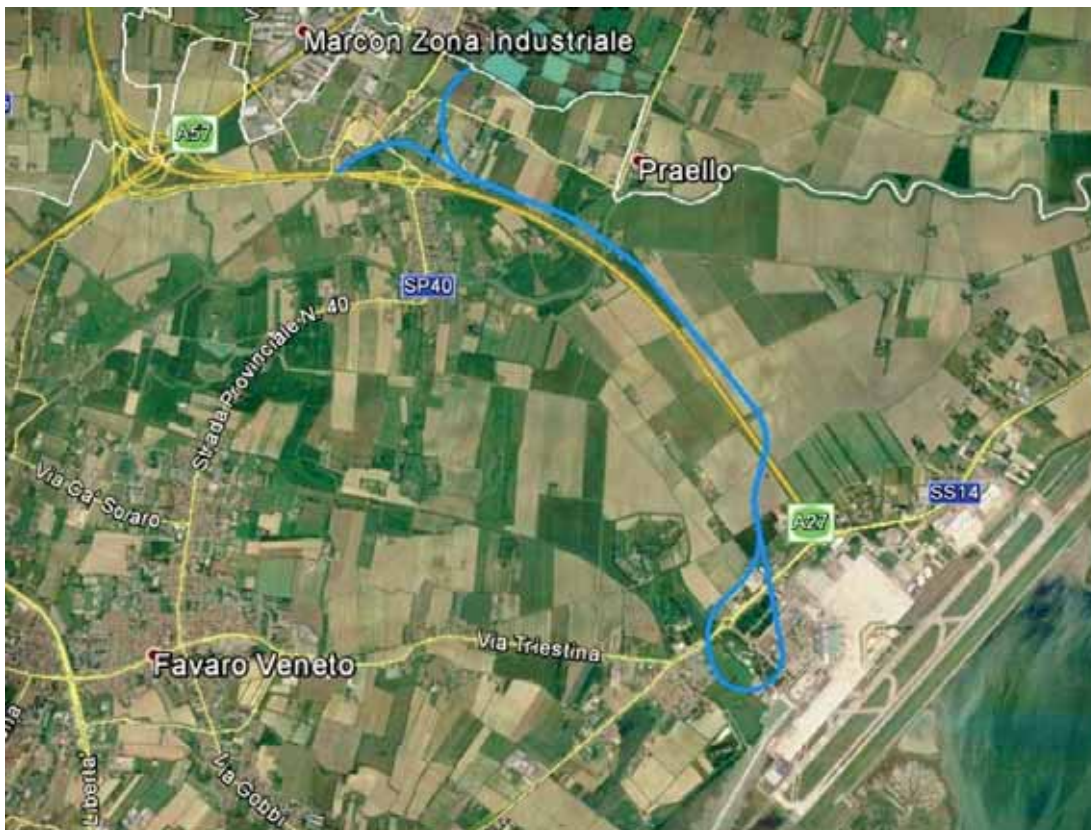


Fig 4: Route of the planned high-speed rail tunnel approved in 2020.

Map: Franco Migliorini from <https://www.veneziatoday.it/cronaca/collegamento-ferroviario-rfi-cappio-aeroporto-venezia.html> 10 June 2020

to a regional EIA procedure solely for landscaping aspects and was approved in autumn 2020 by the Region of Veneto. The aim of the 500 million Euro project is to attract the greatest number of travellers possible to support the construction of the second runway for doubling the number of passengers.

R. 32/33/34: After the collapse of the tourism economy due to the pandemic crisis, there are strong expectations that the sector will rebound, with the greatest priority being the recovery of Italian and foreign tourists during the period 2021–2023. In order to monitor access to Venice, the administration intends to implement a ticketing system, turnstiles to filter entry and the presence of stewards, while a Control Room should communicate the quantity of visitors in real time by means of electronic counting. The proposal for an innovative demand-supply system based on booking visits, estimation of arrivals and the programming of services; namely, a system based on sustainable tourism market logic, has, however, been rejected.

R. 38: During 2020 the overall population of Venice fell by 3,151 people or 1,21%, almost threefold the number registered in 2019. The decline in population was 1,7% in the lagoon area against 1,0% of the mainland. However, in comparison with 2019 figures the demographic decline has accelerated by 0,46%, i.e. six times that in 2019. As far as the housing situation is concerned, there are an estimated 10 thousand vacant

dwelling in the city, about 8% of the city's total housing. Of these, 8 thousand are private homes used for short-term lets on Airbnb, 5 thousand of which in Venice itself and 3 thousand in Mestre, while 2 thousand public housing units are vacant due to a lack of maintenance and limited pressure for repair. Thus, the search for housing has become more and more difficult for Venetian citizens.

R. 43: The monitoring of waves produced by existing traditional marine engines is an occasional unpopular activity exercised together with its containment and substantially limited to the main inner city canals but not around the city. Very few alternative engines are in use in local transport boats, but the production of waves is strongly related to commercial sensible speed factors and to the bottom profile of boats which generate waves proportionally to the boat speed. The intensity of wave production, mainly by water taxis, is strictly related to the intensity of tourist presence and mobility demand.

R. 48/50: In 2020, the *Modulo Sperimentale Elettromeccanico* (Experimental Electro-mechanic Module, Mose) flood control system started to be in function in a provisional / experimental way, even before the final inspection, with the first + 1,30m tides of the year associated with limited meteomarine (wind/maritime storm); as expected with direct negative operational and economic impact on harbour activities and with potential effect also



on the lagoon ecosystem. This issue was widely described in January 2020 by the “Associazione Ambiente Venezia”. The letter they sent to the Venice Site Office of UNESCO represents a satisfying and detailed description of the Mose operational system and its deficiencies. Further we can now add the very high

operational cost of its functioning, requiring around 100 personnel and a relevant electric power cost. As concerning the impact on the lagoon’s hydrology and morphology, no monitoring system was put in operation even if this represents a relevant item for the lagoon hydrology’s stability and ecosystem vulnerability.

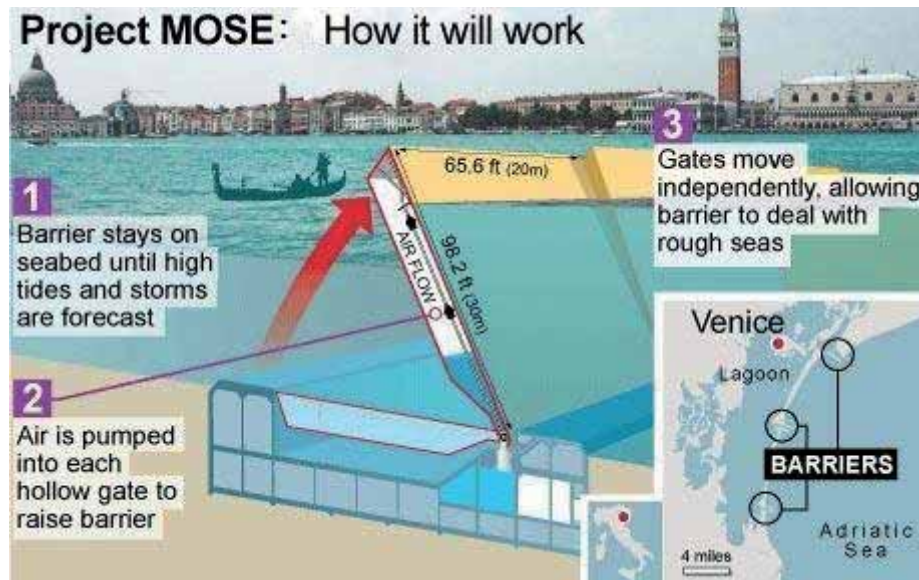


Fig. 5: Schematic illustration of the Mose flood control system.

Source: [www.italy.org/magazine/focus/facts-stories/article/how-italian-technology-trying-save-venice-mose-project](http://www.italy.org/magazine/focus/facts-stories/article/how-italian-technology-trying-save-venice-mose-project) September 23, 2009

## Our conclusions and recommendations

Being informed citizens with a professional background on urban policy and environmental values, we think that the City of Venice and its Lagoon need international attention for its preservation. The industry of international tourism, provisionally stopped by the pandemia, has a clear strategy for using the

whole UNESCO site as a factory of tourism supply with a huge potential of a worldwide demand which meets many local short-term interests to make the city fit for tourism business where the cultural values are used and sold for mercenary incomes. Any critical concern may be helpful for drawing international attention on this.

# Protecting Valletta, Manoel Island and Marsamxett World Heritage

Astrid Vella, Flimkien għal Ambjent Aħjar



Fig. 1: The Valletta skyline from Grand Harbour showing the Sliema tower beyond.

Photo: Astrid Vella

Flimkien għal Ambjent Aħjar (FAA), an NGO working to protect Malta's heritage and environment, is concerned about the Valletta UNESCO World Heritage Site and Manoel Island in Marsamxett Harbour, which is included in the UNESCO World Heritage Tentative List as it forms part of the Knights' Fortifications around the Harbours of Malta (no. 982).<sup>1</sup> (Fig. 1)

The Sliema coast of Marsamxett Harbour is undergoing intensive speculative development including tall buildings, some of them rising to over 44 storeys; the first completed towers are already intruding on Valletta's Renaissance skyline while others are under construction.

Even more worrying is the speculative development taking place on the heritage, hallowed ground of Manoel Island, just 245m from Valletta's bastion walls. Positioned in the centre of a former Roman port, this island is rich in archaeological remains as well the site of Europe's oldest surviving lazaretto, numerous cemeteries and Malta's finest Baroque fortress.

Manoel Island was leased to MIDI developers in 2000, and the latest plans include adding an extra floor over the scheduled lazaretto building in order to maximise the commercial potential of the quarantine hospital which had housed Lord Byron, Sir Walter Scott, Horace Vernet and Alphonse de Lamartine. Close to the mainland, a massive complex of commercial outlets and apartments is to rise six storeys high, completely block-

ing views of the iconic Valletta and Floriana fortifications, as well as blocking views of Manoel Island's heritage structures. (Fig. 2 and 3)

The MIDI project is not necessarily limited to the construction of over 300 apartments as well as commercial outlets and a hotel in Fort Manoel. One cannot rule out further high-rise development after the first phase of this project, as MIDI had done at its development that has engulfed nearby Fort Tigné, the subject of the 2006 objection to UNESCO.

These concerns were already raised when in 2006 UNESCO was informed of the threat posed by MIDI's Sliema tall buildings, following which UNESCO called on the Maltese authorities to establish a buffer zone, but this has been ignored.



Fig. 2: MIDI Blocks obliterating promenade views of Valletta's WHS fortifications.

Image: MIDI EIA

<sup>1</sup> <https://whc.unesco.org/en/tentativelists/982/>



Fig. 3: Obstruction of views of Valletta WHS due to proposed MIDI project blocks.

Image: Jorg Sicot

The gravity of the situation can be understood when one appreciates the area's heritage value, revealed in UNESCO documents and Management Plan:

### Manoel Island

"Valletta is located on a peninsula between two of the finest natural harbours in the Mediterranean. The Siege of Malta in 1565 captured the European imagination and mobilised the resources needed create the new city of Valetta... The Knights of St John, aided by the finest 16th century European military engineers," ... built and fortified Valletta."<sup>2</sup>

However, the building of Valletta opened the Knights to new dangers, and already in 1569 concerns were being raised that if it fell into enemy hands, the small island posed a threat due to its close proximity to Valletta's walls. Manoel Island had an important role well before it was eventually fortified as from 1526 onwards, Marsamxett Harbour began to be used for quarantine purposes. In 1643, the Knights of St John built a permanent Lazzaretto to cope with epidemics, and a second block was built in 1670. The Lazzaretto hospital saw a lot of use during the plague epidemics of 1813, 1865 and 1937, also served as a military hospital for British, French and Italian soldiers during the Crimean War and again during WWII.

Part of the Lazzaretto was used to fumigate incoming mail, while nearby stone barns were used to quarantine imported cattle, such was the vital importance of the quarantine process.

By 1733 the Knights had built Fort Manoel, which now forms part of the UNESCO World Heritage Tentative List (no. 982) being the jewel in the crown of the Knights' network of fortifications around the Harbours of Malta. By the end of the eighteenth century, the Hospitaller Knights had created a vast network of fortifications, the whole harbour area had been transformed into one huge fortress with the city of Valletta as its inner keep. In 1800, the British inherited this vast complex of fortifications and continued to augment and modify it as technology advanced and the range of attackers' guns increased. These fortifications are unique not only for their sheer scale, totalling some 25 km in length, but also because they document the development of the art and science of gunpowder fortifications through nearly four centuries.

Fort Manoel is the one site that best fits the description of a Baroque fortress largely because of the way in which it brings together the different aspects of engineering and art to create a functional and beautiful work of fortification. For the design of Fort Manoel, as in any Baroque fortress worthy of its name, was not only concerned with functionality and military efficiency, but also, equally importantly, with aesthetic appeal. Built to the designs of the brilliant French military engineer Sebastien le Prestre de Vauban who perfected the bastioned trace, Fort Manoel became the model for many French fortifications built outside France.<sup>3</sup>

<sup>2</sup> <https://whc.unesco.org/en/list/131>

<sup>3</sup> Spiteri, Stephen C. (2014). "Fort Manoel". ARX Occasional Papers <http://www.militaryarchitecture.com/index.php/Journals/arx-fort-manoel-occasional-papers-4.html>



## Valletta's Outstanding Universal Values

**“Criterion (i):** Valletta is an ideal, grid-plan late Renaissance city, with its fortified and bastioned walls modelled around the natural site and many great monuments.

### Integrity

Built on a narrow peninsula surrounded by water, the perimeter of the city has remained largely unchanged since the departure of the Knights of St John. It is of sufficient size and includes all elements necessary to express its Outstanding Universal Value. Most of the original monuments and the surrounding urban fabric has been preserved intact or carefully restored, **however the Outstanding Universal Value of the property is vulnerable to impacts on its setting**, form and fabric, deriving from the demands of a living city. (Fig 4)



Fig. 4: View of the Valletta fortifications.

Photo: Tafermine Studio

Valletta has remained the capital of the island; the property essentially retains its skyline from the 16th century, reflecting the natural topography of the peninsula; however, **this is vulnerable to development pressures resulting in the increase of building heights.**<sup>4</sup>

## Protection and management requirements

Valletta is a living city, so administrative and commercial communities “exert heavy demands on the institutional bodies entrusted with safeguarding, conserving and enhancing national monuments... To sustain the Outstanding Universal Value of the property, a draft Management Plan for the city was prepared in 2012... The adequate implementation of the Management Plan requires collaboration among key entities... **as well as clear policies on height controls to protect the city's skyline and streetscapes, on the extent of the control area for building heights and on view sheds outside the walled city.**”<sup>5</sup>

In 1980, when Valletta was inscribed on the World Heritage List, the nomination papers did not specify a boundary for the proposed site, either on a map or by description. There is no

ambiguity because the fortified peninsula is distinct geographically and the site includes the fortifications.

However, in 2009, the World Heritage Committee further examined the lack of boundary definition of the City of Valletta. The Periodic Reporting Document of 2006 highlighted issues as potential risks towards the Capitals World Heritage Listing which were confirmed by the World Heritage Committee in its 2009 **Decision 33 COM 7B.113**:

### “The World Heritage Committee,

1. **Having examined** Document WHC-09/33.COM/7B,
2. **Notes** the boundary definition of the property as provided in the report by the State Party;
3. **Requests** the State Party to:
  - d) Provide a clear map showing the boundary of the property,
  - e) **Establish a declared buffer zone** in accordance with Paragraph 103 of the Operational Guidelines, with height controls around the property as a means of protecting the skyline configuration of the city and prepare a “**Views and Vistas Analysis**” from strategic points within and outside the property,
  - f) Establish clear policies in relation to height controls within the property as a means of **protecting the skyline configuration of the city, by means of a “Views and Vistas Analysis”** covering key areas and streetscape,
  - g) Submit detailed information on the proposed large-scale developments within the property to the World Heritage Centre in accordance with Paragraph 172 of the *Operational Guidelines*;
4. *Also requests* the State Party to submit to the World Heritage Centre, by **1 February 2010**, a state of conservation report on the issues above and in particular on the progress made with the **establishment of a buffer zone** and height controls within the property, together with information on the proposed large scale development projects.”<sup>6</sup>

Flimkien għal Ambjent Aħjar maintains that the blocking of one of Malta's two finest heritage vistas – the Marsamxett side of Valletta's UNESCO World Heritage Site fortifications and skyline by a speculative project, violates the most basic norms of heritage protection and values. FAA calls for enforcement of UNESCO's decision above, which not only demanded a buffer zone but also required a “Views and Vistas Analysis from strategic points within and outside the property” which would serve to protect these views which are about to be obliterated.

The MIDI developers do not have a reputable track record in respecting heritage. Neither Fort Tigne nor Fort Manoel, entrusted to them, are open to the public following their restora-

<sup>4</sup> Valletta's Outstanding Universal Value from the World Heritage inscription: <https://whc.unesco.org/en/list/131>

<sup>5</sup> <https://whc.unesco.org/en/list/131>

<sup>6</sup> <https://whc.unesco.org/en/decisions/1905>



Fig. 5: Fort Tigne, engulfed by MIDI's The Point Project.

Photo: Astrid Vella

tion. Part of Fort Tigne, a milestone in modern fortress-building, has lost all legibility, engulfed in MIDI's Tigne Point mall and residential complex. (Fig. 5)

At Manoel Island, MIDI's Environment Impact Assessment was challenged by FAA and subsequently annulled by Malta's Environment and Planning Review Tribunal (EPRT) due to serious issues of conflict of interest of the consultant who drew up the heritage section. By the time the appeal was decided, MIDI had demolished one of the 'Bovile' cattle quarantine sheds, which stood in the way of MIDI's planned development. Subsequent archival research confirmed that the Bovile had heritage value and should never have been demolished. (Fig. 6)



Fig. 6: MIDI – destruction of the Bovile heritage animal quarantine barn.

Photo: Donald Rebello

Roman pottery was also discovered around the Gzira shoreline during various surveys, including those carried out by the Royal Navy's fleet clearance team in the 1950s. However, a 2013 site study by Stefano Forlani was not included in the assessment of the permit for the project. Plans to build a new bridge extending from Manoel Island to the Gzira promenade will destroy the remains, as the widening of the canal between the two areas will involve 3-metre-deep excavation into the sea-bed where submerged Roman rectangular cuttings in the rocks are thought to be the oldest human remains in the area, according to renowned archaeologist Reuben Grima. Further along this south shore lies a submerged dump from the Lazzaretto and quarantine ships which is known to be rich in 17-19th century remains but would be swept away by dredging for MIDI's proposed yacht marina.

Flimkien għal Ambjent Aħjar maintains that these vistas and features evidently merit scheduling, and urges UNESCO to take urgent action to prevent this unacceptable destruction of our common heritage.

# The Bypass Road of Gjirokastra – Short-term Effects vs. Sustainable Solutions

Kreshnik Merxhani

## The need for a bypass

The case of the Bypass road in Gjirokastrë is highly related to efforts for removing motorized vehicles from the bazaar area of the town right in the heart of the historic center (Fig.1). Due to its function as the node of public and commercial life of the town, the bazaar is also the node of transportation routes. From its central spot (the so-called “neck” of the bazaar), five roads connect it with five different neighborhoods, and if the transportation will be removed from there, due to the mountainous terrain this will naturally cause a problem in communication between all these five neighborhoods.



Fig. 1: The bazaar of Gjirokastrë and the streets from neighborhoods that end there.

Photo: Kreshnik Merxhani

For this reason in the regulatory plan of 1974 the idea to remove automobile traffic from the bazaar was addressed with a proposal to create different ring-roads around the buffer zone and as well to improve the existing network within the historic ensembles in historic center and in some places to create short-cut roads with low impact toward historic landscape. The regulatory plan was then designed with the collaboration of the Institute of Monuments.

The falling of communist regime left this plan unfinished, and with the new conditions it was also exposed to needs that were not predicted in the drafting time when there were virtually no motorized vehicles and no tourists in Albania. The historic cobblestone roads of Gjirokastrë, which are a key feature of its urban landscape, have been constructed for pedestrians, horses and carts but have seriously deteriorated under the heavy load of hundreds of cars, trucks and busses that pass over them every day. Since Albania started recovering from its state collapse in 1997-98, sharply increasing traffic has made traffic jams a regular phenomenon in the steep and narrow streets

with their sharp corners, and has made it unpleasant, to say the least, for pedestrians to walk in the streets.

Still the ring road system has some value since it can help a lot to reach upper neighborhoods without disturbing the historic center and it can help as well for emergency transportation, delivering goods or bringing tourists to hotels and restaurants in the residential quarters.

The problem of traffic and circulation was addressed as well in the nomination dossier for UNESCO in 2005.<sup>1</sup> Later on, from 2009 till now we have seen a row of different variations<sup>2</sup> to solve this problem but unfortunately none of them was in line with the historic values of the world heritage property. In 2010,

1 Traffic and Circulation <http://whc.unesco.org/uploads/nominations/569bis.pdf>, Page 276

2 <http://planifikimi.gov.al/index.php?id=348>



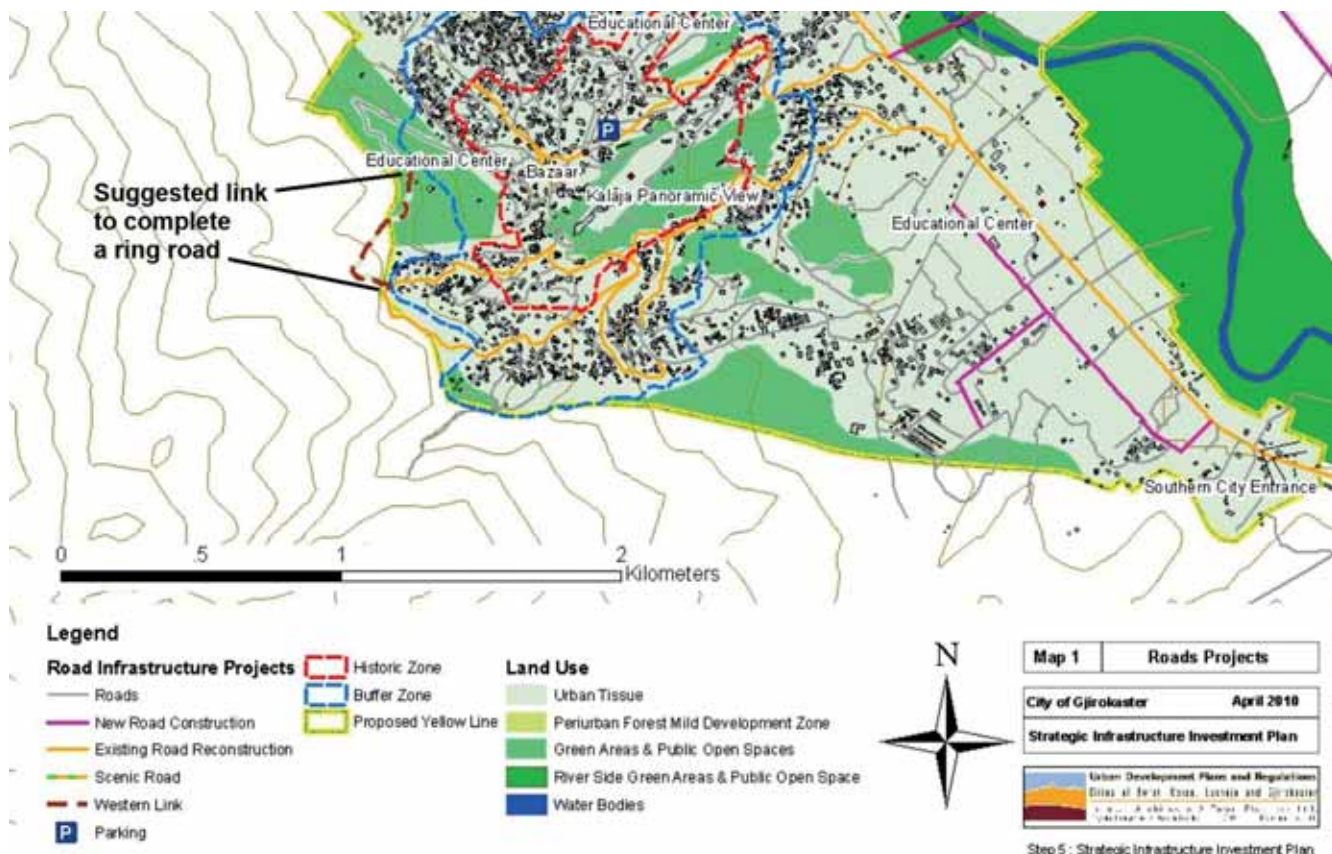


Fig. 2: The link suggested by the Strategic Infrastructure Investment Plan completely avoided the WH core and buffer zones while creating a ring road that would allow people from the Dunavat and Manalat quarters to access the modern city center without passing through the bazaar area. Map: Lerman Town Planners and Architects Ltd., May 2010

a Strategic Infrastructure Investment Plan for Gjirokastra<sup>3</sup> was submitted by the Ministry of Public Works, Transport and Telecommunications which foresaw the construction of a ring road in order to close a gap preventing traffic reaching the upper neighbourhoods of Dunavat and Manalat from the city center (see Fig. 2) but was careful not to intervene in the historic center. This plan, however, was never approved by the government or parliament, and hence, was never implemented. Since 2015, the World Heritage Committee has requested Albania to not have a bypass prior to a mobility plan<sup>4</sup>.

In 2013 a new government led by the Socialist Party under Premier Edi Rama was elected. In Gjirokastra, a socialist stronghold, Rama immediately implemented a stop of illegal private construction which threatened to destroy the town's visual integrity. At the same time, however, the local businesses, closely

linked to the now-ruling party, saw new opportunities as Rama tried to build his power base with the construction industry. In 2016 the government presented a first project of a "Bypass Road" circumventing the bazaar by a road across the steep hill of Gjirokastra's citadel. This project was in violation of national law, and, as many others before, had not been presented to UNESCO for approval under § 172 of the Operational Guidelines. It was stopped only after massive public resistance, serious concerns about its technical feasibility, and when civil society informed UNESCO.<sup>5</sup>

### Current works on the Bypass project within the World Heritage Property

Still, never were the mobility needs of Gjirokastra studied systematically nor was an attempt ever made to draft a mobility plan for the town. In the complete absence of any data justifying road plans or construction, on October 3rd, 2020, the municipality of Gjirokastra presented a new Bypass Road project financed by the Albanian Government (Fig. 3). This road will branch from the main road leading up to the historic bazaar and lead up to the upper quarters of Manalat and Dunavat through the unspoiled gorge and on top of the Zerzebili Stream

3 Lerman Town Planners and Architects Ltd.: Land Administration and Management Project (LAMP): Preparation of Urban Development Plans and Regulations for the Cities of Berat, Gjirokastra, Korca and Lushnja. Step 5: Strategic Infrastructure Investment Plan Gjirokastra, p. 32. May 2010

4 UNESCO through the decision: 39 COM 7B.75 Historic Centers of Berat and Gjirokastra (Albania) (C 569bis)/ NO. 6330, article 6 in 2015 says as above: 6. "Further requests the State Party to prepare a thorough study of the infrastructural situation of the historic center of Gjirokastra prior to any decision is taken concerning the by-pass road and the conversion of the bazaar into a pedestrian area, and provide details of the project and the results of the study to the World Heritage Centre, for review by the Advisory Bodies <http://whc.unesco.org/en/decisions/6330?fbclid=IwAR3QKLFFjTMDqOTJE-vhIUFFXDu1wBtb-XDBPVTIWsqkX-2MmPA5dJlM1LgY>

5 Kreshnik Merxhani and Bozgo V.: Heritage under pressure: The case of the Bypass in the historic town of Gjirokastra, Albania. In: World Heritage Watch Report 2017, p. 106-108. World Heritage Watch, Berlin. <http://world-heritage-watch.de/wp-content/uploads/2018/06/2017-WHW-Report-Krakow.pdf>



## QENDRA HISTORIKE E QYTETIT TË GJIROKASTRËS

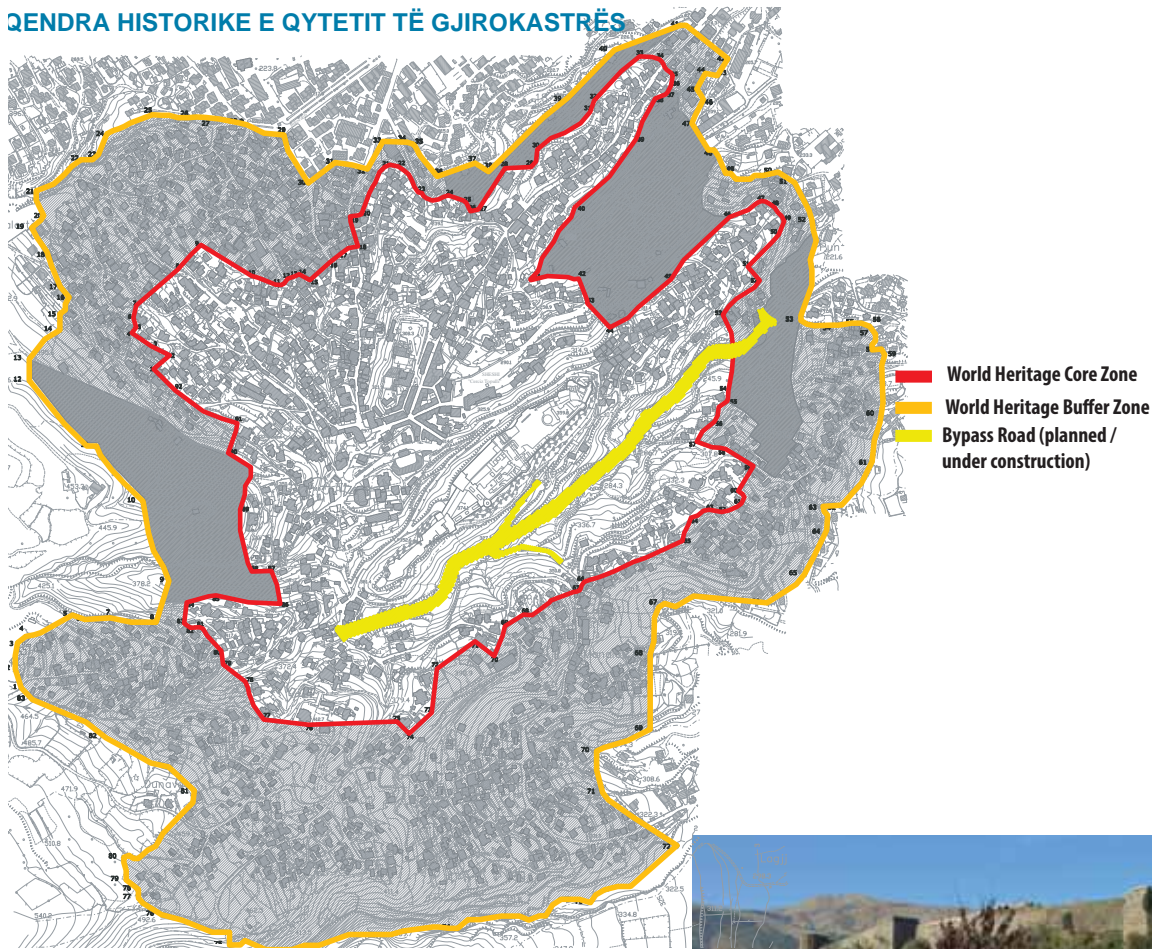


Fig. 3: The footprint of new Bypass and the UNESCO World Heritage Site boundaries. Map: Institute for Cultural Monuments, Ministry for Culture of Albania, adapted by Kreshnik Merxhani

on the southern side of the citadel, obliterating the historic character of this part of the town, destroying three bridges from the Ottoman period (1st category cultural monuments) with their related historical trails and stabilizing walls, and seriously jeopardizing the stability of several historic vernacular buildings (1st category cultural monuments) through landslides (Fig. 4–6).



Fig. 5: The gorge of the Zerzebili stream (in the foreground) is a key feature of Gjirokastrë's historical urban landscape, crowned by its iconic citadel. Photo: Stephan Doempke



Fig. 4: One of the old trails through the Zerzebili gorge connecting the neighbourhood of Cfakë with the center of town, as seen from the citadel. The traditional houses at the edge of the gorge are in danger of sliding into the gorge due to the destabilization of the slopes through the construction activities. Photo: Stephan Doempke



Fig. 6: The old trails and bridges in the Zerzebili gorge are still in use by the local people. They are often not well kept but are of extraordinary authenticity. The tranquil scenes in the gorge, uninterrupted by modern life, convey a strong sense of how life was in the old days that can hardly be found anywhere else in Gjirokastrë. Photo: Stephan Doempke



According to the announcement, construction would begin even before the end of 2020. No plans were published, no tender was held, and the people of Gjirokastra were informed only on one public meeting when no questions were permitted. Critics were quick to suspect that Prime Minister Rama was eager to present a successful project in time before the Albanian national elections in April of 2021. According to the public media and articles printed by the independent press, UNESCO had not been informed of this new bypass project, and representatives of the World Heritage Centre and ICOMOS International were taken by surprise when the case was presented to them by civil society at the end of February 2021.

At that time the construction company had already started breaking ground, and construction work was fully begun in March (Fig. 7 –9), just in time for the Prime Minister to visit the construction site together with the city's Mayor prior to the national elections<sup>6</sup>. It became clear that UNESCO was not officially (or in any other way) contacted by the appropriate Albanian government officials, again in violation of § 172 of the Operational Guidelines which requires State Parties to the World Heritage Convention not to take any decisions about projects which could have an effect on the Outstanding Universal Value of the site before UNESCO has approved it.

To add an additional layer of complexity to the Bypass project, construction has simultaneously begun on a large underground parking structure located on the north side of the citadel beneath the historic Çerçiz Topulli Square, just in front of the Municipality Building (see Fig. 1). This project also lacks any proper transportation study or circulation plan in relation to the broader needs of the city and the region. The Municipality is trying hard to backpedal and create a smoke screen of confusion by simultaneously claiming they have UNESCO approval when they do not, and behaving as if it doesn't matter, evidenced by the fact that they have already broken ground on both projects in a rush to move forward. Their assessment of UNESCO – for right or wrong - seems to be that it is better to create facts first and ask forgiveness for their actions later, testing UNESCO's resolve and betting the organization will most likely do nothing.

If the municipality should be requested to stop construction or face serious consequences pending a thorough transportation study, it is feared that a study will be conducted in haste and with the conclusions drawn to validate investment decisions already begun on these two (poorly thought out) multi-million Euro projects. It's not that the city doesn't possibly need additional circulation routes in the form of a bypass, or additional parking spaces in the form of an underground parking structure (notably in a zone prone to earthquakes).



Fig. 7: Aerial view of the start of the construction site where the Bypass Road will branch from the main road.

Photo: Kreshnik Merxhani



Fig. 8: A view into Zerzebili Gorge from the main road. The construction has already covered part of the stream.

Photo: Kreshnik Merxhani



Fig. 9: Computer rendering of the Bypass Road leading up the Zerzebili gorge – an unconscionable work of destruction.

Photo: Kreshnik Merxhani, taken from a public slide presentation of the municipality.

<sup>6</sup> <https://exit.al/en/2021/03/23/construction-of-bypass-near-gjirokastra-castle-severe-blow-to-unesco-status/>



But it is a fact that such projects are moving forward based on circumstantial evidence. Without a proper study, the municipality and the national government are essentially shooting from the hip into a very delicate, more than theoretically protected and complex area of living cultural history which warrants proper management, a proper study, and a thoughtful approach. We believe if we don't receive serious attention from UNESCO and the authoritative bodies responsible for maintaining high standards, the municipality will continue to move forward as they please along the path of least resistance, and the outcome will be an irreversible loss of the historic character of Gjirokaštër.

## Conclusions

The effects of the new Bypass Road project on the world heritage property are

1. Any new construction within the historic centre of Gjirokastra (the core zone of the WH Property) is not in line with existing regulations.
2. The Bypass Road will destroy a natural river, part of the landscape, as well as old cobble stone streets and historic bridges and walls.
3. The road will destroy archeological remains of the Old Varosh neighbourhood.
4. The road will destroy three bridges (the Zerzebili bridges), all 1st category monuments.
5. More than 15 houses (first and second category monuments) in the neighbourhoods of Cfakë and Old Bazaar (Pazar i Vjetër), are now in serious risk of destabilization and sliding downhill.
6. Studies from the 1980s to 2015 show the geological fragility of the construction zone while studies that present solutions improving the conditions of the inner road network are neglected.
7. The Bypass Road is not in line with the priorities for safeguarding the World Heritage – in Gjirokastra we have more than 400 illegal interventions, more than 100 monuments in poor state of conservation and more than 60 monuments in state of ruins.

## Recommendations

In order to prevent potential irreversibly damage to the OUV of the Historic City of Gjirokaštër, we request that

- the World Heritage Centre urges the Albanian State Party to stop immediately all activities concerning the Bypass Road, especially those which would be difficult to reverse, and to submit all planning documents for examination by the WH Committee;
- the Historic Cities of Berat and Gjirokastra WH Sites will be placed on the agenda of the 44th Session of the WH Committee as a matter of urgency;
- the WH Committee urges the Albanian State Party to invite a Reactive Monitoring Mission in order to assess the potential impacts of the Bypass Road on the spot, and to determine whether the property merits inscription in the List of World Heritage in Danger;
- the Albanian State Party, without further delay, implements all Decisions of the WH Committee and commits to full compliance with the WH Convention in order to rebuild trust.

# How to Preserve and Protect Ancient Aleppo

Louay Dakhel, Conservation Architect

This paper aims to extract the required results that achieve the preservation and protection of the ancient heritage of Aleppo, and to ensure its reconstruction and restoration in a healthy, civilized manner free from distortions. In order to reach this goal, the risks to which the ancient heritage of Aleppo is exposed today was identified in an in-depth investigation, analyzing its traditional architecture in an integrated scientific manner, and the historically repeated cases of restoration and reconstruction, by adopting the method of scientific analysis and objective comparison and referring to international conventions, especially the Venice Charter of 1964, and using realistic examples [1].

Aleppo, located in northwestern Syria (see Fig. 1), is considered one of the oldest cities in the world, with a series of civilizations since its inception seven thousand years ago until today [2], starting with the Amorites, the Hittites, Arameans, Greeks, Romans, Byzantines, and ending with the Muslims. What distinguishes this city from many ancient cities is that life has not been interrupted in it since its inception until today, so the subsoil of its land contains many accumulated layers of the effects of all these civilizations, except for the Islamic monuments. As a result, on the ground appears the problem of the integrated architectural and urban fabric of the old city, which dates back

a thousand years ago until the early twentieth century AD (with the exception of rare cases dating back to the Byzantine era when armed concrete entered the ancient city significantly).

This led to the implementation of urban and architectural plans that distorted and severed the Old City, and that distortion continued until 1983, when UNESCO intervened and held in Aleppo the "International Symposium for the Protection of Old Aleppo" [3], and the Old City was subsequently registered in the UNESCO World Heritage List in 1986 [4].

From that time on, the sporadic irregularities and the organized destruction of the old city stopped, and private and public bodies carried out a lot of restoration, rehabilitation and revitalization works of ancient buildings that were neglected, and the old city regained part of its cultural light, until the war broke out during 2011–2017. The old city was included in the UNESCO List of World Heritage Sites in Danger in

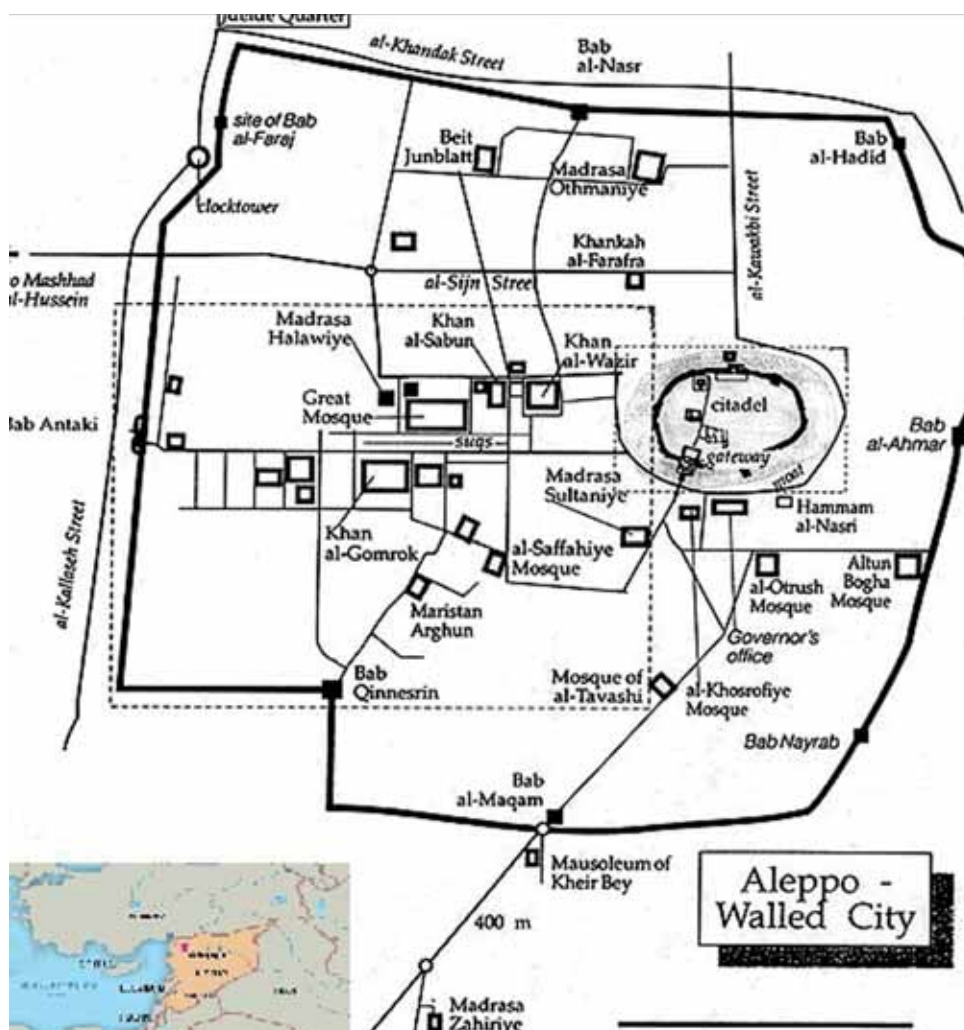


Fig. 1: The Walled City of Aleppo.

Map: [www.galenfrysinger.com](http://www.galenfrysinger.com)

2013 [4]. It became clear after the war that many monuments in the old city of Aleppo had been destroyed, and UNESCO issued its report in 2018 which shows the large proportions of destruction in the old city of Aleppo, and restoration and reconstruction work has begun in this stricken city.

### Assessment of restoration and reconstruction work in Old Aleppo after the end of the war in 2017

In general, the actors in the restoration in Aleppo after the war gave more attention to the influence of special interests than to the real effectiveness of the reconstruction in a sound and integrated civilized manner, which led to distortion and lack of protection and preservation of the architectural heritage in Old Aleppo, the most important of which are:

**1. The lack of a comprehensive scientific plan** integrating the various specializations involved, which led to the multitude of errors and lack of scientific and practical connection between the cases of restoration and the complex surrounding conditions. Attention has been focused on restoring mosques and erecting exciting squares and buildings in the media and propaganda, while neglecting the demolished homes of the majority population (see Fig. 2) and distancing themselves from the scientific logic in setting priorities.



Fig. 2: An Old Aleppo neighbourhood destroyed in the war (2011–2017).

Photo: Louay Dakhel, 2018

**2. The absence of emergency cases** of the architectural elements affected by the war. Most of them have become statically unstable, and some of them are exposed to weather factors such as winds, sun, rain, cold and heat. The damage increases day after day, so collapses happen from time to time.

**3. Restoration and reconstruction of old irregularities** dating back to the past century, restoring them today to what they were before the war with all their faults and damages, in viola-

tion of international conventions and scientific logic. For example, the Khan Chalabi House, one of the most beautiful old houses in Aleppo, was gradually transformed in the last century into commercial stores, then new shops were built in its open inner yard, then it was largely demolished during the last war, and now it is being restored as it was before the war, with all its violations and disadvantages (see Fig. 3).



Fig. 3: Khan Chalabi, one of the most beautiful ancient houses in Aleppo, was gradually turned into a commercial market in the last 100 years. Photo: Louay Dakhel, 2020

**4. The use of concrete and reinforced concrete in restoration:** This is contrary to logic, science and international standards (see Fig. 4).



Fig. 4: A historic kiosk (oriel) that was restored after the war in 2020 using concrete materials instead of wood, completely distorting the original design.

Photo: Louay Dakhel, 2020



**5. Obstacles that prevent the people from repairing.** As an example, the merchants of the old city bazaar do not lack money but rather safety, open trade routes with other areas inside and outside Syria, and an operational industrial zone in Aleppo.

**6. Repeated theft of antiquities after the war** in an organized or individual manner, and this was helped by the difficulty of protecting the huge number of antiquities (see Fig. 5).



Fig. 5: A wooden hall in the Al-Qatargasi House, one of the most beautiful ancient Aleppo houses, was stolen in 2018 after the end of the war. Photo: Louay Dakhel, 2018

The reason for all the violations of international laws, science and logic is the lack of knowledge of Aleppo's architectural and artistic heritage, in addition to the material area where the majority resort to the less expensive work.

### Necessary steps to protect ancient Aleppo, preserve its heritage, restore it and reconstruct it in a civilized manner

1. Develop a comprehensive plan for restoration and reconstruction with the participation of high-level experts from all relevant disciplines.
2. Conduct architectural and technical studies of all the elements available in the traditional architecture of old Aleppo. A live and visual section of all the elements and their different states of destruction due to the recent war will help us to do this.
3. Construction studies: In the traditional architecture of Aleppo (the city of stone) we see methodical innovations such as
  - 1 – Building stone buildings, strengthening them and reinforcing them, to make them stronger and more durable [5] while not neglecting clay (see Fig. 6).
  - 2 – The resistance of buildings to earthquakes, which is known for its frequent occurrence in the history of Aleppo through which a fault line passes. Therefore, methods of supporting stone with stone were used to increase the durability of the building (see Fig. 7), wood to give the archi-

tectural mass the flexibility of movement without collapsing (see Figure 8), iron to increase the strength of the construction in some weaknesses (see Fig. 9), and lead to increase the tenacity of stones and shock absorption (see Fig. 10).



Fig. 6: Al-Adliya Mosque. Pieces of grided clay in the ruins of the dome of the large prayer hall. Photo: Louay Dakhel, 2018



Fig. 7: Al-Qiqan Mosque from the Mamluk era, Stone nails appear in the main façade to support the stone building. Photo: Louay Dakhel, 2018



Fig. 8: Citadel Mosque. Horizontal wooden beams appear in its walls to give flexibility to the architectural mass to prevent its collapse due to earthquakes. Photo: Louay Dakhel, 2020

3 – Bonding mortar for stone pieces which consists of the same natural composition of the stone that composes the building, which makes the group of stones adjacent to this mortar become very coherent and durable as if it were a single strong block, as it was in the natural mountain originally, one piece.



Fig. 9: Al-Firdaws School from the Ayyubid era. Iron frames support the columns at weak points in order to prevent collapse due to earthquakes. Photo: Louay Dakhel, 2020



Fig. 10: The entrance to the Citadel. Lead is used as an adhesive and to increase the flexibility of the architectural elements in important stone buildings. Photo: Louay Dakhel, 2020

From 1, 2 and 3 above, we make sure that there are no additions to the structural and architectural code of the Syndicate of Engineers in Aleppo to match the stone building.

4. Benefit from the complete destruction of some buildings to excavate their land for antiquities (see Fig. 11).
5. Restoration studies for each case separately: due to the richness of the archaeological formations and the multiplicity of their cases. And rehabilitating and employing all the ancient buildings, and not leaving any of them deserted to avoid the erosion of the building, as for example the Persian Kitchen.
6. Document all antiquities using the latest methods [6] such as Photography, so that this documentation will help to accomplish restoration work today and as a scientific ref-



Fig. 11: A stone dating back to the Byzantine era was found under the rubble during the restoration of the wall of the Citadel after its destruction in the war (2011-2017). Photo: Louay Dakhel, 2020

erence to help detect theft in the future and to revive the intangible heritage that supports the tangible and related heritage.

7. Introduce the heritage of ancient Aleppo into educational curricula at all levels, establish an institute for graduate professionals specialized in traditional building styles, and oblige those who work in restoration today to master what must be mastered in order to implement a successful restoration.

## Conclusion

The protection, preservation, restoration and reconstruction of ancient Aleppo in a civilized and sound manner can only be achieved with the concerted scientific and practical efforts of a large and complex, and if we do not do so, then the heritage of Aleppo is subject to distortion and danger.

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Fig. 12: The Citadel of Old Aleppo after its first restoration. Photo: Louay Dakhel, 2005



# Old Aleppo and the Challenge of Reconstruction and Restoration

Anonymous<sup>1</sup>

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Following the end of severe armed conflicts inside the Old City of Aleppo in December 2016, it was evident that there was an urgent need to conduct an independent assessment of the damage, draft an action plan as well as a global reconstruction strategy, invent solutions to prevent further damage or the collapse of buildings. As the Syrian authorities failed to deliver a rapid action plan to respond to the damage of the old city, the cracked buildings continued to collapse, imposing a threat to the lives and safety of the civilians living in the area.

The Syria Trust for Development (STD), headed by the wife of the Syrian President, got involved, took the principal leading role for the reconstruction of the Old City of Aleppo and made decisive decisions about the rehabilitations. This STD cooperates with the Aga Khan Trust for Development, who invests funds for Islamic architecture and development in the Islamic world. This organization has a local director in Syria, and at the same time plays the role of partner and consultant in the reconstruction works.

Also in Syria, the United Nations Development Program (UNDP) gives funding for the reconstruction and restoration works in coordination with these two organizations who decide mainly and practically to whom to give contracts, or to which local construction offices.

The main problem in Aleppo is the absence of a clear vision and global strategy for the reconstruction works. Plus, the Directorate of Antiquities (DGAM) has no word to say in the reconstruction projects, and the same is true for the local civil society. The lack of coordination of with UNESCO is a big problem, which was reflected in the reports of the 2018 World Heritage Committee meeting in Manama. The UNESCO delegation which was sent to Damascus just after this meeting didn't reach an agreement with the Syrian authorities.

The reconstruction works of certain *suqs* such as *Suq Al-Saqatiyya* received a lot of criticism from local experts during meetings well as in the social media. The fact that the "restoration" project did pay attention to the internal structure of this *suq* was considered by certain local authorities as a "scandal". Also, the way of cutting stone received criticism in a city which is famous for its stone constructions. However, the big surprise was when this *suq* was the winner of the ICCROM-ATHAR<sup>2</sup>, located in Sharja, after all that had been written and said about this restoration.

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1 The author is known to WHW and can be contacted through us.

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2 ICCROM-ATHAR (Architectural and Archaeological Tangible Heritage in the Arab Region) is a regional conservation centre founded by ICCROM and the Government of the United Arab Emirates.



# Nea Church in Old City in Jerusalem: A Chance to Emphasize the City's Multi-faceted Heritage?

Chemi Shiff, Emek Shaveh



This paper will present the point of view of Emek Shaveh regarding the conservation of the Nea church in the Jewish quarter in Jerusalem. Emek Shaveh is an Israeli organization dedicated to the safeguarding of Jerusalem's multi-faceted cultural heritage. The organization's activities focus on raising awareness to the importance members of all faiths and denominations attribute to the city. The case study of the Nea church demonstrates how the Israeli government prioritizes Jewish heritage sites over non-Jewish ones, leading to the neglect and misrepresentation of the latter.

## Background

The "Old City of Jerusalem and its Walls" was nominated by the Hashemite Kingdom of Jordan as a World Heritage site in 1981 due to its importance as the cradle of the three main monotheistic religions (in accordance with criteria ii, iii, and vi). Its nomination by Jordan is unique in that the country was allowed to nominate the site despite the fact that it no longer had any jurisdiction over it since it was occupied by Israel in 1967.

In its nomination, proof of its stature as "the cradle of monotheism" was provided by a list including 220 sites illuminating the city's importance for these religions.<sup>1</sup> However, as soon as 1982 the city was inscribed to the list of World Heritage Sites in Danger due to the intense processes of urbanization in the city and the destruction of its religious sites that compromised its authentic integrity.<sup>2</sup>

Ever since, the city has served as a constant source of tension between Israel and UNESCO. First, while Israel considers the Old City as part of its sovereign territory, UNESCO – together with most of the international community – regards it as occupied territory. Therefore, it has repeatedly objected to what

it deems as unnecessary excavations according to international law.<sup>3</sup>

Second, Israel has refused to comply with an action plan drafted by UNESCO for the safeguarding of Jerusalem's multi-faceted heritage.<sup>4</sup> Israel was also criticized by Jordan and Palestine for what they defined as its neglect of Muslim and Christian cultural heritage sites.<sup>5</sup>

Third, Israel protested resolutions made by the World Heritage Committee and the UNESCO Executive Board which omitted or downplayed the historic ties linking Jews to Jerusalem and especially the Temple Mount / Haram a-Sharif, leading to Israel's withdrawal from UNESCO as a state party in 2019.<sup>6</sup>

## Historical Background

The Nea Church (The New Church of the Theotokos) was built during the 6th century C.E by the Byzantine emperor Justinian I. Its construction served as the apex of several construction projects in what is recognized as one of Jerusalem's golden ages. The church was built in the southern area of the Old City, between today's Jewish quarter and Mt. Zion (see Fig. 1). At the time it was built it was one of the most monumental churches in the Christian world. It spanned an area of 115x57 meters. A quarter of the building was built on an artificial lot. Researchers note several reasons that led Justinian I to order the construction of the Nea church.

First, it is believed that he intended to reconstruct – or even surpass – the grandeur and splendor of the Second Temple –

1 Nomination of the "Old City of Jerusalem and its Walls" for Inscription on the World Heritage List. Convention concerning the Protection of the World Cultural and Natural Heritage, World Heritage Committee, First Extraordinary Session, Paris, 10 and 11 September 1981: Annex III.2.

2 Nomination of "the Old City of Jerusalem and its Walls" to the list of world heritage in danger. Convention concerning the Protection of the world cultural and natural heritage. World Heritage Committee, Sixth Session, 13-17 December, 1982: 10-12.

3 As stipulated in the Hague Convention for the Protection of Cultural Rights in the Event of Armed Conflict (1954) and the Convention on the Protection of the World Cultural and Natural Heritage of 1972.

4 UNESCO (N.D), Action Plan for the Safeguarding of the Cultural Heritage of Jerusalem, p.2. Retrieved January 17, 2021.

5 As can be observed in the State of Conservation Reports filed by Jordan and Palestine.

6 WHC decision report (2016). 40 COM 7A.13; Executive Board 200th Session (2016), Occupied Palestine Draft Decision, 12 October 2016. Document code: 200 EX/PX/DR.25.2.

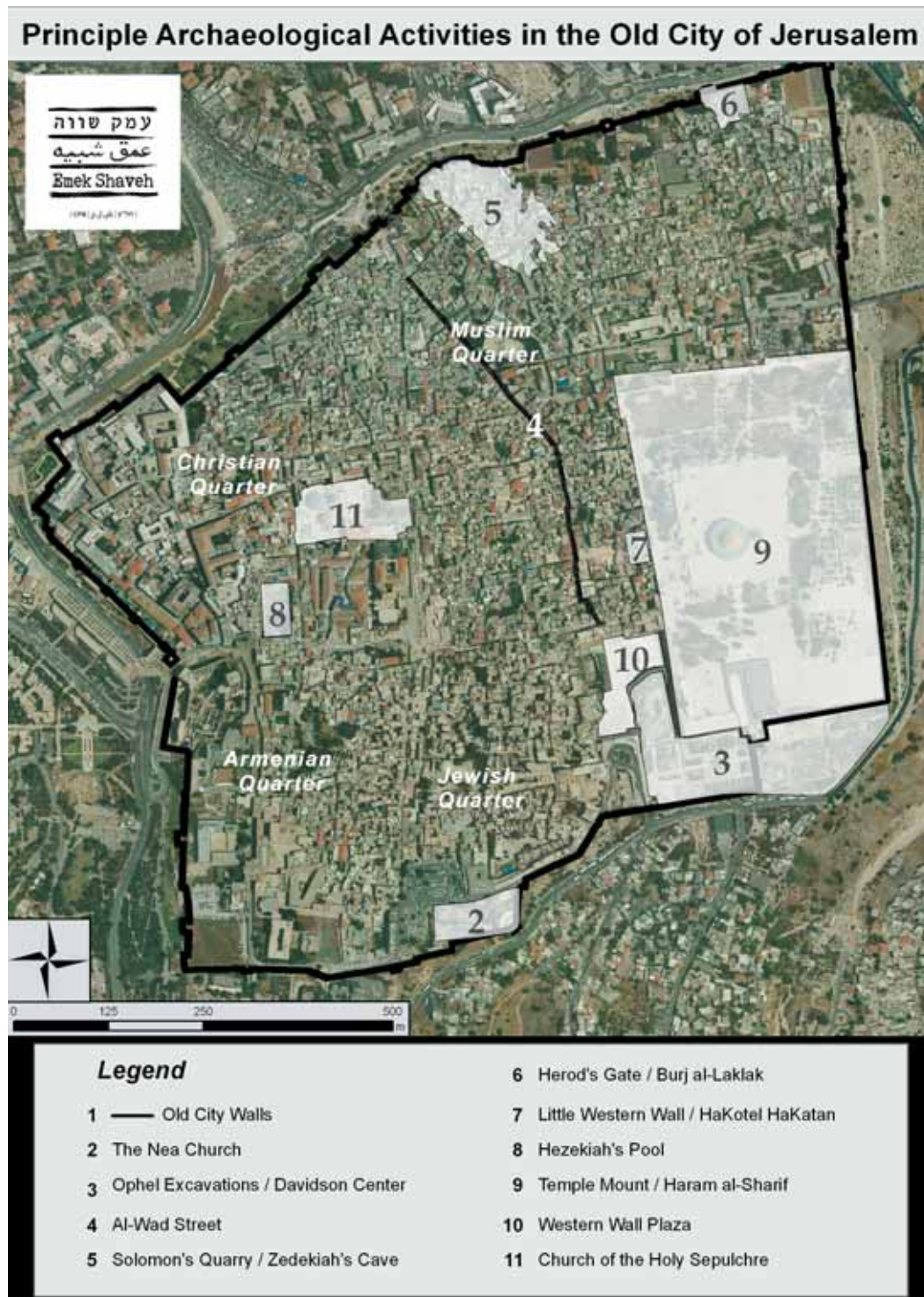


Fig. 1: Location of the Nea church.

Map: Emek Shaveh

thus proving the superiority of Christianity over Judaism.<sup>7</sup> In this vein, there are those who have suggested that after the church was constructed he ordered the treasures looted from the Second Temple to be brought to the church.<sup>8</sup>

Second, the decision of Justinian I to call it the Church of Theotokos (In Latin: Mother of God), reflects his position in the theological controversy over Mary Mother of Jesus, and if she indeed gave birth to a son of flesh and blood who became a God or whether she gave birth to a God, directly from the womb.<sup>9</sup>

The Nea church continued to be in use until the Umayyad period (7th–8th century C.E) or even the Abbasid period (8th–9th

<sup>7</sup> Gutfeld, O. 2012 Discussion and Summary, In Gutfeld, O (ed) Jewish Quarter Excavations in the Old City of Jerusalem Conducted by Nahman Avigad, 1969–1982. Vol V: The Cardo (Area X) and the Nea Church (Areas D and T), Final Report. Jerusalem: Israel Exploration Society and Institute of Archaeology, Hebrew University of Jerusalem, pp. 491–493.

<sup>8</sup> Ibid: 494.

<sup>9</sup> Cameron, A. 1978. The Theotokos in Sixth-Century Constantinople: A City finds its Symbol. *The Journal of Theological Studies* 29 (1): 79–108.



century C.E), at which time it was abandoned. Over the years it was built over and its exact location was forgotten. Due to the Old City's dense urban fabric, it was not possible to conduct any excavations in the Old City, and various speculations were made regarding the exact location of the church. However, after the Israeli occupation of the city in 1967 and in the aftermath of the vast devastation of the Jewish quarter, it was decided to conduct excavations throughout the city before reconstructing the Jewish quarter. In these excavations, which took place between 1969-1981, many important remains illuminating the city's multi-faceted heritage were uncovered, among them the Nea church.<sup>10</sup>

### Conservation of the site

Despite the symbolic and religious importance of the Nea church, the site underwent only minimal conservation. Most of the church is submerged under a playground, a parking lot and part of the Jewish quarter. The underground section of the church includes a large, vaulted hallway. Walking through these remains one can glimpse the monumental dimensions of the church, and by extension the grandeur and importance of Jerusalem in the Byzantine period.

Despite their importance, these remains have suffered from extreme neglect: It has undergone only minimal conservation (see Fig. 2) and it is locked and therefore inaccessible to visi-



Fig. 2: The neglect of the Nea church.

Photo: Emek Shaveh

tors (Fig. 3). However, the Company for the Restoration and Development of the Jewish Quarter in Jerusalem (CRDJQ) – the governmental company responsible for the management of the Jewish quarter, and among other sites the Nea church – claims that anyone who wishes to visit the site may receive a key and enter the site upon request. Moreover, garbage that has been



Fig. 3: Locked entrance to the underground vaults of the Nea church.

Photo: Emek Shaveh

thrown into the underground vaults over the years has made the site extremely inhospitable for visitors (Fig. 4).



Fig. 4: Garbage in the Nea church.

Photo: Emek Shaveh

Over the years, demands have been made to open the site, in similarity to other major heritage sites in Jerusalem. Since 2015 the Jordanian Permanent Delegation to UNESCO warned that the neglect of the Nea church and the construction of a park-

<sup>10</sup> Gutfeld, O. 2012 Discussion and Summary, In Gutfeld, O (ed) Jewish Quarter Excavations in the Old City of Jerusalem Conducted by Nahman Avigad, 1969-1982. Vol V: The Cardo (Area X) and the Nea Church (Areas D and T), Final Report. Jerusalem: Israel Exploration Society and Institute of Archaeology, Hebrew University of Jerusalem, pp. 495.



ing lot and a playground above the church will lead to the erasure of this aspect of Jerusalem's multi-cultural heritage.<sup>11</sup>

In 2019 Emek Shaveh demanded that the CRDJQ open the underground areas of the church to the public. In response, the CRDJQ replied that in recent years it has made many efforts to maintain the church. They removed 25 tons of garbage that accumulated in the church<sup>12</sup> and consulted with conservation experts to assess the work that will be needed to allow the opening of the site for the public. However, they came to the conclusion that they currently do not have the necessary funds needed to allow tourists to enter the site safely.<sup>13</sup>

At the same time, considerable funds have been invested in the conservation of sites located in proximity to the Nea church which illuminate Jerusalem's Jewish heritage.<sup>14</sup> Thus, while funds have been found to preserve Jewish cultural heritage sites, almost no funds were allocated for the conservation of the Nea church.

11 Hashemite Kingdom of Jordan and the State of Palestine, 2015. Status Report on the State of the Conservation of the Old City of Jerusalem and its Walls: 29; Hashemite Kingdom of Jordan and the State of Palestine, 2016. Status Report on the State of the Conservation of the Old City of Jerusalem and its Walls: 49; Hashemite Kingdom of Jordan and the State of Palestine, 2020. Status Report on the State of the Conservation of the Old City of Jerusalem and its Walls: 82.

12 Horodnichano, M. 2019. Will One of the Most Important Churches in Jerusalem be opened to the public after decades it was Closed? WallaNews. (Hebrew)

13 Emek Shaveh, 2019. "Emek Shaveh" Requests the Company for the Reconstruction and Development of the Jewish Quarter to Consider Opening the Nea Church to the Public. Emek Shaveh website.

14 State of Israel, 2014. Monitoring According to Paragraph 169 of the Operational Guidelines: Old City of Jerusalem and its Walls (148). Nominated 1981; State of Israel, 2016. Monitoring According to Paragraph 169 of the Operational Guidelines: Old City of Jerusalem and its Walls (148). Nominated 1981.

## Recommendations

The case study of the Nea church is but one example of important heritage sites that have been neglected since 1967 because they do not reflect the city's Jewish heritage. Therefore, we call upon UNESCO to take the following steps:

1. Utilize the fact that contrary to sites such as the Temple Mount / Haram a-Sharif, the conservation of the Nea church doesn't have any political implications to formulate new intervention policies for the safeguarding of Jerusalem's multi-faceted heritage and the creation of feasible criteria for the removal of the "Old City of Jerusalem and its Walls" from the list of World Heritage Sites in Danger.
2. Reach out to the Israeli government and request they allocate funds which are to be used exclusively for the conservation of the Nea church and other non-Jewish heritage sites in the Old City.
3. Demand that the Israeli government implement prior conservation plans to which it has committed for the conservation of Jerusalem's multi-faceted heritage such as the UNESCO action plan for the safeguarding of Jerusalem's multi-faceted heritage.

# Historic Cairo: A Diminishing Historic Urban Landscape

Anonymous<sup>1</sup>

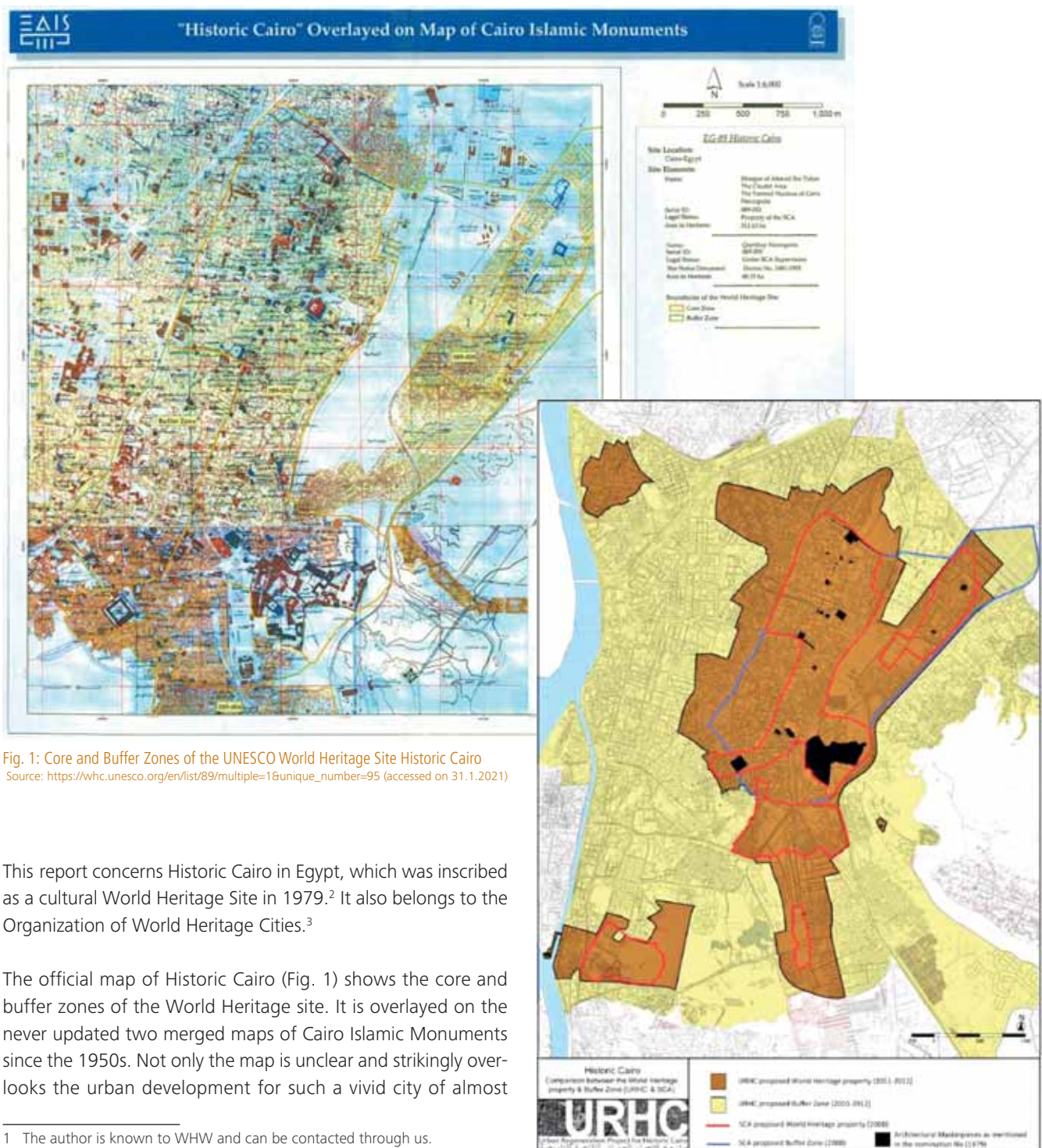


Fig. 2: Core and Buffer compared to those suggested by the URHC-Project  
Source: <http://www.urhcproject.org/> (accessed on 31.01.2021)

21 million inhabitants<sup>4</sup> for over fifty years, but also so do the national plans and projects for the very same Historic Cairo in recent months.

Historic Cairo is one of the oldest living Islamic cities in the world. It embraces a rich urban landscape with various interwoven economic and social activities that have survived through centuries. The existing monuments date back to the seventh century in Fustat, the first capital. The later Fatimid, Ayybid, Mamluk and Ottoman extensions of the city form with Fustat what is called now Historic Cairo. The historic urban tissue, including historic cemeteries, is still existing in most of the historic parts of the city, and the traces of the vanished lakes and canals tell a tale of integrity and adaptability.

However, this living city with its components has ever suffered from accessibility issues that has led to cutting wider roads and demolishing parts of its medieval tissue since the 19th century. Such urban development projects which compromise parts of historic cities were accepted back in time. However, in 2021, the concerned national and international communities should condemn such projects without careful impact assessment studies or creating alternatives. Currently, the situation in Historic Cairo is alarming and needs to be addressed on the national and international levels; several urban development projects that affect not only the historic monuments but also the life of people are being implemented in Historic Cairo's core zone without prior national and local discussions. This report is to highlight the major concerns and starts with a project that should have played a major role in preventing irresponsible consequences.

### The Urban Regeneration for Historic Cairo Project: an official insularity

The UNESCO World Heritage Centre initiated the Urban Regeneration for Historic Cairo (URHC) Project in 2010, which was thought to be integrated into the national strategies in conserving Historic Cairo's layered heritage attributes and rich historic landscape. It was dedicated to the "safeguarding of this cultural heritage and aiming at defining a more appropriate and efficient management system of the site"<sup>5</sup>.

Several studies were conducted and published from 2011 to 2014,<sup>6</sup> including a "Study on the Violations, Environmental Risks Facing Historical Cairo", Rehabilitation of Historic Cairo: Socio-economic survey, Community-oriented Activity Patterns, Housing rehabilitation study, Historic cemeteries component of the urban regeneration project for Historic Cairo, and citadel neighbourhoods reintegration project, a research-based urban

design proposal for the Sayeda Aisha market area. The latter in particular concerned a site in Historic Cairo that is planned to be completely removed.

Although a surveyors team was trained by the URHC Project according to its Violations Study Report in 2014, these trained surveyors never formed a team to create a *technical body* as recommended by the report.

In conclusion, this project, despite its thorough investigations of different aspects of the nature of Historic Cairo, skipped the investigation of accessibility and transportation complications within the inscribed area and its connection to the Greater Cairo. The (in)accessibility and transportation of Cairo has for decades been a major challenge that should never be overlooked in a realistic and sustainable management plan for a city of such a condensed nature. As shown in the maps of Cairo, the historic parts of Cairo are by nature central and have combined different commercial and economic activities for centuries. This official overlook of the accessibility and transportation challenges in Cairo has resulted in the gradual damage of the urban tissue of the city, especially in its historic parts.

This project and its studies and reports were not integrated into the national long-term development agenda. Transportation is now a major concern at the national level for Cairo to connect it with the *New Administrative Capital*.

### The New Administrative Capital vs. the Historic Cairo: the Axis of Civilisations

The urban challenges of historic Cairo, as explained, cannot be isolated from the larger present urban context of Egypt's capital. The New Administrative Capital is some fifty kilometres away from Cairo to the east. All present administrative buildings are being prepared to be evacuated, and all national administrative services and headquarters will be relocated in the New Administrative Capital.



Fig. 3: Historic Cairo and the New Administrative Capital. Map: Google Earth / author

There are no maps officially shared which show the planned new roads and bridges. Concerned individuals and organisa-

4 <https://www.macrotrands.net/cities/22812/cairo/population#:~:text=The%20metro%20area%20population%20of,a%202.18%25%20increase%20from%202017>. (accessed on 31.01.2021)

5 <https://whc.unesco.org/en/news/914/> (accessed on 31.01.2021)

6 <http://www.urhcproject.org/Studies> (accessed on 31.01.2021)



tions have to collect and link scattered information to visualise the national urban plans in relation to the new capital and the Historic Cairo. In July 2020, the destruction started in the Eastern Cemetery (inside the core zone of the World Heritage Property). Now, parts of al-Hattaba, Arab Al Yasaar, and the cemeteries are being demolished although all these areas belong to the core zone of Historic Cairo. In particular, the cemetery areas in al-Ghafir, al-Saida Eisha (Fig. 4, 5), al-Siuty, and al-Basatien (some of which are 2,760 tombs as officially announced<sup>7</sup>) are histor-



Fig. 4 and 5: Cairo Historic Cemeteries in al-Sayeda Aisha.

Photos: Yann Arthus-Bertrand, 1993



ically intertwined with historic buildings, and the whole area dates back to the Mamluk period (1250–1517 AD). These areas suffer from major negligence as shown in photos (Fig. 6, 7). They deserve careful intervention for rehabilitation and renovation, and not complete demolition.

The fast and formidable demolitions and the accompanying construction of bridges and highways in such critical areas in the heart of Historic Cairo not only tear up the urban nature of the city but also could destroy the archaeological remains that are possibly hidden underneath this fragile endangered parts.

<sup>7</sup> <https://www.elwatannews.com/news/details/5265822> (accessed on 31.01.2021)



Fig. 6: Derelict house in the Arab al-Yasaar area.

Photo: Doaa Adel



Fig. 7: Derelict house in the Arab al-Yasaar area.

Photo: Michel Hanna

It is worth mentioning that the document “Boundaries and Conditions for Historic Cairo” was issued by the National Organisation for Urban Harmony, and approved by the Egyptian Supreme Council for Urban Planning and Development in 2011 according to the Law 119/2008.<sup>8</sup> This official document states in Article 2, page 3, that “it is forbidden to erect any constructions in public and open spaces or the streets and squares, such as building façades, pedestrian bridges, vehicular upper roads, advertisements and signboards, which could block the visual axes, streets and squares.”



Fig. 8: A destroyed tomb in the al-Ghafier cemetery. Photo: Youssef Osama, 2020

### The Informal Settlements Development Fund (ISDF)

What is furthermore threatening is the current official vision of the areas that are fated to be demolished. The Informal Settlements Development Fund (ISDF),<sup>9</sup> although not qualified to deal with a historic city, is now responsible within the Cairo Governorate for the demolitions. However, other authorities that usually take part in decision-making in such national projects, such as the National Organisation for Urban Harmony (NOUH) and the Ministry of Tourism and Antiquities, play almost no role in the ongoing destruction process.

### Conclusion

The destruction of Historic Cairo under the pretext of development calls for the solidarity of all specialists and those keen on heritage and Historic Urban Landscapes. The demolition works and construction of bridges that allow more traffic in the heart of Historic Cairo break national and international law and should be stopped immediately. The World Heritage Centre, ICOMOS, and national civil societies should be first officially informed and consulted for any development projects in this World Heritage property, especially the locations of the new bridges and highways and their possible impact on the existing monuments and the Historic Urban Landscape.

A condition report should be prepared for the areas in the core zone already demolished and/or announced for demolitions. A reduction of vehicular accessibility within the areas of the core zone (such as al-Sayeda Aisha, al-Basatien, al-Suity and Arab Al Yasaar) is necessary, and the upgrading of the urban infrastructure should be a priority instead. The urban development should never harm the social and economic networks and the Historic Urban Landscape of Historic Cairo, the capital of Egypt for over a millennium.

<sup>8</sup> [http://urbanharmony.org/download/pdf/islamic\\_cairo\\_boundries2020.pdf](http://urbanharmony.org/download/pdf/islamic_cairo_boundries2020.pdf) (accessed 31.01.2021)

<sup>9</sup> <https://www.shorouknews.com/news/view.aspx?cdate=16122020&id=-9491f68a-4bf6-49c2-8466-1d60f5658688> (accessed on 31.01.2021)  
<https://www.elbalad.news/4625363> (accessed on 31.01.2021)



# Lamu Old Town is at a Critical Point of Losing its Outstanding Value and Heritage Status

Mohamed Athman, Save Lamu



The Old Town of Lamu is known as the “the island of cultural festivals” and stands in a unique archipelago along the Indian Ocean. The Old Town is under threat of collapsing and losing its great glory of World Heritage status for its cultural heritage<sup>1</sup>, as recognized in 2001 by UNESCO. Among the threats are the impacts of the LAPSET (Lamu Port South Sudan Ethiopia Transportation)<sup>2</sup> Corridor Project, such as rapid population increase, overstretching of natural resource use, unsustainable use of already-scarce water sources<sup>3</sup>, and degradation of natural marine habitat such as mangroves and coral reefs<sup>4</sup>. These developments have profoundly affected both the tangible and intangible aspects of Lamu’s heritage<sup>5</sup>.

Other problems on the rise are poor Old Town management of sewage, historical traditional buildings, debris on the streets, a significant increase of number of vehicles and motorcycles (Fig. 1), and the mushrooming of mini shops stationed along the streets<sup>6</sup>. The Lamu municipality, under County Government, is weak in manpower, policies, and resources to manage the situation<sup>7</sup>.



Fig. 1: Motorbike operating along the old town beachfront.

Photo: Save Lamu

All these concerns add up to extensive challenges facing the property that cumulatively and, in some cases, individually have the potential to impact adversely on the integrity and authenticity of the property and thus on its OUV to a degree that could put the Lamu old town heritage in danger, as stated in the Lamu Old Town reactive mission report of 2019<sup>8</sup>.

We agree and affirm the views of the report which further states, “If the state of conservation of [Lamu old town] is not addressed urgently, [this] will mandate a recommendation for the inclusion of the property on the List of World Heritage in Danger due to both Ascertained and Potential Danger. It is the opinion of the mission that the decayed physical state of conservation of the property alone could lead to consideration of danger listing, but when coupled with the potential impacts of the LAPSET project, the Lamu Coal Power Plant project (if it were to restart), and other management failures, the possibility of danger listing becomes even stronger.”<sup>9</sup>

The Lamu Old Town is valued by the local people as a source of pride due to its Outstanding Universal Value (OUV) in architecture and urban structure of Lamu Swahili building technology and its traditional and cultural identities.<sup>10</sup>

This outstanding heritage has a very sentimental value for the people of Lamu, and it is influencing the socioeconomic sphere of the county, particularly in fishery, tourism and trade activities. Locals’ livelihoods here are mainly based on modern tourism and traditional fisheries, employing around 75% of the workforce in Lamu County (Fig. 2). Annual religious and cultural festivals have been key drivers to economic enhancement in the region: a contributor and a keystone of socioeconomic sustainability and successes for generations. The two main festivals attract people around the world to come and visit Lamu. The majority come to learn, pay their respect to the old town, and also to enjoy the tranquility and beauty of the marine and terrestrial environment.



Fig. 2: The historic Lamu waterfront. Traditional fishing boats are one of its important and characteristic features.

Photo: Abdalla Bhargash



But the Lamu Old Town is no longer the same, as its outstanding heritage is now at a critical point due to its continuous local economic decline and weak heritage institutions and management policies in place. If this trend cannot be halted and reversed soon, no resident will remain who would take a serious interest in maintaining and re-inhabiting the town, and it will become a ghost town, after many centuries of continuous cultural life. After our community's various efforts to present our concerns to UNESCO, finally a UNESCO mission visited Lamu in 2019 to assess the situation of Lamu Old Town. This has been their first mission to visit Lamu since 2011 due to security risk assessments.

In their joint World Heritage Centre ICOMOS/ICCROM Reactive Monitoring Mission report, dated December 2019, UNESCO has expressed itself and made statements on concern over the likely negative impacts of the Lamu Port – South Sudan – Ethiopia Transport (LAPSSET) corridor development project and coal power generation plant on the Outstanding Universal Value (OUV) of the Lamu Old Town World Heritage property, which was inscribed in 20<sup>11</sup>. The report called for the Kenyan government to implement the NET judgment and thus conduct a fresh Environmental Impact Assessment for the proposed coal plant.

Since 2015 in Lamu, the LAPSSET project has proceeded quickly. Now Lamu Port is reaching the completion of construction on the first three berths, out of 32 total planned. The government plans to launch the project on 15 June 2021 (Fig. 3).



Fig. 3: Latest Development of Lamu Port, part of the LAPSSET project in Lamu County. The first berth has now been completed. Photo: i.imgur.com/CPKwmzN.jpg

In April 2018, Kenya's High Court determined that there were rampant violations in the environmental planning and management of the project, and awarded a compensation to 4,700 fishermen in Lamu. To date, the ruling has not been implemented or enforced. For three years, the fishermen's compensation has been delayed, while the other components of the ruling were suspended pending an appeal that has not been heard in court. Port construction continued without disruption or alteration.

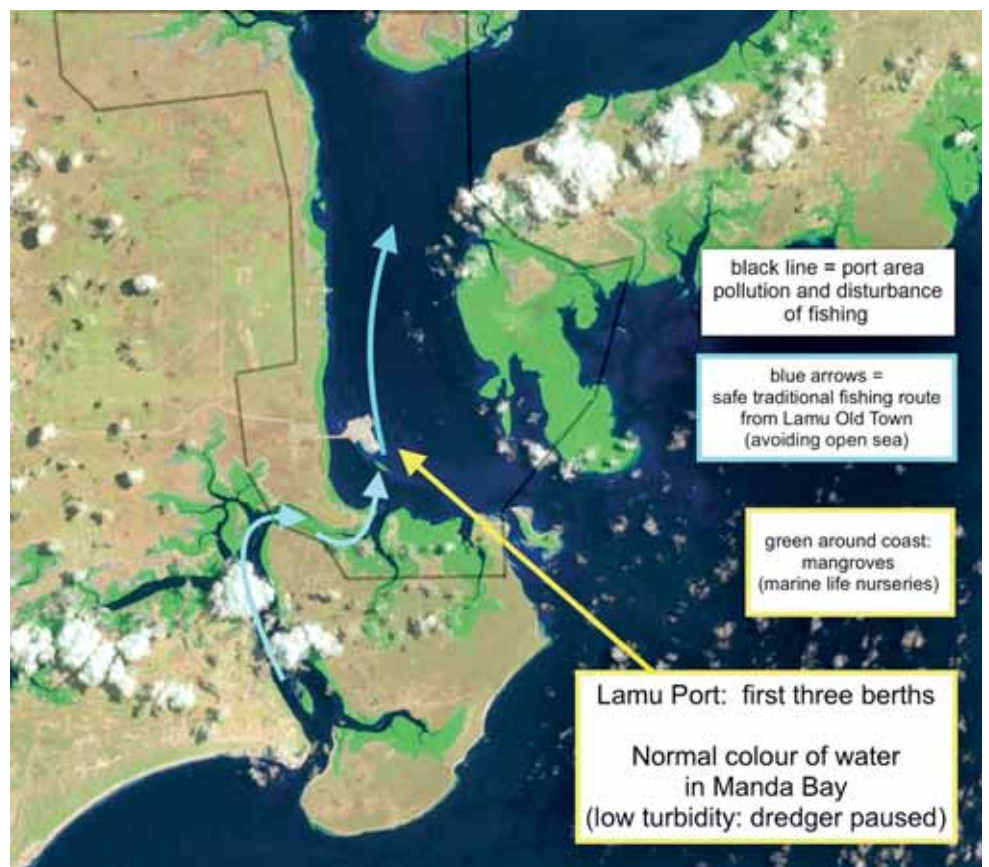


Fig. 3: The traditional route of Lamu fishermen is mostly within the Lamu Port area and will be disturbed by turbidities from dredging in order to create deep channels for big ships. Fishing will also decline through pollution and disturbance from the port operation.

Photo: Google Earth / Save Lamu

In its July 2019 decision, the UNESCO World Heritage Committee further requested that the Kenyan government submit all requested impact assessments “before proceeding with the Lamu Coal Project.”

This new mission report picks up from there and goes even further: “With regard to the planned Lamu Coal Power Station project, the mission concludes that the concerns regarding the proposed coal-fired power plant aired in previous World Heritage Committee decisions remain both valid and urgent, despite the project being temporarily halted.”<sup>12</sup>

The Lamu coal plant project remains in planning. The Kenyan government has repeatedly reiterated its intention to build the coal plant, and the project continues to be listed in government budget and energy planning documents. Although the project’s environmental licence was revoked in litigation, the developers appealed the decision, and the appeal has been pending for nearly two years. There is some indication that the main financier of the project, the Industrial and Commercial Bank of China, has withdrawn its investment, but the bank has not confirmed this publicly, and these possible developments do not preclude alternative funding sources.



Fig. 5: Lamu communities fighting for natural heritage justice.

Photo: Save Lamu

### In 2021, Save Lamu requests the World Heritage Committee to:

1. Add Lamu Old Town to the List of World Heritage in Danger until the LAPSET and Lamu coal plant projects are suspended pending completion of a legally valid, revised LAPSET Strategic Environmental Assessment, a Heritage Impact Assessment, and a legally valid Environmental Impact Assessment of the Lamu Coal Project that considers the impacts on the OUV of Lamu Old Town, as per WHC 43 COM7B. 107.8. These documents have been requested by the Committee for at least six years.
2. Ensure all efforts are made to ensure that World Heritage properties are not harmed by development projects, taking the precautionary principle fully into account.
3. Ensure that all relevant development initiatives include the sustainable development of the socio-economic environment of World Heritage properties in their programs.
4. Advise the State Party to safeguard Lamu Old Town as a World Heritage property by inclusion of its socio-cultural and economic heritage context, and to set a permanent financial entity on public budgets for this purpose. This will raise the funding required for conservation and guarantee the continuing protection of the site.

### Conclusion

Save Lamu is requesting the UNESCO Committee to advise the State Party to take serious cognizance of the extent of the challenges it faces in maintaining the integrity and authenticity of the OUV of the Lamu Old Town World Heritage property.

- 1 Draft Lamu Old Town, World Heritage Management Plan (2013-2020). Lamu
- 2 Atkins-Acuity (2017). LAPSET, Corridor Investment Framework. Nairobi
- 3 LAPSET Corridor Development Authority (2017). LAPSET Corridor Program - Status. Nairobi.
- 4 UNESCO (2005). Water and Sanitation Assessment Mission to Lamu, 12-22 February 2004. Paris Repcon Associates (2017). Draft SEA for the LAPSET Infrastructure Corridor, Vol 1. Nairobi
- 5 UNESCO World Heritage Centre and ICOMOS (2004). Mission to Lamu Old Town, 22-17 March 2004. Paris
- 6 Lamu County (2018). Lamu County Integrated Development Plan 2018-2022. Lamu
- 7 Usam Ghidam (1976). Lamu, a study in Conservation. Nairobi
- 8 ICOMOS and ICCROM (2019). Reactive Monitoring Mission Report, 19 November 2019
- 9 *ibid.*
- 10 <https://whc.unesco.org/en/list/1055>
- 11 *ibid.*





### III. Cultural Landscapes and Mixed Properties

# Hope that Some of the Threats to the Kujataa UNESCO World Heritage Site Could Subside

Niels Henrik Hooge, Friends of the Earth Denmark's Uranium Group



With the outcomes of the recent general and municipality elections, a new course might be plotted for environmental protection in Greenland that ultimately could have a positive impact on the Kujataa UNESCO World Heritage Site (WHS) in Southern Greenland. On April 16<sup>th</sup>, Muté B. Egede, Greenland's new prime minister from the centre/left Inuit Ataqatigiit and Hans Enoksen from the nationalist Partii Naleraq announced that the two parties had formed a new government coalition. On the to-do list in the coalition agreement<sup>1</sup> is among other things shutdown of the Kvanefjeld uranium and rare earth elements (REE) mining project and adoption of new anti-uranium legislation. The latter is expected to have an impact on other uranium mining projects in Southern Greenland.



Fig. 1: Kujataa Greenland: Norse and Inuit Farming at the Edge of the Ice Cap.

Photo: Kommune Kujalleq, Birger Lilja Kristoffersen

## Still less respect for environmental protection in Greenland

There is little doubt that the new government will face a series of environmental challenges. Greenland has some of the world's largest undiscovered oil and gas resources and some of the largest mineral resources. Furthermore, there are now 90 active large-scale mining projects (prospecting, exploration and exploitation)<sup>2</sup>, covering thousands of square kilometres, and almost all related to surface mining projects, often at high altitude. Most of them are located in Southern Greenland. During 2020, 17 new mineral exploration licences were granted, which is a considerable increase compared to previous years.

One of the reasons for the increasing environmental problems is the fact that Greenland is not party to the Aarhus Convention, and its environmental legislation does not mandate strategic environmental impact assessments for mineral exploration

areas. This means that few areas in principle are excluded from being licensed and also that the public is not informed in advance on which areas could be designated<sup>3</sup>. In its new mineral and oil strategy, the former government opened up the world's biggest national park in North Eastern Greenland for oil exploitation<sup>4</sup>. And since January this year, a mining project in Eastern Greenland, where a Canadian company plans to exploit 12.8 million tons ore annually, is now in the pre-hearing phase. The entire exploration area is located in Greenland's National Park<sup>5</sup>.

Up until the elections, the threats to the Kujataa UNESCO WHS had been rapidly escalating. Two of the biggest mining projects in the world – the Kvanefjeld uranium-REE project and the Kringlerne REE mining project are both located near the Ku-

jataa WHS. Not only do they threaten the WHS but they could destroy the environment in large parts of Southern Greenland, which possesses the country's richest biodiversity and is known as "Greenland's bread basket". Licensing them might also open up the floodgates for a string of other mining projects. The Kringlerne mining



Fig. 2: Mineral licenses in Greenland, 2010-2020.

Figure: Minex No. 53

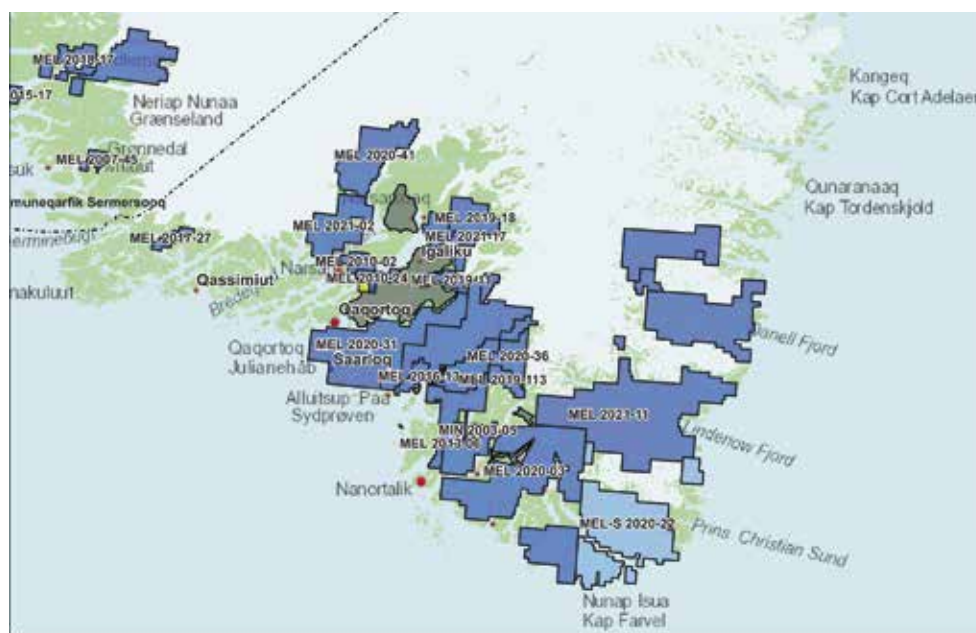


Fig. 3: License map of Southern Greenland. The grey areas represent the Kujataa UNE-SCO WHS and buffer zones.

Map: Greenland Minerals Authority, April 2021

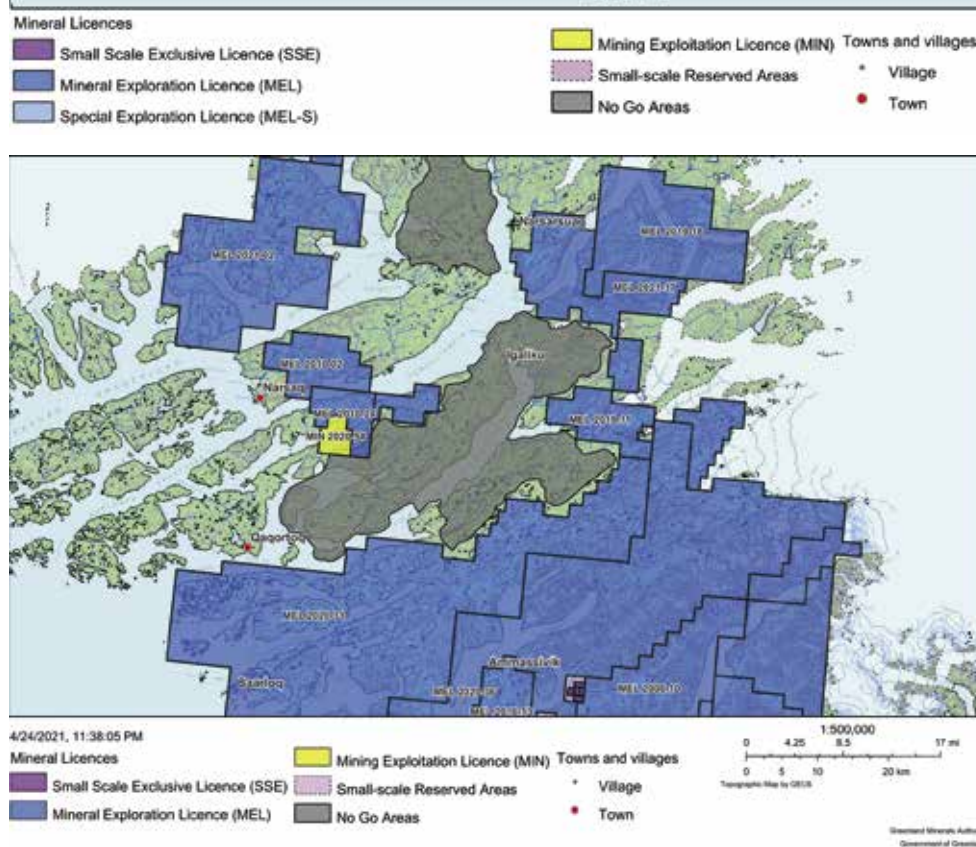


Fig. 4: Mineral licenses in Kommune Kujalleq. MIN 2020-54 (yellow area) marks the Kringlerne exploitation license area, MEL 2010-02 (blue area) the Kvanefjeld exploration license area. The grey areas represent the Kujataa UNESCO WHS and buffer zones. Map: Greenland Minerals Authority, April 2021

project was approved by the Greenlandic authorities in August last year and the Kvanefjeld project is currently submitted to a public hearing in the last phase of the Environmental Impact Assessment (EIA) of the project.

### Licensing the Kringlerne mining project

There is little doubt that the licensing of the potentially gigantic<sup>6</sup> Kringlerne REE mining project is highly controversial. The approval by the Mineral Resources Authority was based on

seven years old EIA public consultation material and the public response from that time<sup>7</sup>. The material, which did not include the latest version of the EIA report, also had no mentioning of the plans for a chemical separation plant that the former government wants to be a part of the project. The plant would have a daily consumption of up to 2,000 tons of sulphuric acid. Also, the EIA report from 2013, which was the basis of the licensing, only describes ten years of mining operations – five years for each of the two open mine pits – whereas the exploitation license allows 30 years of operations.



Furthermore, the Mineral Resources Authority granted the exploitation permit before approval of a plan for the operation and closure of the mine<sup>8</sup>. The owner of the mine, the Australian company Tanbreez Mining Greenland A/S, was only required to get the plans approved by the end of 2022 at the latest<sup>9</sup>.

Measured by the requirements of Greenland's Mineral Resources Act<sup>10</sup>, there is little doubt that the hearing material was insufficient. This is clearly reflected in the position papers by KANUKOKA – The National Association of Greenland's Municipalities (which was dissolved in 2018), Kommuneqarfik Sermersooq and DTU Wind Energy. Kommuneqarfik Sermersooq – neighbour municipality to Kujalleq Municipality - writes flat out that it "is worrying that (the EIA main report) is estimated to be sufficient by the Environmental Agency for Mineral Resource Activities, DCE – Danish Centre for Environment and Energy at Aarhus University, and Greenland's Institute of Natural Resources without any kind of background material".

Kommuneqarfik Sermersooq also points out that the mining project will harm agriculture in the region. This is significant, because Kringlerne is located close to the Kujataa UNESCO WHS, which is a historic agricultural site. Avataq, WWF and Greenpeace (all green NGOs) have similar and not less serious objections<sup>11</sup>.

### The Kvanefjeld licensing process is still going on

However, the biggest and most controversial of the mining projects near the Kujataa WHS is the Kvanefjeld uranium-REE mining project, owned by the Australian company Greenland Minerals Ltd., GML. According to GML, in addition to containing the second biggest uranium<sup>12</sup> and by far the largest thorium deposits, the Ilimaussaq-complex, of which Kvanefjeld is a part, possesses the second-largest deposits of rare earth elements in the world. The mine, which would be the world's second-largest open pit uranium mine, is located on top of a mountain, almost one kilometre above sea-level, only six kilometres away from Narsaq, a town of approximately 1,500 inhabitants, and also near some of the parts of the Kujataa WHS.

On December 18<sup>th</sup> 2020, the Greenlandic government started public hearings on the Kvanefjeld mining project as part of the EIA process. The hearings were projected to go on for 12 weeks, until 12 March 2021, whereafter the government would decide whether to grant GML an exploitation permit or not<sup>13</sup>. Almost immediately, questions were raised why the government had not notified its neighbours considering that Greenland has been party to the Espoo Convention on Environmental Impact Assessment in a Transboundary Context since 1997<sup>14</sup>. Because of increasing public opposition to the mining project, particularly in Southern Greenland, the public consultation period was extended to 23 weeks, and is expected to end by June 1<sup>st</sup> 2021<sup>15</sup>.

### Kujataa's Outstanding Universal Value (OUV) under threat

It seems obvious that the OUV of the Kujataa WHS is under threat from both the Kvanefjeld and the Kringlerne mining projects as well as from the cumulative impact of all the mining projects in the region. Whereas the documentation of the Kringlerne project is so insufficient and lacking in detail that it is difficult to predict its impact on the Kujataa WHS, this is not the case for the Kvanefjeld project.

Kujataa's unique farming traditions have been a determining factor in designating it as WHS. However, the Danish Risø National Laboratory has estimated<sup>16</sup> that up to a thousand tons of radioactive dust might be released annually from just the Kvanefjeld open pit mine due to material handling, hauling and blasting and from the ore stock and waste rock piles. Furthermore, if the tailings by some unforeseen cause such as leakages, technical problems, etc. would turn dry, massive amounts of radioactive and toxic dust would be blown away. The predominant wind direction and the direction for the strongest winds are east- and north-eastwards, where the Kujataa WHS is located. Because of the dust, domestic animals and wildlife in the contaminated areas would be chronically exposed to radioactive and other toxic species via drinking water, food and air.

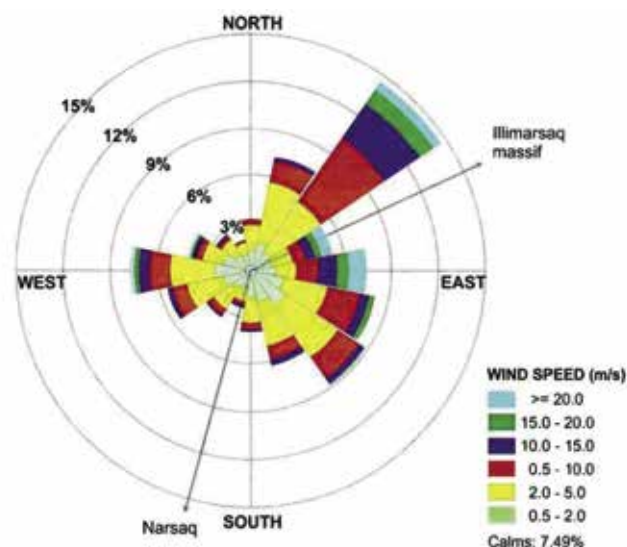


Fig. 5: Wind directions and speed recorded from Kvanefjeld weather station.  
Figure: Greenland Minerals Ltd., Kvanefjeld EIA

Furthermore, seepage, leaks and spills of liquids from the tailings from both mining projects will cause contamination of groundwater and rivers by radioactive and non-radioactive toxic chemical species. Seafood would become contaminated as well, due to the substantial discharges of wastes into the Fiords and the coastal sea. Although there is no significant visual impact of the mining projects on the WHS, the landscape would change in the development from a rural to an industrial area. Among others, new ports, port facilities and accommodation villages have to be built and corresponding support infrastructure implemented.

## Recommendations

Especially in Southern Greenland, there has long existed a notion that the Kujataa WHS in its present form has been delineated to accommodate particularly the Kvanefjeld mining project, and that the potential impacts of the other mining projects surrounding the WHS have not been considered.

In March 2018, a proposal from local organisations was submitted for an extension of the WHS in order to address this

issue<sup>17</sup>. Generally, the proposed sites which provides the arguments for the enlargement of the Kujataa WHS to include large parts the Erik Aappalaartup Nunaa Peninsula meet a wide range of selection criteria for nomination to the WH Tentative List<sup>18</sup>. So far, the proposal has not had much political and institutional support, but that could change with the new political leadership in the government and in Kujalleq Municipality, where the Kujataa WHS is located. Thus, it would make sense for the UNESCO World Heritage Centre to cooperate with the Greenlandic and Danish authorities to facilitate local endeavours to extend the boundaries for the Kujataa WHS<sup>19</sup>.

Finally, a Heritage Impact Assessment of the Kringlerne and the Kvanefjeld mining projects should be carried in order to analyse their possible effects and consequences of development on the OUV of the Kujataa WH properties.

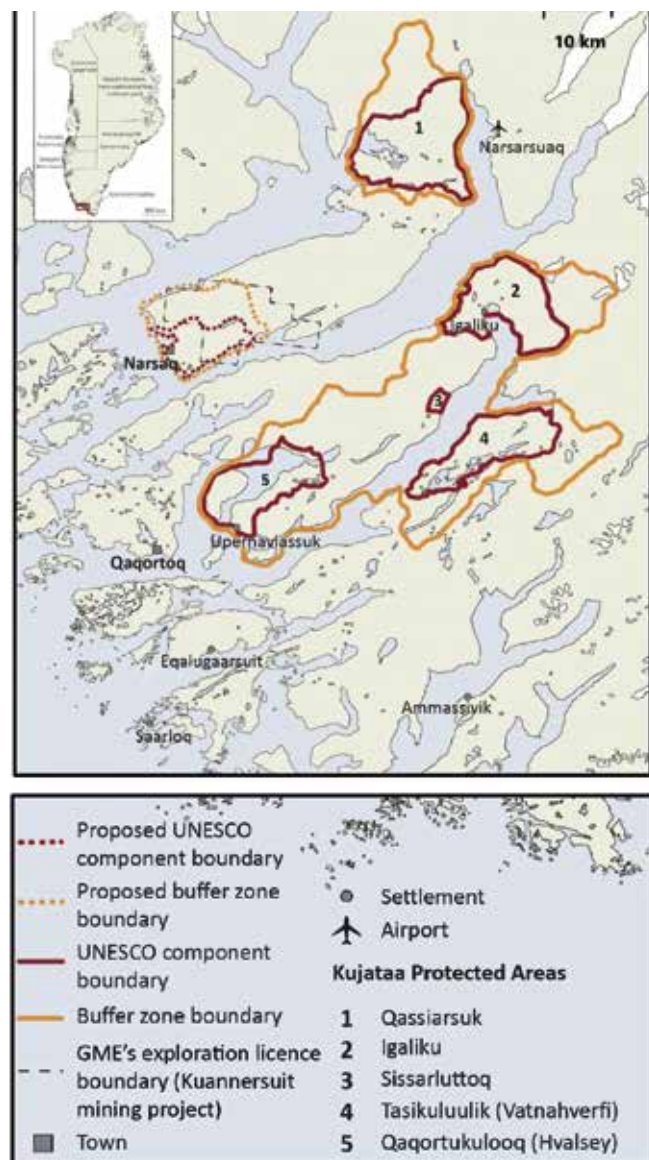


Fig. 6: The UNESCO Kujataa WH areas and the proposed enlargements. The proposed UNESCO component boundary has been established in view of the density of unique sites. It integrates both identified sites of vestiges from Norse agriculture (Landnamsgården at South of Narsaq and Narsap Ilua at North) and active farms, according to the high specificity of the sheep farming in South Greenland, which is one cause among others of the unique landscapes of Kujataa. The whole town of Narsaq has been included too, for two main reasons. First, according to its history, highly connected with the colonial past as a former trading colony of Qaqortoq, it has been a zone of exchanges and meetings since the first time of colonization in Greenland, which explains the particular town-planning. Secondly, according to its position as a centre of the Arctic agriculture from the Viking time until today. The river system has been used to set up the borders of the UNESCO area, bounding the relevant zones for the farming activity (Taseq Lake).

Map and caption: Marine Duc, 2018 / WHW

## Notes

- 1 Inuit Ataqatigiit og Partii Naleraq, Soliditet, Stabilitet, Vækst, Koalitionsaftale (April 2021): koalitionsaftale\_DA.pdf (rocketcdn.me)
- 2 Government of Greenland, Ministry of Mineral Resources, Minex No. 53, Mineral Exploration Newsletter (2021): Minex53.pdf (govmin.gl)
- 3 For more information on Greenland's legislation in this field, see Ellen Margrethe Basse, Juridisk responsum om den gældende grønlandske lovgivning vurderet i lyset af Århuskonventionen, Juridisk Institut, Business and Social Sciences, Aarhus Universitet (June 2014): <http://kortlink.dk/naalakkersuisut/pk6q>
- 4 The park is also the 9th largest protected area in the world. The only larger protected areas mostly consist of sea. In 1977, the park was designated an international biosphere reserve by UNESCO.
- 5 Naalakkersuisut homepage, Pre-consultation on the terms of reference for SIA and EIA reports for the Malmbjerg molybdenum project: Pre-consultation on the terms of reference for SIA and EIA reports for the Malmbjerg molybdenum project - Naalakkersuisut
- 6 In 2013, the Greenlandic government estimated that it contained more than 4,3 billion tons of ore, cf. Jørn Skov Nielsen, Status for Råstofaktiviteter, Præsentation, Departementet for Erhverv, Råstoffer og Arbejdsmarked, Slide 13 (2013), <https://docplayer.dk/18639768-Departementet-for-erhverv-raastoffer-og-arbejdsmarked-joern-skov-nielsen.html>
- 7 Naalakkersuisut homepage, Public consultation on the reports Social Impact Assessment (SIA) and Environmental Impact Assessment (EIA) in connection with Tanbreez Mining Greenland A/S' application for an exploitation licence for the Rare Earth Element (REE) eudialyte and the mineral feltspar at Kil-lavaat Alannguat (Kringlerne): <http://kortlink.dk/naalakkersuisut/2adwm>
- 8 According to § 38 of Greenland's Mineral Resources Act, a licensee who intends to exploit mineral resources must prepare a plan for the exploitation and activities, measures, etc. related thereto (an exploitation plan) and a plan for activities, measures, etc. in connection with the cessation of the exploitation and closure of any facilities, etc. (a closure plan). The Government of Greenland must approve the plans before the licensee initiates exploitation or activities and measures related thereto.
- 9 News of the licensing created a public stir, when it was revealed that the above-mentioned time schedule had been agreed upon during an investor conference in Canada at the beginning of March. Present here were representatives of the Tanbreez mining company, an American investor, officials from the Department of Mineral Resources, including the head of the department, the Minister of Industry and Mineral Resources himself, and representatives of Kujalleq Municipality, where the mining project is located. From the notes of the head of the Department of Mineral Resources, to which NOAH Friends of the Earth Denmark was granted access under Greenland's Freedom of Information Act, it is clear that the representatives of Tanbreez had asked directly for an exploitation license on grounds of economic necessity in order to be able to proceed with the project. For additional information, see Altinget, Miljøforkæmpere: Voksende minedrift er ødelæggende for det grønlandske miljø (September 7, 2020), Miljøforkæmpere: Voksende minedrift er ødelæggende for det grønlandske miljø - Altinget: arktis

- 10 Link to Greenland's Mineral Resources Act: Unofficial-translation-of-unofficial-consolidation-of-the-Mineral-Resources-Act.pdf (govmin.gl)
- 11 Among other things, the position papers emphasise the significant uncertainty regarding the annual mineral production and the de facto life-span of the mine (Greenpeace), that water polluted by lead and other heavy metals will spread to rivers and fiords from the planned tailings storage facility for tailings and waste rock in Foster Lake (KANUKOKA, Kommuneqarfik Sermersooq, Greenpeace, WWF), pollution by fluorine (DCE/GN, WWF, Avataq) and insufficient validation and assessments of dust and particle emissions and dissemination (KANUKOKA, Kommuneqarfik Sermersooq, DTU Wind Energy, WWF). According to Kommuneqarfik Sermersooq, mining operations will increase the quantities of dust in Narsaq town by 43 % and in Qaqortoq by 9 %. In addition to lead, the dust will contain uranium, thorium, zink, arsenic and other toxic elements. The mining projects CO<sub>2</sub> emissions, as they are described in the EIA report, equals 3,5 % of Greenland's total CO<sub>2</sub> emissions in 2012.
- 12 GMEL Company Presentation, Symposium Investor Roadshow, Slide 5 (April 2014): <https://www.slideshare.net/SymposiumEvents/greenland-minerals-and-energy-company-presentation-symposium-investor-road-show-april-2014>
- 13 Consultation homepage for SIA and EIA reports for Kvanefjeld: Consultation on SIA and EIA reports for the rare earth elements project at Kuannersuit (Kvanefjeldet) - Naalakkersuisut
- 14 The projected activities at Kvanefjeld are listed several places in the Convention's Appendices 1 and 3 and in addition to be the by far biggest and potentially most polluting industrial project in the history of the Danish Realm, it will according to the EIA report increase Greenland's current total CO<sub>2</sub> emissions by 45 per cent.
- 15 Pressemeddelelse, Naalakkersuisoq for Erhverv og Råstoffer: Høringsperioden for Kuannersuit forlænges (January 3, 2021), Høringsperioden for Kuannersuit forlænges - Naalakkersuisut
- 16 Kim Pilegaard, Preliminary environmental impact statement for the Kvanefjeld uranium mine, Risø National Laboratory, Page 44 (September 1990), [https://backend.orbit.dtu.dk/ws/portalfiles/portal/56472284/ris\\_m\\_2875.pdf](https://backend.orbit.dtu.dk/ws/portalfiles/portal/56472284/ris_m_2875.pdf)
- 17 NGO press release, Kvanefjeld Mining Project Endangers UNESCO World Heritage Site (August 8, 2018), <https://noah.dk/node/1109>
- 18 With respect to Kvanefjeld and the Ilimmaasaq Complex with their more than 200 different minerals, mainly criteria 7 and 8 are relevant. See UNESCO World Heritage Convention homepage: <https://whc.unesco.org/en/criteria/>
- 19 The Kujataa WHS is managed by a steering group of representatives from the Greenlandic government, the Greenland National Museum and Archives, Kujalleq Municipality, village councils, farmers, the Danish Agency for Culture and Palaces and the tourism industry.



# The Lake District: World Heritage Site and Favourite Off-road Destination

Fritz Groothues (LakesWatch and Lake District Green Lanes Alliance)

Since our report last year there has been no change in two of the projects endangering the Lake District's OUV: plans for a zipwire at the Honister slate mine are going ahead, and the Lake District National Park Authority together with Forestry England are still actively considering a gondola/cable car and other major developments at Whinlatter.



Fig. 1: The English Lake District WH Site.

Map: Open Street Maps

This year's report focuses on the LDNPA's (Lake District National Park Authority) persistent refusal to protect the landscape against the impact of off-road motor vehicles on unsurfaced tracks (green lanes). The Authority is ignoring explicit requests from the World Heritage Centre and ICOMOS to put an end to this activity.

The damage done to the Lake District's OUV by off-road motor vehicles is continuing to increase, impacting in particular on its agro-pastoral heritage and tranquillity. At least 18 tracks categorised by the LDNPA as highly vulnerable or vulnerable to motor traffic are seriously affected. Their overall length is 35km, representing 29% of all green lanes open to motor vehicles,

As the first ICOMOS report from May 2019 noted, information about green lanes is continuing to spread on social media. It is now possible to find footage about many of the tracks on YouTube, posted by the off-road drivers themselves, with detailed instructions on where particular green lanes are located. The presence of vehicles from other countries shows that the Lake District has become a destination of choice for off-road motorists across North-West Europe. That the National Park Authority should allow this to happen in a World Heritage site is a breach of its commitment to protect the integrity of the Lake District.



Fig. 2: A green lane near Little Langdale.

Photo: Stephen Walker

Any hopes that the Covid lockdown would bring a change in attitudes and a new determination to protect the World Heritage site quickly evaporated: as the graphs show, levels of off-road traffic reached new peaks on three green lanes for which we have official data. Traffic volumes on the green lane from High Nibthwaite to Parkamoor on the eastern side of Conistoun Water are particularly troubling. Although they were lower than for High Tilberthwaite in 2007, they have more than tripled since then. Both High Oxenfell and High Tilberthwaite have seen a sharp increase in traffic – over 30% – since 2019.

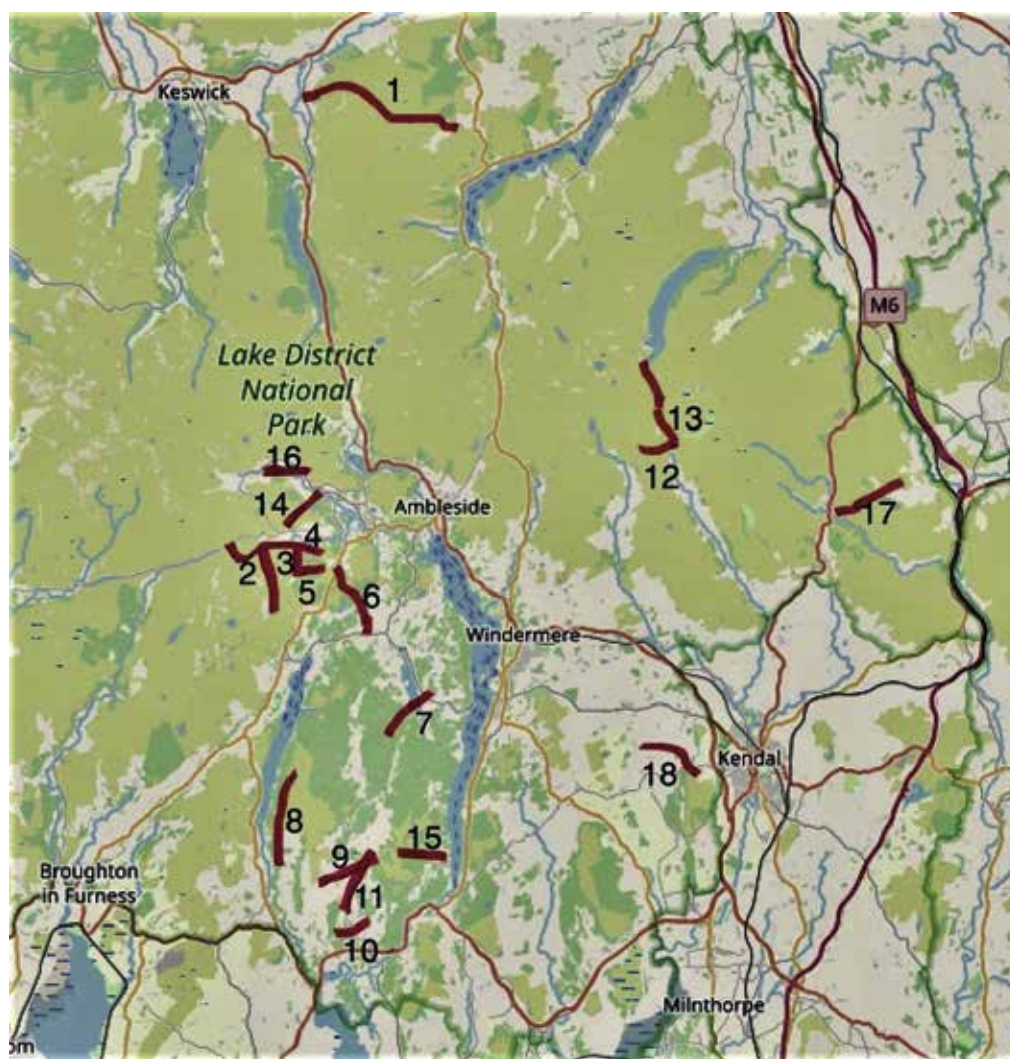


Fig 3: Routes in the Lake District affected by 4x4 driving.

Map: Open Street Maps / LDGLA

**Scale and severity of the problem:** ≠Critical routes in the Lake District

1. Old Coach Road (U2236/ U3132)
2. High Tilberthwaite (U5001)
3. Hodge Close or Stang End (U5002)
4. Little Langdale (U5003)
5. High Oxenfell (U5004)
6. Tarn Hows or Old Mountain Road (U5015)
7. Grizedale-Esthwaite (U5050)
8. High Nibthwaite–Parkamoor (U5051) – managed by a discretionary TRO
9. Ickenthwaite (U5064)
10. Moss Wood (U5203)
11. The Riggs (U5213)
12. Stile End (U5255)
13. Gatscarth Pass (U5257) – managed by a permit-based TRO
14. Elterwater/Owlet's Nest (U5529)
15. Rusland Pool (U5566) – managed by a seasonal TRO
16. Old Langdale Road (U5739)
17. Breast High Road (U3278)
18. Gamblesmire Lane (U5333)

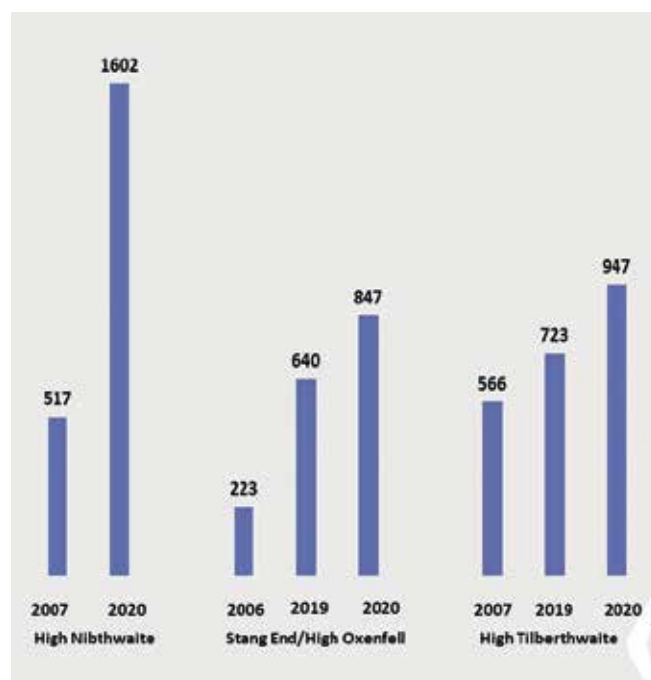


Fig. 4: Vehicle numbers at High Nibthwaite\*, High Oxenfell and High Tilberthwaite (quarter ending 30 Sep). No 2019 data available for High Nibthwaite.

Graphic: Duddon Electronics Ltd / LDNPA

## 20 years of opposition against green lane driving

In the late 1990s the LDNPA agreed to a voluntary restraint scheme for green lane driving, the Hierarchy of Trail Routes (HOTR). The scheme, launched on the initiative of off-road motorists, drew immediate criticism from community leaders, including the Cumbrian Association of Local Councils. They said it would lead to an increase in the number of vehicles, as indeed proved to be the case.

In 2000 a campaign group in the Langdales area started alerting the National Park Authority to the appalling effects of green lane driving on the landscape, a unique symbiosis of nature and human activity. Where people had been able to enjoy the relative wildness and beauty of mountain views, sheep farms and abandoned quarries, they could no longer be sure that their walk would not be disturbed by convoys of large four-wheel drives and motorbikes. Sheep farmers found their work was being disrupted by increasing numbers of vehicles driving through their yards, particularly at weekends. When moving sheep to and from the fells on narrow tracks farmers now ran the risk of having their route blocked by motor vehicles.



### The National Park proposes a ban...

In 2003 the LDNPA published proposals to put an end to green-lane driving. Leaflets issued by the Authority described it as incompatible with National Park purposes. According to the LDNPA's corporate operations director the voluntary restraint scheme HOTR had not eliminated 'erosion, irresponsible drivers and regular complaints about inappropriate vehicle use'. It was the hope of the Authority that a ban would make the practice of green lane driving socially unacceptable.



Fig. 5: 4x4s on the High Oxenfell track.

Photo: LDGLA

### ... and then changes its mind

The official LDNPA minutes of the HOTR advisory group of 23 September 2003 reveal that, faced with this prospect, the umbrella group for off-road motorists, LARA, withdrew its cooperation with the National Park Authority.

The minutes of 12 January 2004 sum up what happened next: "LARA are ... cooperating again" and "The LDNPA were revising policy AR4 [on green lane driving] in the draft National Park Management Plan."

Two conclusions can be drawn:

- h) Even with relatively low numbers of off-road vehicles on green lanes the LDNPA had reached the view that the practice was incompatible with National Park purposes and needed to be stopped for the sake of conservation.
- i) Between September 2003 and January 2004 off-road motoring groups became the dominant influence over National Park policy making on access to green lanes. They continue to set the LDNPA agenda to this day.

### ICOMOS technical reviews and the LDNPA response

In detailed reviews of two tracks near Little Langdale ICOMOS commented on the impact of green lane driving on landscape and farming, concluding that the practice was a potential threat to the OUV and should be eliminated.

ICOMOS also rejected the LDNPA's argument that green lane driving was taking place at the time of inscription and was therefore, at least implicitly, accepted by ICOMOS and the World Heritage Centre. ICOMOS quotes the following passage from the nomination document:

*'Coniston has featured in conservation battles over access and recreational use of lakes and tracks since the 1950s. These battles have focussed on the balance between recreation and quiet enjoyment. Consequently the use of power boats and water skiing are now controlled on the lake and legal battles continue over the right to use motorised vehicles on former stock and quarry roads.'*

The clear impression created by the LDNPA is that it can be trusted to pursue a policy of conservation. This trust proved to be misplaced.

### Protection for off-road motorists

In its final decision on the two green lanes near Little Langdale in October 2019 the LDNPA rejected a ban and opted for a management approach, precisely the same approach that had been in place for 20 years and had demonstrably failed to curb vehicle numbers and protect the tracks. This is the decision the off-road motorists had asked for. It deliberately ignored the ICOMOS request to eliminate green lane driving, as well as brushing aside representations from the National Trust, the Friends of the Lake District, the Ramblers, the Herdwick Sheep Breeders Association and many others.

### Summary

Given the large-scale degradation of the OUV caused by off-road motor vehicles on green lanes and the potential danger to the OUV by the planned Honister zip wire and the projected Whinlatter cable car, we now ask the World Heritage Centre for a Reactive Monitoring Mission with a view to determine whether the property should be inscribed in the List of World Heritage in Danger.



Fig. 6: Recreational 4x4s near Tarn Hows.

Photo: LDGLA



# The Curonian Spit: In Danger of Losing Its Outstanding Universal Value

Alexandra Koroleva, Ecodefense! Russia



Fig. 1: A classic look of the foredune: an uninterrupted protective coastal ridge, completely covered with vegetation; its sea slope is steep, its leeward slope is gentle. Northeast of the Epha's Height tourist route, 30/09/2018.

Photo: Aleksandra Koroleva

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

According to the description of the Curonian Spit as a World Heritage Site (WHS) No.994, the human-made protective coastal dune ridge (the foredune), formed in the 19th century, as well as unique methods of protective coastal dune ridge management are material and non-material elements which shape its cultural landscape. Hence, they are conditions for authenticity and integrity to determine the Outstanding Universal Value of the site (Fig. 1).

The Russian State Party does not fully fulfill its responsibilities, and ignores dangerous trends that can lead to the disruption of the universal value of the WHS. The Curonian Spit National Park (CSNP) administration has been entrusted to manage the Russian part of the Curonian Spit.

In the period of 2018–2020, Ecodefense! monitored 48 km of the foredune in the Russian part of the Curonian Spit. The presented report is a result of field observation and 2006–2020 satellite data analysis. The report provides findings for the foredune state as of November 2020, also other data gleaned from open sources.

The rate of destruction of the foredune integrity is increasing on the entire seacoast of the Russian part of the Curonian Spit: While in 2001 over 50 blow-out hollows (destroyed areas of the foredune where sand has been removed) were detected, there were 170 hollows in 2005, and 333 of them in 2016. Between 2007 and 2014, 39 new hollows emerged, and already 81 between 2014 and 2016<sup>[1, 2]</sup>. Compar-

ison of satellite imagery collected between 2006 and 2020 demonstrates a tendency to foredune degradation throughout the Russian part of the coast, increasing between 2015 and 2020.

As a result of the 2018–2020 research results (as of November 2020) and examination of 2019–2020 spaceborne images, the Russian part of the sea coast of the Curonian Spit, 48 km in length, has been divided into 3 sections in accordance with the state of the foredune:

- Section No.1, in critical condition, from the southwestern border of the CSNP to the Zoological Institute Biological Station (ZIBS), 22.6 km long (47.1% of the total seacoast length),
- Section No.2, in unsatisfactory condition, from the ZIBS to Morskoye settlement, 19.5 km long (40.6%); and
- Section No.3, in satisfactory condition, 5.9 km long (12.3%). Thus, almost half of the foredune on the Russian part of the Curonian Spit is in critical condition (Fig. 2).

**Section No.1** (54°96'76"N 20°49'58"E – 55°09'26"N 20°72'91"E, 22.6 km long) experiences an extreme recreational



Fig. 2: The state of the foredune on the Russian part of the Curonian Spit (as of November 2020)

load: The resort town of Zelenogradsk in the vicinity, the Royal Forest touristic route, Lesnoye settlement, a number of holiday facilities, the National Park Museum, ZI Biological Station, and several parking lots are all located there. On a significant part of the coastline, the foredune has been fragmented and lost its protective function, its sea-facing slope has been washed away by storms, numerous hollows and through 'wind gates' have been formed; areas are marked where the dune ridge has completely been washed away and sand penetrates into the forest; the foredune has been destroyed and the beach borders



Fig. 3: Condition of the foredune on Section No. 1, southwest of the Lesnoye settlement ( $55^{\circ}01'76''\text{N}$   $20^{\circ}61'30''\text{E}$  –  $55^{\circ}02'07''\text{N}$   $20^{\circ}61'77''\text{E}$ ). Sea waves are eroding the bedrock coast. 13/10/2018. Photo: Aleksandra Koroleva

the bedrock coast, as well as the places where the destroyed coastal dunes began to move and advance towards the forest. The coastal ridge has virtually lost its function, is in a catastrophic state, and requires immediate intervention, reconstruction and repair (Fig. 3).

**Section No.2** ( $55^{\circ}09'26''\text{N}$   $20^{\circ}72'91''\text{E}$  –  $55^{\circ}23'80''\text{N}$   $20^{\circ}90'79''\text{E}$ , 19.5 km long) is heterogeneous. The most critical deformations of the foredune are adjacent to the beach access points off the ZIBS, Rybachy and Morskoe settlements, tourist routes, public transport stops and parking lots. Deformations are of anthropogenic origin and are associated with the chronic violation of the CSNP regime by its visitors. The foredune is covered with a network of pathways that gradually turn into wind gates, blown out by the wind and washed away by the sea. On the sea slope of the coastal ridge, anthropogenic impact is being aggravated by climatic phenomena. In between the affected areas, there are the ones in a satisfactory condition, but on average, the state of the protective coastal ridge throughout the section is unsatisfactory (Fig.4).



Fig. 4: The condition of the foredune on Section No. 2, off the KKNP administration building ( $55^{\circ}03'70''\text{N}$   $20^{\circ}64'58''\text{E}$  –  $55^{\circ}04'04''\text{N}$   $20^{\circ}65'03''\text{E}$ ). 22/04/2019. Photo: Timofey Zubarev

**Section No. 3** ( $55^{\circ}23'80''\text{N}$   $20^{\circ}90'79''\text{E}$  –  $55^{\circ}27'98''\text{N}$   $20^{\circ}95'36''\text{E}$ , 5.9 km long) is in a satisfactory condition and least affected by destruction: it is protected by a consistently wide beach, the absence of recreational load and the proximity of the state border. The reasons for the increased destruction of the foredune are the uncontrolled recreational load and the irresponsible policy the CSNP administration follows with regard to the protection of the man-made coastal dune ridge (i.e. inadequate measures for preservation, restoration, reconstruction and repair).

Neither the scope of work carried out by the CSNP to restore, repair and protect the foredune can be considered sufficient, nor are the technologies used adequate to the destruction and corresponding to the universal value of the site. In most of the critically destroyed areas, there is no sign of repair and restoration work at all.



In the last 10 years, the traditional technologies of the fore-dune restoration and repair, which represent the non-material heritage, have gradually been abandoned on the Russian part of the Spit. Disrupted surfaces are chaotically filled up with brushwood, poles and logs. Carelessly laid brushwood does not contribute to the sand accumulation, and these materials are washed off the sea slope by storm waves (Fig. 5–6).



Fig. 5: Repairing the fore-dune with brushwood and poles. Surroundings of the Les-nyoye settlement, 21/02/2019. Photo: Timofey Zubarev



Fig. 6: Logs and brushwood washed off the fore-dune, on the beach near the south-western border of the National Park. 20/02/2019. Photo: Timofey Zubarev

The Curonian Spit is experiencing recreational pressure that exceeds its recreational capacity and the limits for natural changes of its components and the entire landscape as a whole<sup>[3]</sup>. Over the past 8 years, the number of people visiting the CSNP has almost tripled: from 230,000 to 600,000 annually<sup>[4]</sup>. Of this number, only 20,000 (over the 3 summer months of 2020) visited the CSNP in organized groups<sup>[5]</sup>. Most of the visitors are unorganized tourists arriving by their cars. Unorganized visitors are not involved in environmental education, do not receive sufficient information about the universal value of the WHS and are usually only interested in beach vacation. Unorganized tourists violate the CSNP regime: they tread paths through the fore-dune on their way to the beach and sunbathe on the fore-dune crest. The only measure taken by the CSNP to limit the number

of visitors and reduce the pressure on the natural complexes of the WHS is to regularly increase the entrance fee. From January 1, 2021, the entry fee for a vehicle will be doubled. This is an inadequate measure: according to tour operators, the entry fee increase doesn't reduce the flow of unorganized visitors<sup>[6]</sup>.

The scale of the fore-dune destruction is exacerbated by climate change, and these changes cannot be ignored in the management of the WHS. In the Southeast Baltic, to which the Kaliningrad region belongs, an intensification of storms is recorded as a local effect of global climate change<sup>[7]</sup>. The scenario of complete erosion of the Curonian Spit is likely with an increase in the level of the World Ocean to 0.5 m, as a result of which 'islands will appear on the site of the Curonian Spit'<sup>[8]</sup>.

Over the past 10 years, the frequency of northerly and north-westerly winds has increased in the Southeast Baltic. The shores of the Curonian Spit, which stretches from southwest to northeast, are open to winds from west to north and, accordingly, to waves from these directions, therefore the greatest destruction after storms is observed there<sup>[9]</sup>. In January 2012, a storm hit the Kaliningrad coast, causing 80 million rubles damage to the Curonian Spit coast and the Sambia Peninsula coasts<sup>[10]</sup>. Climatologists have analyzed causes of the storm and indicated the likelihood of its recurrence<sup>[11]</sup>; however the CSNP administration does not seem to have drawn any conclusions from this. The situation recurred several times: the storms of 2013-2019 caused severe unalterable destruction of the fore-dune<sup>[9, 12, 13, 14]</sup>.

The existing policy implemented by the CSNP in relation to the fore-dune, and the lack of appropriate control by the Ministry of Natural Resources of the Russian Federation may threaten to disrupt the universal value of the Curonian Spit and lose its elements, the integrity of the fore-dune and the authentic methods of its restoration and repair.

### Given the above, Ecodefense! requests the UNESCO World Heritage Committee to

#### \* admit

- the management of the Russian part of the Curonian Spit World Heritage Site to be unsatisfactory, and management and protection activities being not sufficient to ensure the property's Outstanding Universal Value, including the conditions of integrity and authenticity at the time of inscription in the List, are sustained or enhanced over time (as required by the Operational Guidelines for the Implementation of the World Heritage Convention, § 96).

#### \* acknowledge

- the Russian State Party, responsible for management and protection of the UNESCO World Heritage Site, do not fully fulfill their responsibilities and ignore dangerous trends that can lead to the disruption of the Universal Value of the World Heritage Site.



**\* agree that**

- the Russian State Party undertakes insufficient measures to restrict, control and regulate the flow of visitors to the World Heritage Site;
- the Russian State Party undertakes extremely insufficient measures to preserve the human-made coastal dune ridge;
- the Russian State Party ignores the destructive impact of local phenomena of global climate change, such as more frequent and intensified storms, on the World Heritage Site.

**\* oblige**

- the Russian State Party to urgently develop a Climate Change Adaptation Strategy for the Curonian Spit WHS;
- to base the Strategy on local phenomena of global climate change in the Kaliningrad region, which has been analyzed by Kaliningrad climatologists in detail and has a critical impact on the Curonian Spit WHS;
- the Russian State Party to organize a complete monitoring of the state of the Curonian Spit natural complexes, including recreational and climate impacts on them, the results of which should provide the basis for the Strategy;
- in order to implement the Strategy, to develop a Climate Adaptation Program for the Curonian Spit WHS, which should contain scientifically grounded, practically adequate and financially secured measures to reduce the recreational pressure, regulate the flow of visitors and restore the fore-dune, the human-made coastal dune ridge;
- the Russian State Party, due to the urgent risk of universal value disruption, to instantly carry out an assessment of the condition of the foredune, to identify, on the basis of the assessment, the most dangerous and critical areas, to develop urgent restoration measures, and to proceed with restoration activities in the next season;
- the Russian State Party to study the historical experience of the creation, restoration and repair of the foredune, to get acquainted with the methods of restoration and repair of the foredune being carried out on the Lithuanian part of the WHS, to analyze its own unsatisfactory practice over the last decade, which have not prevented destruction of a significant part of the foredune, and to develop a realistic Fore-dune Restoration and Conservation Program, in accordance with its purpose and value;
- the Russian State Party to develop a system of measures to restrict, control and regulate the flow of visitors to the WHS. (incl. to submit to the Kaliningrad Regional Duma a proposal to increase the fees for violations of the KKNP regime; to restrict car access in the summer season, depending on the number of parking stalls available; to improve control over visitors in recreational areas by involving volunteers; to raise awareness of visitors about the code of conduct; to educate, via environmental education activities, about the Universal Outstanding Value of the World Heritage Site; to establish a tourist route infrastructure in accordance with the task of regulating visitor flows and reducing recreational digression of the Curonian Spit natural complexes).

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# The World Heritage Upper Middle Rhine Valley Faces Multiple Threats

Klaus Thomas and Elke Greiff-Gossen, Rheinpassagen Citizens Initiative



The Upper Middle Rhine Valley World heritage is **endangered** by

1. construction projects and the reshaping of the entire Loreley Plateau,
2. the constant strain and danger caused by rail traffic,
3. the planned construction of the Middle Rhine bridge,
4. the destruction of the landscape.

We have reported extensively and in detail about these threats since 2015.<sup>[1]</sup> This report is an update focusing only on new and hitherto unreported developments.

## Threat 1: Hotel Project on the Loreley Plateau

The settlement of the Loreley Plateau is proven to be one of the oldest human settlement areas in Europe. Pre-historic humans, Celts, Teutons and Romans lived on the plateau and left their traces of settlement. Researching them is to be promoted as part of the cultural heritage in the Upper Middle Rhine World Heritage Site. Further construction of roads, hotels, holiday villages or parking lots destroy these cultural assets and must be stopped (see Annex Fig. 1–4).

*“The World Heritage Committee recommended that the State Party on the one hand deny approval for the large scale hotel building; on the other hand, it encouraged the State Party to consider viable solutions for a smaller-scale redevelopment in consultation with the Advisory Bodies and all stakeholders. As a consequence, ICOMOS Germany asked the decision-making authorities of the state of Rhineland-Palatinate to initiate an architectural competition for a development plan of the cultural landscape of the Plateau.”<sup>[2]</sup>*

The architecture competition requested by ICOMOS was held. The winning project was a small hotel designed as a vineyard estate. Instead, however, a large three-winged, five-storey hotel and an additional 10–15 wooden holiday homes of different sizes (up to five storeys) with a capacity of at least 720 beds, have been approved, extending over a length of 350 m like a holiday village to the edge of the plateau. The total area covered by the project is 37,500 m<sup>2</sup>. These features far exceed a project rejected by ICOMOS before (see Annex Fig. 5 and 6).

A valid construction permit has already been granted, and the first partial construction application has been submitted. Construction was scheduled to start in spring 2021, but according to a recent news release the investor withdrew from the project, allegedly because of crippling noise protection regulations protecting from the open air concerts from the nearby stage. However, all existing plans and regulations upon which the project was based remain fully in force, and an only slightly-revised version of this grossly inadequate project could be built any time. This prospect is the more likely one since according to business experts a smaller hotel may prove uneconomic.

Development at a density and scale as envisioned by the investors' current plans, as well as the creation of a large parking lot along the opposite side of the access road, would do irreparable damage to this unique elevated landscape. The building dimensions must be reduced and the unresolved parking issue must be addressed before construction begins.

We consider it urgently necessary to call upon the state of Rhineland-Palatinate to stop the construction of this hotel and holiday complex until UNESCO (ICOMOS) has received all pertinent data relating to sizes, heights and influences on the visual axes. The effects of this holiday village on the visual axes must be assessed by the state of Rhineland-Palatinate (or ICOMOS) and not by the investor. ICOMOS must carefully examine the effects on the OUV and submit the results to the World Heritage Committee for decision (see Annex Fig. 7 and 8).

## Threat 2: Rail traffic

The impact of noise and vibrations on the environment continue to increase dramatically, and the people in the Rhine Valley are at considerable risk of accidents: A freight train loaded with crude oil tipped over in Lahnstein in October 2020. At least 180,000 liters of crude oil were spilled and penetrated into the soil, polluting the groundwater (Fig. 9).

In February 2021, several thousand tons of rock slipped onto the railway and the road during a massive landslide in Kestert (Middle Rhine). The railway line was blocked for four weeks, and still only one track can be used (Fig. 10).



Fig. 9

Photo: Klaus Thomas



Fig. 10

Photo: Klaus Thomas

We recommend urging the Federal Republic of Germany to demonstrate solutions that move all freight traffic out of the World Heritage site.

### Threat 3: Middle Rhine bridge

Plans for the construction of a Middle Rhine bridge have been resumed. With the initiation of the Spatial Planning Procedure (ROV), expert opinions were also revised. Those drawn up in the past (from 2009 onwards) have all been predominantly deficient and of only limited use. The new opinions that have now been submitted again have significant shortcomings, with figures not collected correctly or completely, and known but unreported facts, as for example:

1. The bridge would connect the A3 and A61 motorways and other trunk roads for integration into the European trunk road transport network (Fig. 11). However, figures for long-distance traffic are not included in the expert reports<sup>[3+4]</sup>
2. Rhine crossings across the bridge will have lanes for pedestrians and bicycles but will be 3,5 km outside the villages and thus of no practical use for them. It will lead to considerable additional motorized traffic. Regional traffic for Rhine crossings is presently 2,100 vehicles/day but expected to quintuple to 10,900 vehicles/day in the future. These figures are missing from the report.
3. The increase in traffic noise from long-distance traffic between the motorways and increasing road traffic in the valley are missing from the expert reports. Considerable road traffic noise will add to the ever-increasing railway noise.<sup>[5]</sup>

In the expert reports now submitted, the bridge height is given as 27 m. It is thus in the field of vision of Maus and Katz castles, and could possibly be seen from the Loreley Plateau.

We want to improve the Rhine crossing for ALL road users but without additional traffic noise, and with increased accessibility and sustainability. We call for efforts to be made to preserve the uniqueness of the cultural landscape. A huge concrete structure in the middle of the Rhine Valley and far away from communities would destroy this. In order to adequately address these issues, opportunities are needed to integrate the ferry crossings into the existing urban development.



Fig. 11

Graphic: Elke Greiff-Gossen



## Threat 4: Destruction of the landscape

### Wind power plants

The federal states of Hesse and Rhineland-Palatinate declare that no wind power plants will be permitted (Decision: 37 COM 7B.75 Upper Middle Rhine Valley). But the competent authority has now granted permission for the construction of three 200m high wind power plants in Boppard-Weiler (Rhineland Palatinate).<sup>[6]</sup> They are visible in the surrounding area and can also be seen from the opposite bank of the Rhine. Boppard is located in the core zone of the World Heritage Site where, according to the UNESCO Decision and to the sight line study, the construction of wind power plants is not allowed (Fig. 12).



Fig. 12

Graphic: LANIS, Canva, Elke Greiff-Gossen

### Günderodehaus

The Günderodehaus is a former film set built on one of the most exposed slopes above the Rhine in Oberwesel (Fig. 13). It was to be dismantled after the filming. Instead, the community of Oberwesel has now decided to accept building a hotel complex on this site. At least eight more houses, outdoor wellness facilities are planned.<sup>[7]</sup> Roads are to be laid out and parking spaces built. The hotel is destroying the pristine landscape which includes the UNESCO protected Rhine hillsides.



Fig. 13:

Photo: Klaus Thomas

### Quarry near Sooneck Castle

The existing huge quarry on the slopes above the Rhine around Sooneck Castle near Trechtingshausen (core zone) has been criticized as incompatible with the OUV since the Upper Middle Rhine Valley was added to the World Heritage List in 2002 (Fig 14). The owner has now applied to enlarge the quarry by another 8 hectares.<sup>[8]</sup> The community of Trechtingshausen supports the project.



Fig. 14

Photo: Klaus Thomas

### Other large-scale buildings

Large-scale shopping centers have been built near the banks of the Rhine in the light industry area of Oberwesel (Fig. 15) and outside the center of Kamp-Bornhofen (both core zones of the World Heritage Site). The large-area, hall-like buildings are designed according to the plans and needs of the discounters and have no relation to the architectural style or the building culture of the Middle Rhine or the landscape. However, they can be clearly seen from surrounding viewpoints. They are like foreign bodies in this environment. In addition, access roads and parking spaces further disrupt the landscape.



Fig. 15

Photo: Elke Greiff-Gossen

It can be assumed that more such shopping centers will be built in the World Heritage area. In this context, we propose to classify the construction of such shopping centers outside of the densely built-up settlements as incompatible with the OUV. We suggest that basic guidelines for new or large-scaled buildings in the World Heritage area should be included in the Management Plan.

### Federal Horticultural Show

In connection with plans for the Federal Horticultural Show BUGA 2029, the Upper Middle Rhine Valley World Heritage Site is currently undergoing a major transformation phase. Detailed plans of the show, however, have not been made public. It must be assumed, however, that the vineyards on the steep slopes of the Rhine valley which are a defining feature of the cultural landscape, will be "included" in the show and therefore altered in appearance and function.

For all these planned developments, we urge UNESCO to request the State Party of Germany to submit all relevant planning documents according to §172 of the Operational Guidelines, and not to proceed with any final decisions before they have been examined by UNESCO/ICOMOS.

## Conclusion and Recommendation

We recall that the World Heritage Committee has previously

- demanded the dismantling of the summer toboggan run on the Loreley Plateau (37 COM 7B.75)
- rejected a holiday resort in St. Goar-Werlau similar to the one planned now on the Loreley Plateau (43 COM 7B.83)
- requested Germany to bring its regulations for the installation of wind turbines in the World Heritage area in line with requirements to protect the OUV (43 COM 7B.83).

In view of this long and persistent history of disregard of the World Heritage Convention, the recent granting of construction permits for a hotel project which so grossly violates applicable regulations is obvious evidence that the German State

Party has no intention to comply with the World Heritage Convention. This constitutes an ascertained threat to the Property and therefore calls for its inscription in the List of World Heritage in Danger.

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- 8 <https://www.presseportal.de/pm/147656/4729361>
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## Appendix

Photographic documentation on the threats to the Loreley Rock.



Fig. 1 and 2: The tip of the Loreley Plateau before and during its redesign. The old "Berghotel" has been demolished; concrete surfaces dominate the space. Photos: Klaus Thomas



Fig. 3: Archaeological finds on the Loreley Plateau.

Source: M. Kramp [9]



Fig. 4: One of the places with registered settlement finds.

Photo: Klaus Thomas



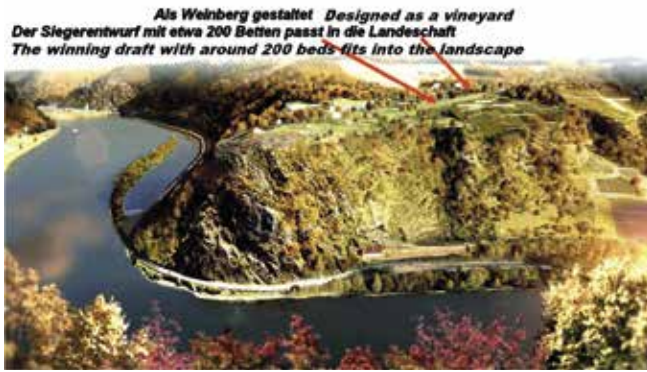


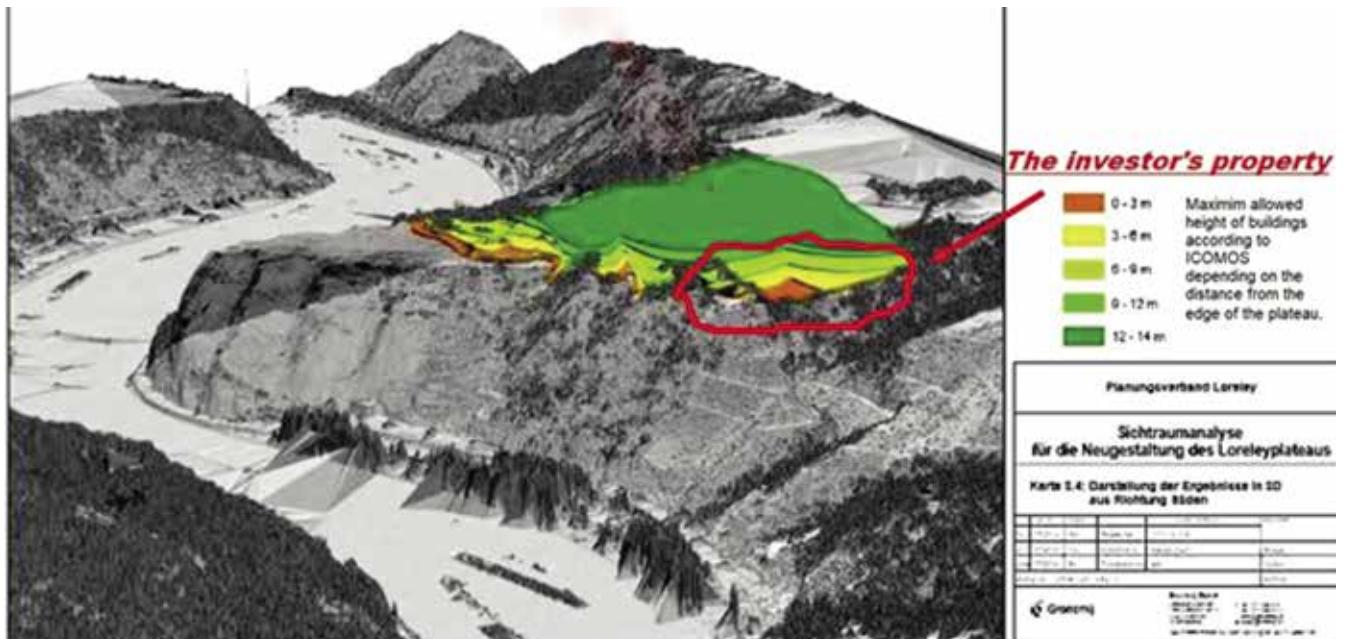
Photo: SDG Nord



Photo: NIDAG



Photo: Klaus Thomas



Graphic: Grontmij / Rheinpassagen Citizens' Initiative



# Semmering Railway and Surrounding Landscape in Danger: Incessant Water Inrushes

Christian Schuhböck and Josef Lueger, Alliance For Nature

ALLIANCE  
FOR NATURE

As early as in the 1990s, the nature and landscape protection organization “Alliance For Nature” warned of adverse effects the construction of the controversial Semmering Base Tunnel would have on the natural water balance of the multi-protected Semmering region (spring protection, landscape protection, Natura 2000 and European protection as well as UNESCO World Heritage area).

“Alliance For Nature” was the only environmental organization to take part in the environmental impact assessment process and has raised objections, complaints and revisions over the years. There is hardly any other major construction project in Austria that had so many approval notices revoked due to illegality as this billion Euro project.

Nevertheless, the two-tube tunnel construction was tackled from several places (Gloggnitz, Göstritz, Fröschnitzgraben, Gautschenhof, Mürrzusschlag).

## Earth and water ingress

On Easter 2019 there was the first water ingress in the municipality of Aue near Gloggnitz (Lower Austria) with the surface of the earth collapsing, creating a crater in the middle of a forest – only 200 meters from the nearest houses.

The second water and earth mass ingress occurred in July 2019 – this time during the intermediate attack in Göstritz (Lower Austria), which resulted in massive flooding of a tunnel section (see Fig. 1–3) and widespread pollution of the surrounding waters (Göstritzbach, Auebach, Schwarza) in the Neunkirchen district came. Another massive water ingress occurred in summer 2020 (see Fig. 4 and Video<sup>1</sup>).

Using this video, Prof. Dr. Josef Lueger, a court-certified expert for geology, mineralogy, soil protection and groundwater, issued an engineering geological statement with the following statements (translated from German by the authors):



Fig. 1



Fig. 2



Fig. 1–3: Water ingress at the Semmering Railway Tunnel construction site in July 2019

Photo: Patrick Wammerl / KURIER

<sup>1</sup> Video at [https://www.dropbox.com/s/ldr5vykj6s5peki/IMG\\_20200913\\_180057\\_659\\_MOD.mp4?dl=1](https://www.dropbox.com/s/ldr5vykj6s5peki/IMG_20200913_180057_659_MOD.mp4?dl=1)



Fig. 4: Water ingress at the Semmering Railway Tunnel construction site in summer 2019  
Photo: Alliance for Nature

*"The mountain water discharges associated with the construction of the tunnel cause far-reaching impairments to the water balance. According to the project, it is planned to lower the mountain water level by a few to several hundred meters to the level of the tunnel and to divert the incoming mountain water into the Schwarza and Fröschnitzbach. The planned tunnel seals are unable to maintain the natural water table. They only serve to keep the construction site free of water so that tunneling is possible. ...*

*"In the area of the water ingress at the Grassberg North Rim Fault, the subsidence is approximately 250-300 m. In the EIA procedure, I submitted calculations that document the effects on groundwater up to a few kilometers on both sides of the route.*

*In its natural state, the mountain water does not flow into the tunnel, but emerges in the form of springs, streams and wetlands. The diversion of the mountain water from the tunnel causes the groundwater level to drop a few kilometers away from the tunnel. When the water table drops, springs dry up and wetlands disappear. The upper reaches of streams also fall dry. In the middle and lower reaches, the amount of water decreases, and wells dry up. Exactly these consequences could be observed after the construction of the Semmering expressway with its tunnels. For example, the Görig spring and the Dürngrabenbach have fallen dry. As a result of the cumulative interaction of the Semmering expressway (summit tunnel) and the Semmering base tunnel, an intensification of these effects is foreseeable.*

*The disappearance of surface water has a variety of effects on the habitats that depend on it. Many plants and animals are affected. The loss of the vital element water can cause entire communities to die.*

*The water ingress, which was not foreseen by the project engineers, represents a considerable risk to life and limb for the miners on site. This risk results less from the amount of water that enters, but primarily from the rock masses that break down and that could possibly bury people."*

Prof. Lueger's engineering-geological statement has now likewise been conveyed by "Alliance For Nature" to the LKA NÖ for forwarding to the public prosecutor's office.

### **"Alliance For Nature" calls for construction freeze and political cancellation**

How many water ingresses still have to take place before those responsible finally come to their senses and understand that the tunnel construction is causing disastrous damage to nature? Do deaths actually have to be lamented before the construction of the controversial tunnel project is discontinued?

The environmental organization "Alliance For Nature" once again calls for the halt of the construction of the tunnel project and its political cancellation – similar to what happened in the previous Semmering Base Tunnel project when the entire tunnel was flooded due to a water ingress.

### **The Semmering Railway should be included in the List of World Heritage in Danger**

Because the Republic of Austria unilaterally reduced the original 8,861 hectare World Heritage area to an area of 156 hectares in favor of the controversial Semmering Base Tunnel. In response to pressure from the Austrian Commission for UNESCO, the German Commission for UNESCO even changed its 2013 World Heritage List – from "Semmering Railway with Surrounding Landscape" to "The Semmering Railway".

Normally, according to § 165 of the UNESCO World Heritage Guidelines, a new nomination should have been submitted after such a massive reduction of a World Heritage property. But this has not happened to this day. A classic example of how UNESCO has been duped by a State Party.

Millions of liters of fresh spring water are withdrawn from the natural water balance every day. Nevertheless, those responsible sit by and watch as this UNESCO World Heritage Site is sacrificed for a controversial billion Euro construction industry project.

# Government Tourism Development Continues Threatening Transboundary Lake Neusiedl

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WILDLAND  
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INSTITUTE

ALLIANCE  
FOR NATURE

In 2001, exactly 20 years ago, Lake Neusiedl and its surrounding cultural landscape were declared a UNESCO World Heritage Site for the following reasons:

“The Fertő/Neusiedler Lake area has been the meeting place of different cultures for eight millennia. This is graphically demonstrated by its varied landscape, the result of an evolutionary symbiosis between human activity and the physical environment. The remarkable rural architecture of the villages surrounding the lake and several 18th- and 19th-century palaces adds to the area’s considerable cultural interest.”



Fig. 1: Aerial view of the reed habitats in the World Heritage site.

Photo: Freunde des Neusiedlersees

However, due to the increasing construction of Lake Neusiedl through tourism projects over the past few decades, authenticity and integrity of the transnational UNESCO World Heritage Site “Fertő/Neusiedlersee Cultural Landscape” has been increasingly lost. A cross-border Environmental Impact Assessment (EIA) in accordance with the European EIA Directive, has not yet been made and is apparently not even aimed at by the two UNESCO World Heritage State Parties Austria and Hungary.

The World Heritage Watch 2020 report included an article about the Hungarian government’s large-scale tourism development project inside the core zone of Fertő / Neusiedlersee Cultural Landscape transboundary World Heritage site. Unfortunately, the efforts of civil society organisations on the two sides of the border have not resulted yet in resolving the problem and the Hungarian government proceeded with the project.

The Fertő Lake is part of a transboundary UNESCO World Heritage site with the Neusiedlersee National Park<sup>1</sup> and is also a UNESCO Man & Biosphere reserve<sup>2</sup>. The WH Secretariat provided an encouraging response to Hungarian citizens and offered help through the Austrian and Hungarian National Committees. On 7 August 2020, 30 civil society organisations from 20 countries called the UNESCO WH secretariat to inscribe the area on the list of endangered WH sites<sup>3</sup>.



Fig. 2: The reed roof houses as they used to be.

Photo: Attila Juhász

The suggested development in Soproni, Hungary aims at investing roughly 94 million EUR public fund in tourism facilities, which are not compatible with the protecting the cultural and natural diversity of the landscape that evolved through an evolutionary symbiosis between human activity and the physical environment. While tourism use would be possible, the planned tourism complex is not something to be considered as ecotourism or sustainable by its scale.

The government suggests the reconstruction of a few basic tourism facilities such as a beach and a few catering buildings, but also new infrastructure development such as

- 880 parking lots (estimated daily traffic of 3000 cars)
- port for 450+ yachts
- port for 350+ paddling boats

1 <https://whc.unesco.org/en/list/772>

2 <https://unesdoc.unesco.org/ark:/48223/pf0000366363>

3 [https://savefertolake.yolasite.com/resources/letter\\_Mechtild%20Rössler\\_Fertő\\_final.pdf](https://savefertolake.yolasite.com/resources/letter_Mechtild%20Rössler_Fertő_final.pdf)



- 4-star hotel right on the shore of the lake
- a sport complex with tennis courts
- a visitor centre
- 26 tourism apartments
- camping and motel.

The total new artificial cover of land surface would approximately be 13 hectares (see Fig. 3).

The project's second phase received its building permission by end of July 2020, and the construction company to proceed with water management works was selected by October 2020. As a result of the selection of the construction company the destruction of existing buildings with reed roof, which were specifically mentioned in the nomination document in 2001, has started in December 2020. All existing buildings will have to be demolished by 31 March 2021. The values of cultural landscape are being lost as one is reading this paper!

The design of the planned buildings were finally submitted to the representative of the local Friends of Fertő Lake civil society movement. In order to receive these images, the civil society had to appeal to the Freedom of Information Authority. These buildings will not only result in the destruction of reed habitats as they are planned directly on the shore of the lake, but do not fit with the architectural guideline of the existing management plan. The management plan explicitly refers to prefer the construction of one-story buildings with the reflection of traditional construction style of the area. However, the hotel and also the so-called eco-centre are much bigger buildings, while the 26 apartment houses will form a closed view from the direction

of the lake without using any traditional local building material. The ICOMOS Hungarian National Committee criticized the planned motel, sports complex and hotel in its statement of November 2020, and called the Hungarian government to reconsider its plans (see Fig. 4 and 5).

The most recent State of Conservation (SOC) report is only available on the UNESCO World Heritage Centre's website in its summary form (dated on November 2020). Unfortunately, it is unclear whether this report was submitted by a single state party or jointly by Austria and Hungary. Some of the statements in the SOC are appalling. There are the following disturbing observations in the summary of SOC:

The document argues that the Hungarian plan is to fix a "long standing shortages of landscape management works with the primary objective of breathing new life into the bathing culture". However, there are no evidences in either the 2001 nomination document or the management plan to promoting bathing culture in the WH site. So having said that, this investment is not only destructive, but completely irrelevant to the WH site.

At the bottom of the 2nd page, the summary refers to consultations with the Austrian State Party. However, the consultations were not initiated in advance during the planning phase but only after getting the permissions for the buildings. This is an appalling cynicism of interpreting transboundary consultation.

The SOC's reference to "notifications from third parties" – including the letter signed by 30 international NGOs from 20 countries – might be implied as unjustified messages to UNESCO WH Centre! Such notifications would not have been nec-



Fig. 3: Plan of the hotel, apartments and ecocentre.

Source: Lake Waterworks Development Plan Phase 2 (Köztí Zrt)



Fig. 4: Design of the new 4-star hotel.

Source: Közti Zrt

essary if the Hungarian State Party had been transparent about the development and informed both the Austrian State Party and UNESCO secretariat about the planned development.

The responsible county administrative body in Hungary considers no transboundary impact by pursuing this project. However, the analysis of the Environmental Impact Assessment (EIA) and the Natura 2000 assessment documents shows that this conclusion is false, because these assessments did not calculate with (a) the impact of increased traffic on roads and water, (b) the increased tourism pressure which will impact also the Austrian area and will require extra visitor management, law enforcement and interpretation efforts from both Fertő-Hanság and Neusiedlersee/Seewinkel National Parks), (c) the climate impact as the investment will result in 13 ha new artificial cover which might increase local temperature and decrease carbon sinking potential, and (d) the visual impact.

Because of the likely transboundary impact, the Hungarian government should have contacted the Austrian stakeholders within the framework of the Espoo treaty on EIAs<sup>4</sup>. However, the Hungarian authorities refused to share any information officially with the Austrian partners, and kept communicating that “every legal procedure was followed and no transboundary im-



Fig. 5: Design of the apartment houses.

Source: Közti Zrt

4 <https://www.unece.org/env/eia/eia.html>

pact is expected". This statement is based on a 1,5 page statement in the EIA<sup>5</sup>, which was insufficient because it did not analyse either the impacts during the operation of the tourism infrastructure or the climate impacts of the newly constructed 13 hectares of artificial cover.

The suggested new infrastructure elements should either be constructed at alternative locations outside the core area or shall not be built at all within the WH property. The investment poses the following challenges and threats to the world heritage status of the property:

- The State Parties are currently working on an updated Integrated Management Plan, so making a strategic decision about the touristic utilisation of the property is hardly possible.
- As stated in the Natura 2000 assessment for the development, there is neither an overriding social nor economic justification behind the investment.
- The EIA of the investment ignored the consultation with the Austrian stakeholders and did not take either the trans-boundary impacts during the operational phase or the long-term climate impacts into account.
- The suggested buildings do not fit into the authenticity of the landscape and do not seem to suit to the local rural architecture style, including the utilisation of reed.
- There has been no proper consultation with local stakeholders and citizens living in the surrounding villages of the property. The mayor of Sopron confirmed in his letter on 23 December 2020 that no consultation was made with the Austrian partners.
- The scale of the investment does not fit into the concept of developing rural tourism through the promotion of SMEs which would have larger retaining capacities for the local economy.

The investment will increase the tourism pressure on the area without defining how to mitigate its impact on the current infrastructure, human settlements and the natural values of the area. Construction works started on 17 December 2020 (see Fig. 6), but we still have a chance to save the majority of cultural and natural heritage values!



Fig. 6: View of the construction site. The houses on stilts have mostly been removed.

Source: From a drone video on <https://www.derstandard.at/story/2000125656225/pfahlbauten-am-neusiedlersee-muessen-in-ungarn-mega-hotelprojekt-weichen> posted on 8 April 2021. The author remains anonymous for fear of reprisals.



Fig. 7: The construction site is closed; access is forbidden

Photo: Friends of Fertő Lake Association

### Action Recommended to UNESCO / IUCN / ICOMOS

- UNESCO should inscribe the area on the list of endangered WH sites (in accordance with the provisions of §§ 177–191 of the World Heritage Operational Guidelines).
- UNESCO must call on Hungary to re-design the current tourism infrastructure plans in Sopron according to the proposal of ICOMOS Hungarian Committee.
- ICOMOS and IUCN should organise a Joint Reactive Monitoring Mission to the WH site.

### Demands from the two State Parties

- Hungary must reconsider the current plans by taking into account the critique of the ICOMOS Hungarian National Committee and the national civil society organisations which argue for the current development limited to the area that was originally used for tourism purposes.
- Austria must guarantee that the environmental impacts of all planned private investments around the lake are evaluated as one development and limit the opportunities of further tourism and property developments
- The two countries must put any development on hold until the newly developed joint management plan and joint management secretariat are set up through the co-financing of EU Interreg.<sup>6</sup>

5 [https://savefertolake.yolasite.com/resources/01\\_KHV\\_II\\_10%20fejezet.pdf](https://savefertolake.yolasite.com/resources/01_KHV_II_10%20fejezet.pdf)

6 <http://www.fertotaj.hu>



# Natural and Cultural Heritage of the Ohrid Region: Death by a Thousand Cuts

Sonja Dimoska and Daniel Scarry, Ohrid SOS



The Natural and Cultural Heritage of the Ohrid Region is a mixed UNESCO property of 94,729 hectares designated under World Heritage Criteria i, iii, iv, and vii and shared between the Republics of Macedonia (since 1979/80) and Albania (since 2019). Centred around Lake Ohrid, an ancient inland water with more species of plants and animals by surface area than any other on the planet<sup>1</sup>, it incorporates much of Galichica National Park, one of the most florally diverse mountains in Europe<sup>2</sup>, as well as archaeological, artistic and architectural capital amassed over 7,000 years of continuous human settlements<sup>3</sup>.

Since the Ohrid Region's inscription in the List of World Heritage, these values have been under assault from a mixture of pollution from wastewater, agricultural runoff, and sediment; hydrological interventions; wetland conversion; uncontrolled and often illegal construction; logging; boating; exploitative coastal and urban development; inappropriate solid waste disposal; abandoned mines; overfishing<sup>4</sup>; spring capture; and other threats<sup>5 6</sup>, all nested within a dysfunctional institutional network that is frequently walled off from civil society.

In spite of 19 recommendations from a 2017 World Heritage Centre, ICOMOS and IUCN Reactive Monitoring Mission (RMM) to the Republic of Macedonia's side of the World Heritage Site<sup>7</sup> (WHS), formalized in their entirety by World Heritage Committee Decisions 41 COM 7B.34 (Point 7) and 43 COM 7B.36 (Point

9e), progress on the vast majority of these issues has been inadequate to raise realistic hope of their resolution<sup>8</sup>.

## Climate change & Lake Prespa



Fig.1: Truckloads of soil dumped in the strictly protected 50m green belt that supposedly buffers Lake Ohrid's world-unique ecosystem at Daljan in Nov 2020.

Photo: ohridnews.com



Fig. 2: Bulldozer in the protected 50m green belt at Radozhda in the Municipality of Struga, part of widescale exploitation of the shore at this location. (October 2020.)

Photo: Ohrid SOS

Citizen Initiative Ohrid SOS has repeatedly called attention<sup>9</sup> to research conclusions that anoxia and species extinctions are growing likelihoods at Lake Ohrid, which has been assessed as one of Europe's most climate-threatened freshwater ecosystems.

1 Albrecht, C. and Wilke, T. (2008) Ancient Lake Ohrid: biodiversity and evolution. *Hydrobiologia*, 615, 103-140.

2 IUCN (2017) Natural and Cultural Heritage of the Ohrid region - 2017 Conservation Outlook Assessment. Gland, Switzerland.

3 Naumov, Goce (2016) Among wetlands and lakes: the network of Neolithic communities in Pelagonia and Lake Ohrid, Republic of Macedonia. In: *Southeast Europe and Anatolia in prehistory. Universitätsforschungen zur prähistorischen Archäologie. Band 293.* Editors: K. Bacvarov, R. Gleser.

4 As described by Ohrid SOS (2020) World Heritage on the Edge III, there is currently no concessionaire.

5 Kostoski, G, Albrecht, C., Trajanovski, S. and Wilke, T. (2010) A freshwater biodiversity hotspot under pressure – assessing threats and identifying conservation needs for ancient Lake Ohrid. *Biogeosciences*, 7, 3999-4015.

6 Spirovska et al. (2020) Study for the Valorization of Studenichishte Marsh. DOOEL Dekons Ema Ecological Consulting. Skopje, Republic of Macedonia.

7 World Heritage Centre/ICOMOS/IUCN (2017) Reactive Monitoring Mission Report Natural and Cultural Heritage of the Ohrid Region (Former Yugoslav Republic of Macedonia). World Heritage Centre, Paris, France.

8 Ohrid SOS (2020) World Heritage on the Edge III: Another Brick in the Wall.

9 See Ohrid SOS reports World Heritage on the Edge (2017), World Heritage on the Edge II: Engine of Neglect (2019), and World Heritage on the Edge III: Another Brick in the Wall (2020), all of which have been provided to the World Heritage Centre.



Fig. 3: Falling water levels at Lake Prespa, which feeds Lake Ohrid via karst channels.  
Photo: Ohrid SOS

tems<sup>10</sup>. Rising temperatures are forecast to amplify nutrient inflows from wastewater and agriculture, leading to oxygen depletion and deep water dead zones<sup>11</sup>. Under recent modelled scenarios, maintenance of pelagic oligotrophic conditions relies on extensive nutrient uptake by plants<sup>12</sup>, which may cause ecological shifts, evidence of which is already observed<sup>13 14</sup>. Dr. Zlatko Levkov, a global authority on diatoms, a species group with large heritage significance, has meanwhile opined that endemics will be lost from Lake Ohrid within the next decade<sup>15</sup>.

In 2020, the situation has taken another troubling turn after lake levels dropped by 5.5m at Lake Prespa (also shared with Albania), which supplies approximately 20% of Lake Ohrid's water via underground channels. Drought, water abstraction, and perhaps even hydro-geological changes may be the cause. Although chemical signatures remain relatively stable in the Lake Ohrid springs fed by these waters at present, nutrients in Prespa will concentrate as water levels fall<sup>16</sup> and it is unknown how long drying can continue before impacts occur in Lake Ohrid. Echoing a UNESCO-IUCN-ICOMOS Monitoring Mission in 1998<sup>17</sup> and World Heritage Committee Decision 32 COM 8B.49 from 2008, Recommendation 10 from the 2017 RMM repeated demands for an appropriate buffer zone for the Ohrid Region, and advised it to incorporate Lake Prespa<sup>18</sup>. The Republic of Macedonia has not only failed to create one, but also elaborated spurious excuses for Prespa's exclusion<sup>19</sup>.

Other measures to reduce the nutrient load such as upkeep and expansion of the Ohrid Region's wastewater system have begun, albeit a decade later than required<sup>20</sup>. However, little pro-

10 Markovic, D. et al. (2017) Vulnerability of European freshwater catchments to climate change. *Global Change Biology* 23, 3567–3580.

11 Matzinger, A. et al. (2007) Eutrophication of ancient Lake Ohrid: Global warming amplifies detrimental effects of increased nutrient inputs. *Limnology, Oceanography* 52(1).

12 Vermaat et al. (2020) Nutrient retention by the littoral vegetation of a large lake: Can Lake Ohrid cope with current and future loading? *Limnology, Oceanography* 9999, 3-13.

13 Talevska, M. et al. (2009) Biodiversity of Macrophyte Vegetation from Lake Prespa, Lake Ohrid and Lake Skadar. *Biotechnology & Biotechnological Equipment*, 23: sup. 1, 931-935.

14 Schneider et al. (2014) Eutrophication impacts littoral biota in Lake Ohrid while water phosphorus concentrations are low. *Limnologica*, 44, 90-97.

15 Interview with Prof. Dr. Zlatko Levkov of the Ss. Cyril and Methodius University Institute of Biology for webzine fakulteti.mk (published: 28 October 2020; available: 11 November 2020).

16 Matzinger et al. (2006) Is Lake Prespa jeopardizing the ecosystem of ancient Lake Ohrid? *Hydrobiologia*, 553:89–109.

17 UNESCO (1998) State of Conservation Report for the Natural and Cultural Heritage of the Ohrid Region. World Heritage Centre, Paris, France.

18 World Heritage Centre/ICOMOS/IUCN (2017) Reactive Monitoring Mission Report Natural and Cultural Heritage of the Ohrid Region (Former Yugoslav Republic of Macedonia). World Heritage Centre, Paris, France.

19 Ministry of Environment and Physical Planning (2020) Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029. Skopje, Republic of Macedonia.

20 Japan International Cooperation Agency (2012) Former Yugoslavia Republic of Macedonia Data Collection Survey for Ohrid Lake Environmental Improve-





Fig. 5: The red outline on the left shows all Struga Municipality with Struga City inside. The dark blue areas on the right is a tiny area in the city, the only place in the municipality where a construction moratorium is valid. Map: Cadastre of the Republic of Macedonia; Satellite image: Zoning map from MPNCHOR 2020/29, with blue shading added by Ohrid SOS



Fig. 4: The Nabizi 4-Towers project for a 292-apartment complex in Struga from the company's Facebook page on 20th Aug 2020.

Source: <https://www.facebook.com/NabiziMall/photos/pcb.3099771050141508/3099768036808476/>

gress has been made to connect parts of the sensitive east coast to the sewerage network; and wastewater leaks still occur. Rerouting the River Sateska to its natural corridor, which would significantly reduce nutrient and sediment inflows, is at the planning stage<sup>21</sup>.

## Construction

The slow pace of wastewater progress contrasts with what can be achieved by the construction industry. Although the Republic of Macedonia claimed to have put in place and then extended a moratorium on coastal and urban transformation in the Ohrid Region as per RMM Recommendation 6, the official decision was littered with exceptions<sup>22</sup>. It is no longer in force and its scope was functionally miniscule, especially in the Struga Municipality. The control systems, legislation, and planning documents supposed to preface its end are not complete.

For example, Nabizi, a Macedonian shopping centre, has recently rendered images for a 4-tower, 292-apartment complex near the waterfront in the city of Struga (Fig. 4), at a location where construction has long been underway due to the



Fig. 6: Billboard advertises 8-storey apartments that will obstruct monuments of culture, alter urban density, and exceed height restrictions in Ohrid's Old Town Core.

Photo: Ohrid SOS



Fig. 7: The Emin Mahmud Mosque fenced off in preparation for apartment construction.

Photo: Ohrid SOS

aforementioned exceptions from moratorium rules (see Fig. 5). With 10 floors (including ground) plus attic foreseen for each tower of the self-described mini-city, it controverts the recently

ment. Nihon Suiko Sekkei Co., Ltd., Tokyo, Japan.

21 UNDP (2020) Request for Quotation (RFQ 18/20) Basic Design for the River Sateska Restoration and Diversion in its Natural Riverbed and UNDP (2021) Request for Quotation (RFQ 17-2021) Development of a Basic Design for Sateska River Restoration and Diversion in its Natural Riverbed and urban Design for Infrastructure. Jordan Hadzi Konstantinov Dzinot 23, Skopje, North Macedonia.

22 Ohrid SOS (2020) World Heritage on the Edge III: Another Brick in the Wall.





Fig. 8: A rendered image shows apartment projects (shaded) that will block the House of the Stefoski Family (blue arrow), the Voska Hammam (yellow arrow) and the Emin Mahmud Mosque (red arrow). Photo: Institute for the Protection of Monuments of Culture and Museum Ohrid / Ohrid SOS

adopted Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020–2029 (MPNCOR 2020/29), which claims to cap heights in the relevant area at 5 floors (including ground). Displaying voting anomalies<sup>23</sup>, the approval process by the Commission for the Management of the Natural and Cultural Heritage of the Ohrid Region (CMNCHOR) for the Detailed Urban Plan (DUP) that enabled the Nabizi project was infirm: Even Commission Head Zoran Pavlov does not seem to have understood what acceptance of the DUP would entail (email communication).

Furthermore, construction of a large apartment block has also pushed forward immediately adjacent to the Emin Mahmud Mosque and in close proximity to the Voska Hammam and House of the Stefoski Family, all of which are monuments of culture in the Old Urban Core of Ohrid (see Fig. 6–8). On one hand, the 8-storey (including ground) building risks damage to the mosque; on the other, it is in obvious contravention of three supposed control measures: Article 7 of the Law on Declaration of Ohrid Old Town as a Monument of Culture, which among other things prevents alterations to the urban density of the area; a decision issued by the Directorate for Protection



Fig. 9: Following removal, significant parts of the illegal concrete production facility owned by former Municipality of Ohrid councillor Nefi Useini are still standing. (October 2020). Photo: Ohrid SOS

of Cultural Heritage, which states that the view and panorama

<sup>23</sup> Ohrid SOS (2019) World Heritage on the Edge II: Engine of Neglect. (See Supplementary Material.)



Fig. 10: A long wall is constructed inside the 50m protected green belt zone in May 2020 at Sveti Stefan. Photo: Ohrid SOS



Fig. 11: Removal of in-lake platforms and constructions in Lake Ohrid's protected green belt zone has been partial with many interventions still remaining such as these at Lagadin, 2018. Photo: Pawel Dobosz / Google Photos

from and towards protected monuments/the monument ensemble should not be disturbed<sup>24</sup>; and the MPNCHOR 2020/29, which theoretically disqualifies buildings over 3 floors here.

Other plans, such as for a large hotel bordering Studenchtishte Marsh, remain in the pipeline, while attempts to remove illegal constructions are sporadic and limited. As predicted<sup>25</sup>, partial demolition in 2019 of in-lake platforms and a house on Marko Nestoroski Road underwent reversals: The house was later completed and a platform rebuilt. Then, a 3-week period on the run-up to elections in June 2020 saw selected platforms (but not the house) more substantially removed along with part (but not all) of an illegal concrete production facility and the Green Space Hotel, which is now advertising for guests again from its Facebook page, location unchanged<sup>26</sup>.

Several platforms still extend into the lake; walls and supports for destroyed structures remain as lacustrine debris; illegal construction in both Ohrid City's Old Town Core and Lake Ohrid's

<sup>24</sup> Ministry of Culture, Directorate for Protection of Cultural Heritage (2019) Issuance of Protection Conservation Conditions (Number 08-113) for Remis DOOEL related to the construction of a new structure on Goce Delchev Road.

<sup>25</sup> Ohrid SOS (2019) World Heritage on the Edge III: Another Brick in the Wall.

<sup>26</sup> A post from the Green Space Hotel on 3 September 2020, two months after the demolition, states, "We await you to be our guests," with telephone number and email supplied. (Available 25 November 2020)

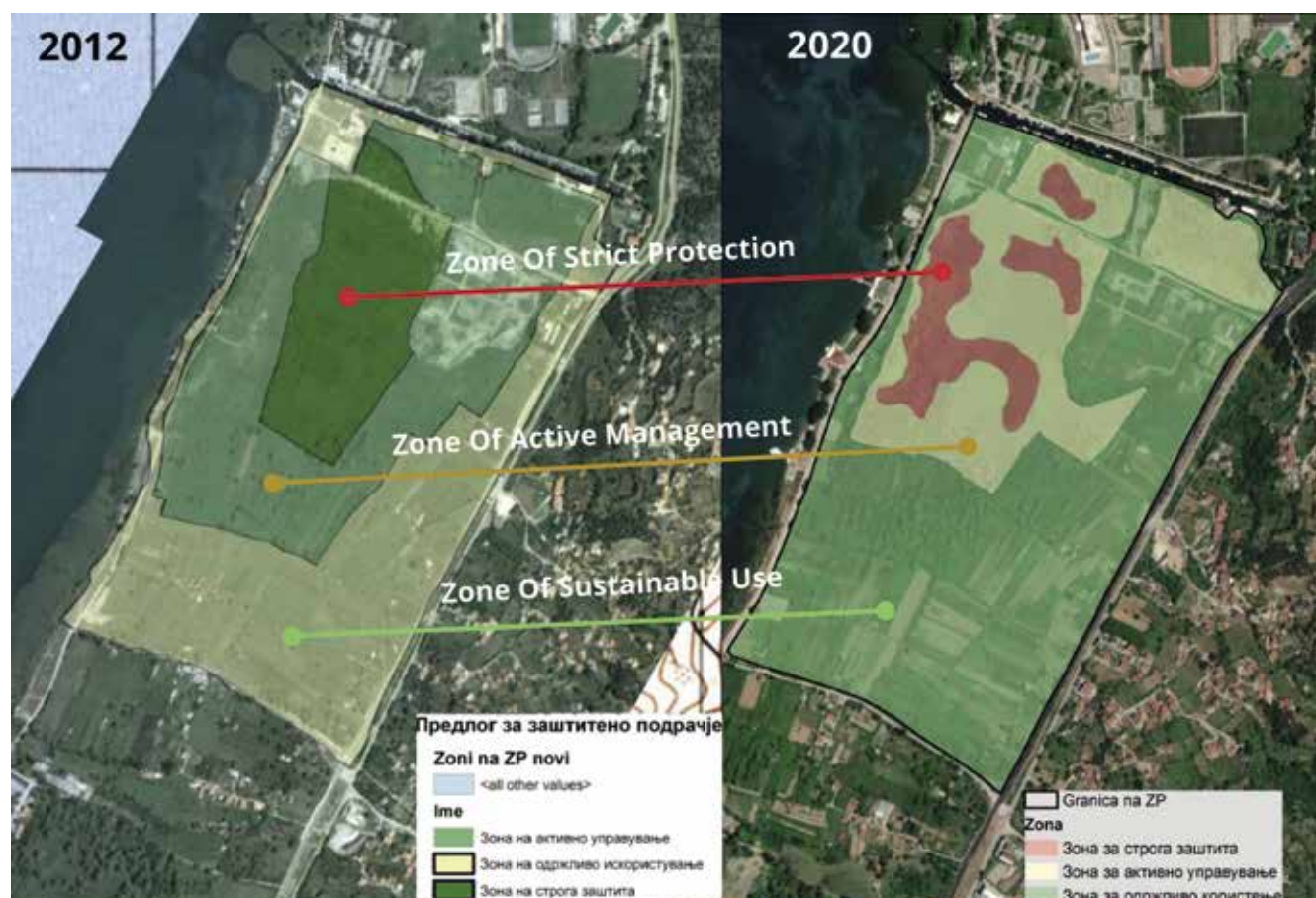


Fig. 12: Although some platform removal has taken place, the iconic Kaneo beach area remains heavily modified with a constructed wall breaking up the lakeshore ecotone.

Source: <https://www.facebook.com/plazakaneo/photos/a.10152925270164405/10157921655474405/>

50m protected green belt zone still happens; and potent symbols of illegality like a lakeshore hotel at Lagadin stand as before among the 11,547 structures recorded by the MPNCHOR 2020/29 as having unresolved legal status in October 2019. New funds have been set aside for more demolitions but the strategy is unclear, and a new draft legalization law looks to extend pathways to legality for outlaw buildings.

### Studenchishte Marsh

Revitalization of wetlands is another tool to insulate Lake Ohrid against the dual pressure of climate change and nutrient inflow. Depressingly, efforts in this direction have the appearance of another sham: Although a 2020 valorisation has been conducted to establish Studenchishte Marsh, Lake Ohrid's last fully functional coastal wetland<sup>27</sup>, as a protected area, the proposal has downgraded previous plans to nominate the location as a Monument of Nature<sup>28</sup>, opting instead for a Nature Park design-

nation<sup>29</sup>, which precludes the need under Macedonian law for a buffer zone<sup>30</sup>.

The valorisation has also shrunk the suggested Zone of Strict Protection to a fragmented 5.33 ha from the unbroken 15.65 ha recommended in 2012; and decided likewise for the Zone of Active Management, whose planned extent is now just 15.08 ha instead of the 20.74 previously envisaged (see Fig. 12). Hence, if designated, just 34 % of the wetland will be ded-



Fig. 13: In 2020, Zones of Strict Protection and Active Management have been reduced to just 34% of the yet-to-be designated Studenchishte Marsh protected area, down from 57% suggested in 2012.

Source: Spirovska et al. (2012) / Ohrid SOS

27 Society of Wetland Scientists (2018) Declaration on the Protection of the Lake Ohrid Ecosystem. Madison, USA.

28 Spirovska et al. (2012) State of the Remains of Studenchishte Marsh and Measures for its Revitalization. DOOEL Dekons Ema Ecological Consulting. Skopje, Republic of Macedonia.

29 Spirovska et al. (2020) Study for the Valorisation of Studenchishte Marsh. DOOEL Dekons Ema Ecological Consulting. Skopje, Republic of Macedonia.

30 Law on Nature Protection for the Republic of Macedonia.



icated to primary objectives, well below the IUCN threshold, and the agricultural, recreational, administrative, and infrastructural threats that have decimated Studenchishte's bird, fish and relict plant populations<sup>31</sup> will be able to continue unabated in the optimistically titled Zone of Sustainable Use, possibly alongside a new-build marina<sup>32</sup>.



Fig. 14: Inauthentic renovation of Bistro Lihnidos in the Old Town Core of Ohrid, involving inappropriate materials, goes against Management Plan regulations for Cultural Heritage Zone 1.

Photo: Le Petit Bistro Lihnidos



Fig. 15: The Natural and Cultural Heritage of the Ohrid Region is still used as a dumpsite at countless locations despite Recommendation 16 of the 2017 Reactive Monitoring Mission. (October 2020.)

Photo: Ohrid SOS

## Institutional cabal

Institutions overseeing the Natural and Cultural Heritage of the Ohrid Region's deterioration are resistant to supervision from citizens. Among many failures, a February 2020 update to the Law on Urban Planning for urban plans to be placed publicly online was not honoured within the stated timeframe; Ohrid Municipality has not supplied planning documents related to the lakeshore village of Lagadin, flying in the face of a court requirement; and Ohrid SOS information requests related to the plan for the removal of illegal constructions have been thwarted. Damningly, Ohrid SOS has not received legally-underpinned invitations to CMNCHOR meetings, despite their importance as a WHS control mechanism.

An official SOS complaint to the State Administrative Inspectorate (SAI), a theoretically neutral body empowered to investigate such matters, has resulted in a one-sided process that effectively reinforced CMNCHOR's ability to prevent citizen oversight; and repeated unfounded accusations that SOS is spreading falsehoods<sup>33</sup>. SOS has since been witness to strong evidence that SAI is advising institutions on how to block information requests.

## Conclusions and Recommendations

The Outstanding Universal Value statement for the Ohrid Region references its provision of "refuge for numerous endemic and relict freshwater species of flora and fauna dating from the tertiary" as well as its "best preserved and most complete ensemble of ancient urban architecture of this part of Europe". Maintenance of these values relies on

- a) formally recognizing the scale of threats by placing the property on the List of World Heritage in Danger;
- b) establishing a buffer zone including Lake Prespa in both Albania and Macedonia with a bilateral committee reporting to the World Heritage Centre twice yearly on measures for Lake Prespa water level/quality amelioration;
- c) aligning zoning with primary management objectives for 75% of a 63.97 ha Studenchishte Marsh protected area in line with IUCN norms;
- d) rewriting and fully adopting a well-designed new law for the Ohrid Region WHS; and
- e) placing a total moratorium on construction at least until a comprehensive, functional wastewater system is in place, and institutions relevant to natural and cultural heritage are dissolved and reformed after a public review by respected international conservation bodies into their structure, staffing, funding, and functioning.

31 Apostolova et al. (2016) Studenchishte Marsh as an Integral Part of Lake Ohrid: Current Status and Need for Protection. *Wetland Science and Practice*, Vol. 33, No. 2.

32 For details, see World Heritage on the Edge III: Another Brick in the Wall (Ohrid SOS, 2020).

33 State Administration Inspectorate (27/3/2020) Information to Activists of the Citizen Initiative Ohrid SOS. Archive number IP. I, Number 09-196.



# Upper Svaneti World Heritage is in Danger

Nato Tsintsabadze, ICOMOS Georgia



Fig. 1: The Upper Svaneti World Heritage Site.

Map: UNESCO / National Geographic / Martin Lenk

"Preserved by its long-lasting geographical isolation, the mountain landscape of the Upper Svaneti region is an exceptional example of mountain scenery with medieval villages and tower houses.

The property occupies the upper reaches of the Inguri River Basin between the Caucasus and Svaneti ranges. It consists of several small villages forming a community that are dominated by the towers and situated on the mountain slopes, with a natural environment of gorges and alpine valleys and a backdrop of snow-covered mountains. The most notable feature of the settlements is the abundance of towers.

The village of Chazhashi in Ushguli community, situated at the confluence of the Inguri and Black Rivers, has preserved more than 200 medieval tower houses, churches and castles. The land use and settlement structure reveal the continued dwelling and building traditions of local Svan people living in harmony with the surrounding natural environment. The origins of Svaneti tower houses go back to prehistory. Its features reflect the traditional economic mode and social organisation of Svan communities. These towers usually have three to five floors, and the thickness of the walls decreases, giving the towers a slender, tapering profile. The houses themselves are usually two-storeyed; the ground floor is a single hall with an open

hearth and accommodation for both people and domestic animals, the latter being separated by a wooden partition, which is often lavishly decorated. A corridor annex helped the thermal insulation of the building. The upper floor was used by the human occupants during summer, and also served as a store for fodder and tools. A door at this level provided access to the tower, which was also connected with the corridor that protected the entrance. The houses were used both as dwellings and as defence posts against the invaders, who plagued the region.

The property is also notable for the monumental and minor arts. The mural paintings are outstanding examples of Renaissance painting in Georgia.<sup>1</sup>



Fig. 2: Chazhashi Village - World Heritage Property, 2017. Photo: Stephan Doempke

## Background brief

This report aims to update information on the state of conservation of the Ushguli Community World Heritage presented for the World Heritage Watch Report by Maqi Kvitsiani (Blue Shield Georgia) in 2017 and on Chazhashi Village and the entire Ushguli Community by Tamar Gelashvili in 2018. In both reports the main threats facing Ushguli's Cultural Heritage were identified as: endangered state of historic urban fabric; inadequate conservation methodology applied during restoration works, uncontrolled new developments within Ushguli and in the immediate environs of the property.

Unfortunately, no positive development is observed since then, and the situation has been aggravated even more. On 25-27.08.2019 experts of ICOMOS Georgia have participated in a field visit organized by the National Agency for Preservation of Cultural Heritage of Georgia (NAPCHG) as a field monitoring mission for an extraordinary council of experts to observe ongoing restoration activities in Chazhashi village as a response to the alarming TV and Heritage Activists' reports concerning the Site. Parts of the restoration works in Chazhashi were carried out by a private construction company based on restoration plans prepared by ICOMOS Georgia in 2016.

On 06.09.2019 ICOMOS Georgia held a working meeting with experts and relevant representatives of the NAPCHG to discuss these issues. Based on the information obtained, a Statement on the State of Conservation of Ushguli's cultural heritage has been elaborated and published by ICOMOS Georgia to warn stakeholders and to attract attention to the situation developed on the World Heritage property of Upper Svaneti (Chazhashi village, Ushguli Community).<sup>2</sup> This statement together with many other reports of heritage activists and concerns declared by NAPCHG received wide media coverage and attention.<sup>3</sup>

Of special concern to the conservation community are the so-called illegal and uncontrolled construction activities developed within the Buffer Zone, in the villages of Chvibiani and Zhibiani of Ushguli Community and in close proximity to Chazhashi Village. A new illegal settlement "Lanjurishi" (named after its location) that has emerged since 2014 to the east of the property, is a threat to the harmonious relation of historic Ushguli with its spectacular environment, and violates the integrity of the property (see Fig.3–6, p. 119).

Restoration works carried out in Chazhashi Village, in many cases, have neglected basic principles of the established restoration plan and proved to be inadequate regarding the building techniques and the use of non-traditional, incompatible build-

2 ICOMOS Georgia Statement on the situation of World Heritage Site - Chazhashi (Ushguli, Upper Svaneti), ICOMOS Georgia, 2019. [https://drive.google.com/file/d/1KcUCkFcwszelsSiMOUBAchuL\\_esXxTZ4/view](https://drive.google.com/file/d/1KcUCkFcwszelsSiMOUBAchuL_esXxTZ4/view)

3 TV show - Real Space - Threats to Svaneti antique towers and churches, 2019. Retrieved from: <https://www.youtube.com/watch?v=M9YRhZvjY6g> Illegal constructions in Ushguli might cause removal of the site from the World Heritage List, Media Centre Mtavari, 2019. <https://mcm.ge/32615/> Due to illegal constructions in Ushguli, the site might be removed from the World Heritage List, Imedi News, 2019. <https://imedinews.ge/ge/kultura/117002/ushgulshi-ukanono-msheneblobebis-gamo-shesadzloa-dzegli-msoplio-memkvidreobis-nuskhidan-amoighon>

Ushguli might be removed from the World Heritage List, Report News Agency, 2019. <https://report.ge/economics/ushguli-shesadzloa-msoflio-memkvidreobis-dzeglita-nuskhidan-amoighon/>

Ushguli's World Heritage in danger (Ushguli, village of Chazhashi, Georgia), Geographien | Doing Geog<<<raphy, 2019. <https://stefan-applis-geographien.com/2019/07/31/ushgulis-world-heritage-in-danger-ushguli-village-of-chazhashi-georgia/>

Request of the Ushguli Community, Georgian Public Broadcaster, 2019. <https://www.youtube.com/watch?v=z6ZYooKSO0Q>

Perspectives | The threats to Georgia's world heritage sites, Eurasianet, 2020. <https://eurasianet.org/perspectives-the-threats-to-georgias-world-heritage-sites>

Svaneti Series | Svaneti as Switzerland of the Caucasus, Geographien | Doing Geography, 2020. <https://stefan-applis-geographien.com/2020/12/27/svaneti-series-svaneti-as-switzerland-of-the-caucasus/?fbclid=IwAR16zIXAI-8bCim0ciqTvm4iQ9-JHjquxm9VeV2nnU94vt534QWNm9HFOFDI>

TV Episode, Mtis Ambebi, 2020. [https://m.facebook.com/story.php?story\\_fbid=1038093803342241&id=118752518609712](https://m.facebook.com/story.php?story_fbid=1038093803342241&id=118752518609712)

Ushguli Call, Radio Tavisupleba, 2020. [https://www.youtube.com/watch?v=Zb0S6\\_9w0sA](https://www.youtube.com/watch?v=Zb0S6_9w0sA)

Georgia's ancient fortress villages: An endangered UNESCO site, Al Jazeera English, 2020. <https://www.youtube.com/watch?v=Ydt1dvnCZ2Y&fbclid=IwAR-0WkhkeK1UYQtu8pK-XVzF-aQvKbv22RrWi9nxfj-tz9yJ1RL67THfAs>

Why may Ushguli lose the Status of World Heritage Site, Mtisambebi, 2021. <https://mtisambebi.ge/news/culture/item/1254-ratom-sheiwleba-dakar-gos-ushgulma-msoplio-memkvidreobis-weglis-statusi>

1 <https://whc.unesco.org/en/list/709>





Fig. 3:

Photo: Vakho Naveliani



Fig. 4

Photo: Lasha Shartava



Fig. 5 and 6: Illegal buildings in Lamjurishi, 2019.

Photos: Lasha Shartava



Fig. 7: Poor restoration of a Machubi house structural framework in Chazhashi, 2019.

Photo: Lasha Shartava

ing materials, such as the use of cement mortar, bitumen membrane on roof, poor quality wooden beams in structural framework, etc. Obvious is the lack of skilled craftsmen involved to arrange traditional stone slates roofs and masonry. Different reasons are claimed to justify breaches in quality – a lack of funding allocated for traditional materials, limited time due to weather conditions, inaccessibility of the proper building material such as timber and stone slates due to environmental restrictions and law, etc. The fact is that the whole process lacked professional conservation supervision and monitoring (Fig. 7,8).





Fig. 8: Poor restoration of Historic building. Use of cement mortar. Chazhashi, 2019.

Photo: Lasha Shartava

Measures undertaken by the NAPCHG to respond to the crisis in Upper Svaneti –

- in 2017, a moratorium on new construction activities within the buffer zone has been adopted by the Government;
  - several cases of illegal constructions have been appealed to the court by the Agency;
  - a claim to the relevant environmental authorities to allow access to traditional building materials (stone slabs and timber) is still in progress;
  - restoration works in Chazhashi have been halted;
  - in 2018 a local conservation unit was created to serve the Chazhashi Museum-Reserve;
  - in 2019 a World Heritage Council with wider representatives of stakeholders has been established;
  - an Urban Regulation Plan for Chazhashi and other villages of Ushguli Community: Zhibiani, Chvibiani, Murkmeli has been commissioned and implemented in 2019, though it still is waiting to be agreed with the World Heritage Committee;
- all these efforts have failed and turned ineffective. These problems are profoundly rooted in the poor and inadequate management system of the cultural heritage sector in Georgia, and respectively this is the main dilemma also of Upper Svaneti.

### Conservation and Management

No Conservation or Management plan of the property is in place. A Conservation Plan was elaborated only for Chazhashi in 2000, which has never been utilized and already is outdated. It is necessary to elaborate conservation plans for other villages of the Ushguli community as well. Designation of only Chazhashi village as World Heritage Property is somewhat conditional as it is an inseparable part of the Ushguli community, and its OUV exists only in relation with other villages representing important attributes contributing to the authenticity and integrity of the property. Therefore, conservation principles need to be applied to them in the same way as for the World Heritage Property. In

this regard, we believe that the existing buffer zone of the site is inadequate to maintain the property's Outstanding Universal Value and therefore should be subject to revision.



Fig. 9: Chazhashi against the background of the illegal settlement of Lamjuri-shi.

Photo: Stephan Doempke

There is no everyday management process in situ in Ushguli. The newly established local conservation unit has no resources, neither financial nor professional. No specific training was provided for its only officer. No capacity building programme or strategy for local craftsmen or consistent public awareness programme for local community exists. It is urgent to strengthen local institutions and to equip them with relevant skills, measures and tools.

Coordination and collaboration between local, regional and central bodies involved in the management of the property is extremely weak. There is only one player, NAPCHG, trying to handle and manage the process from Tbilisi, which is not feasible. Media coverage of the issue often report alarming statements of local or related sector authority representatives proving their unawareness of the OUV of the World Heritage Property and of their responsibility to manage and preserve values of the Site.

Following the Ushguli media publicity in 2019, the Municipal Development Fund of Georgia (under the Ministry of Regional Development and Infrastructure of Georgia) funded the preparation of a project proposal for the reconstruction of 14 towers in the Ushguli community in 2020. The methodology and conservation principles of the proposed plan were even worse than works halted in 2019, and the World Heritage Council of Georgia rejected it.

The rehabilitation of the Ushguli - Mestia road has been implemented without a Heritage Impact Assessment, and resulted in the destruction of the "Davava Nagmaal" rock associated with important intangible heritage of the Svan Culture (Legend of Lamaria and Giant) as local anthropologists claim. There is no coordination between the administrative authorities and the

tourism industry, resulting in uncontrolled mass tourism development damaging the site.

The last Periodic Report by the State Party was submitted to the WH Committee in 2014.<sup>4</sup> This report already reflects all the above-mentioned obstacles of the site management, and more.

### A Response is urgent

It is pressing to proceed towards the formation of a feasible management system through the implementation of pilot programmes covering issues relating to site management. It has to be a process based on creating practices of involving and empowering the local community in all aspects of site conservation and management, rather than a ready document written outside the site to be implemented.

No World Heritage Centre advisory or monitoring mission has taken place to Upper Svaneti since its inscription in the WH List. As a result, no evaluation and recommendation from the Advisory Bodies is available for the State Party. Upon request of NAPCHG, a UNESCO monitoring mission was planned in 2020, but the COVID-19 pandemic situation made it impossible. Meanwhile, International intervention may evoke the mobilization of the State Party's official bodies on the central, regional and local levels for more serious and dedicated efforts to safeguard Upper Svaneti. International collaboration could provide the possibility to share experience and good practices from different cultures of similar cultural landscapes. The inscription of Upper Svaneti in the List of World Heritage in Danger would provoke not only the activation of local stakeholders but would also attract international attention and technical assistance.

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<sup>4</sup> Periodic report on Upper Svaneti, 2014. <https://whc.unesco.org/en/list/709/documents/>

# Siwa Oasis: a Forgotten Heritage Under Threat

Insaf Ben Othmane Hamrouni, Æcumene Studio

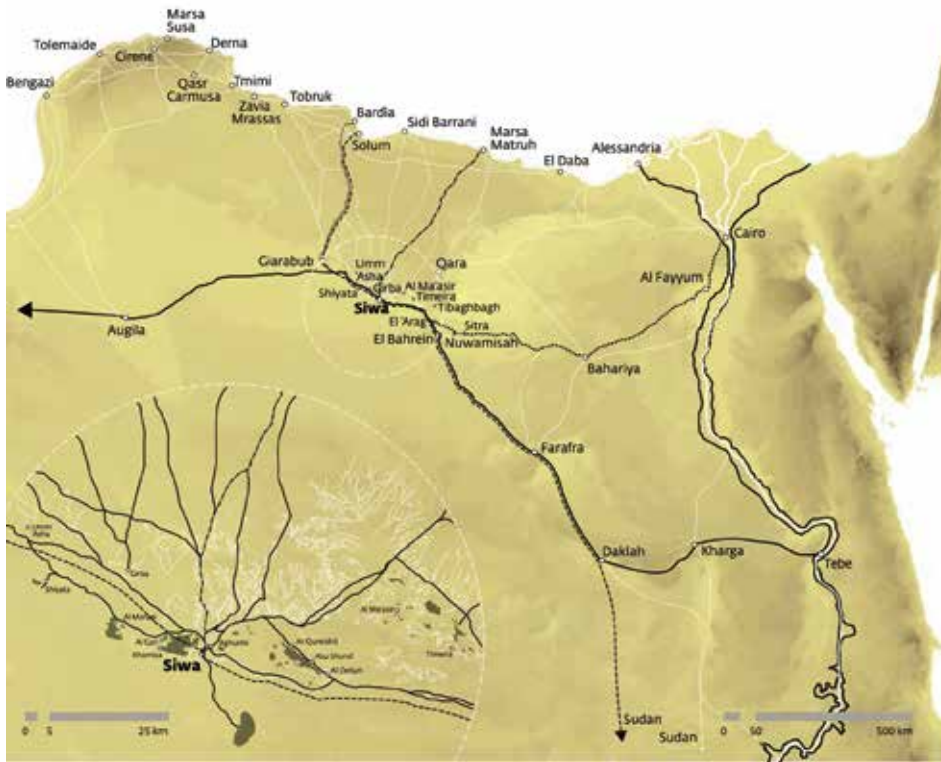


Fig. 1: Siwa Location Map.

Source: Petruccioli, A., & Montalbano, C. (2011). Siwa Oasis, Actions for a Sustainable-Development. Tipografia Grafica & Stampa (ICAR): Bari.

Siwa has been inhabited since antiquity as attested by numerous remains dating from the old kingdom of ancient Egypt. During the medieval period, this ancient city suffered greatly from attacks by Berbers and Bedouins. A new fortified village, which would become Siwa, was built at the start of the 13th century, still known today as “Shâlî”. The term “Shâlî” had the meaning of “city” in the Berber language of Tasiwit but has now become a proper name.

The oasis was one of the most important commercial hubs in the ancient world. Siwa has witnessed a significant interchange of human values from the prehistoric era to the modern period in the developments in architecture, urban development and spatial transformation.

The Siwa Oasis is one of the emblematic centres of Berber culture, situated in western Egypt at the junction of long trade routes crossing the African desert. The oasis is 18m below sea level, containing more than 300 springs and torrents of pure and fresh water that offer the best conditions for a flourishing industry based on dates and olives as well as water-based products. Siwa is known for its unique cultural, environmental and architectural heritage.

Many mummies have been discovered especially in three monumental hills: Gebel al Mawta (the Mountain of the Dead) where three Egyptian tombs are presented together with a Roman necropolis featuring dozens of rock-cut tombs; Aghurmi with the ruins of the oracle temple of Amun “Ubaydah”, dating back to the 3rd Intermediate Period; and the Shali fortified city which was built on the highest hill of the oasis in order to defend it against tribal attacks.

The Siwans used to build their dwellings in total integration with their natural environment, using an elaborated earthen construction technique, blending with its natural environment from which it has drawn its substances: soil, stones, salt, water, wood and leaves. The oasis has been known worldwide by the Karsheef block: a mixture of mud, salt and minerals that proved its good structural characteristics and its high thermal insulation



Fig. 2: The Siwa Natural-Cultural Landscape. View from the Oracle temple of God Amun “Ubaydah”.

Photo: Authors, 2017



under the extreme climatic conditions of the desert, ranging from 5°C in winter to 39°C in summer, despite its high vulnerability to water and humidity (see Fig. 3).



Fig. 3: Traditional Siwa Karsheef House (an Extension of an Old Siwan House, Heritage Museum - Centre of Documentation for Cultural and Natural Heritage (CULT-NAT) – Bibliotheca Alexandrina).

Photo: Authors, 2017

The inhabitants of Siwa are profoundly attached to their traditions and customs. Until today, they have been preserving their local rituals of celebration like burial and marriage ceremonies, as well as a very sophisticated art of embroidering clothes and ornamental crafts. Siwa's architectural heritage however, bearing a unique testimony of cultural vernacular construction techniques, is disappearing due to globalization and modernization.

Siwa is currently undergoing rapid changes as a response to its economic and demographic boom and the evolving needs of its population of 20,000 inhabitants who, despite their attachment to their identity and local heritage, are influenced by the pace and specifics of modern life. Local construction materials and techniques are discarded for skeletal residence of reinforced concrete and baked bricks leading to the decline in quality of the indoor and outdoor environment, the loss of aesthetics, the emergence of an uncategorized building typology, informal urbanization and the pollution of the natural environment (see Fig. 4, next page).

Several efforts were made to preserve Siwa's heritage and develop its built environment through a series of national and international projects and initiatives while developing a new vision for its future and its youth community. Nevertheless, there are many governmental institutions managing the Siwa oasis's authentic resources through different, not well coordinated approaches and agendas, hindering these efforts. For more than 70 years the oasis was subject of research studies, restoration and preservation projects under the umbrella of sustainable development programs as well as a place of opportunities for a wide range of national and international organizations that have created an income-generating source for the Siwan community.

Siwa suffers from human-induced impacts, namely: pressure from mass tourism and its facilities, informal urbanization, overlapping development projects, the lack of maintenance and conservation, and massive industrialization. According to arti-

cles no. 2, 3 and 6 of the Mexico Charter on Built Vernacular Heritage (1999), the National Organization for Urban Harmony prioritizes centralized legislative and administrative procedures without considering the new context, transformations and actual socio-economic needs of the Siwa community especially those who live near the core zone of the heritage sites.

### Siwa's protected cultural and natural heritage

In 1994, the "Siwa Archaeological Area" was inscribed by the Egyptian Antiquities Organization in the tentative list for UNESCO WH. The nomination includes nine individual archaeological monuments, protected and managed by the Ministry of Antiquities and Tourism, in a core zone including most of Siwa's urban space, and a buffer zone extending into its natural environment, such as the Siwa Lake, Siwa Oasis and the Great Sand Sea, which is protected and managed by the Ministry of Environment as well as other governmental bodies. However, its core and buffer zones are not clearly defined (see Fig. 5, page 125).

There is also the "Siwa Protected Area", established in 2002 and managed by the Egyptian Environmental Affairs Agency (EEAA). It covers 7,800 km<sup>2</sup> in three separate areas extending from the Libyan border in the west to the Qattara Depression in the east, and from the Diffa Plateau in the north to the Great Sand Sea in the south (see Fig. 6, page 125): Its natural values include springs, small lakes and wetlands, home for endangered species and vegetations. The area also includes Qara oasis and other Berber settlements. It is listed as an IUCN Category VI "Protected Area with Sustainable Use of Natural Resources", generally a large area mostly in a natural condition, where a proportion is under sustainable natural resource management and where low-level non-industrial use of natural resources compatible with nature conservation is seen as one of the main aims of the area.

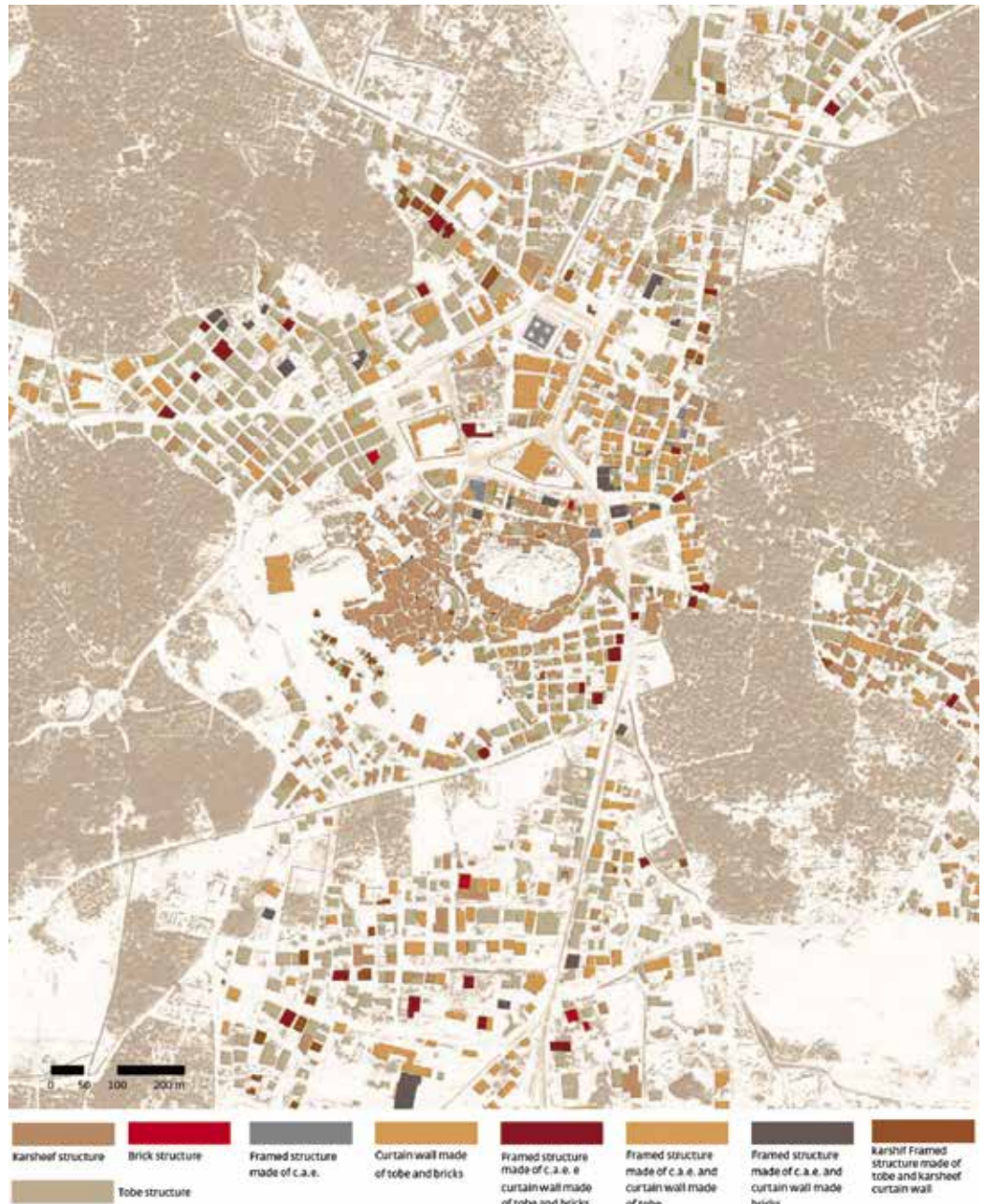
These two institutional complexes are managed in isolation from each other but more importantly, in isolation from the local Berber population, and ignoring that they are part of a coherent cultural landscape, all bound together by a living traditional culture, with their productive, existential relationship giving them a heritage value. It is the manifestation of the osmosis between the nomad and sedentary life of the Berber people and their natural environment. This area could not be separated from the urban boundaries of Siwa as it is a continuity of the land of Siwans and Berbers.

### SIWI Initiative: contribution towards a solution

The government's heritage management of the Siwa cultural landscape follows a centralized stewardship approach (Top-

Fig. 4: Siwa Oasis under Rapid Urbanization.

Map adapted from: Petruccioli, A., & Montalbano, C. (2011). Siwa Oasis, Actions for a Sustainable Development. Tipografia Grafica & Stampa (ICAR): Bari



## Tourism Development

A survey<sup>2</sup>, in Siwa Oasis, conducted between September 2017 and March 2018 found that

- There are some archaeological attributes not known for Siwa visitors.
- SDGs are not considered within the protection strategies of archaeological sites and the transfer of heritage knowledge to the future generations.
- The local community doesn't have high awareness of the cultural touristic aspect of Siwa oasis.
- There is no clear, well defined management plan of the heritage sites (cultural and natural) in Siwa Oasis and the public touristic services and facilities.
- Regarding Ecotourism, only a small number of ecolodges are offered.
- The local community is very attached to its intangible cultural heritage, but is not aware of the importance of the archaeological, architectural and natural heritage.
- They don't effectively engage the tourism development process in Siwa.
- The educational level of the local community is not adequate to the future requirements of the cultural tourism market.

1 Abnaa Siwa, Siwa Community Development and Environment Conservation (SCDEC), Siwa City Council, Faculty of Fine Arts - Architecture Department, Alexandria University (Dr. Hatem El Tawil and Dr. Heba Aboufadi and Dr. Hadeel Regal), and experts like Eng. Hany Anwar, a civil engineer specialist in restoration of old and heritage buildings and private architecture and engineering studio, HANDOVER and ARTINN.

2 Tawfik, M. I & Wahdan, S. H. (2020), Proposed Development Strategy for Conserving the Archaeological Heritage and Hospitality in Siwa Oasis. Castle Journal, 4 June 2020. Retrieved 12 January 2021 from <https://bit.ly/3si3Zud>



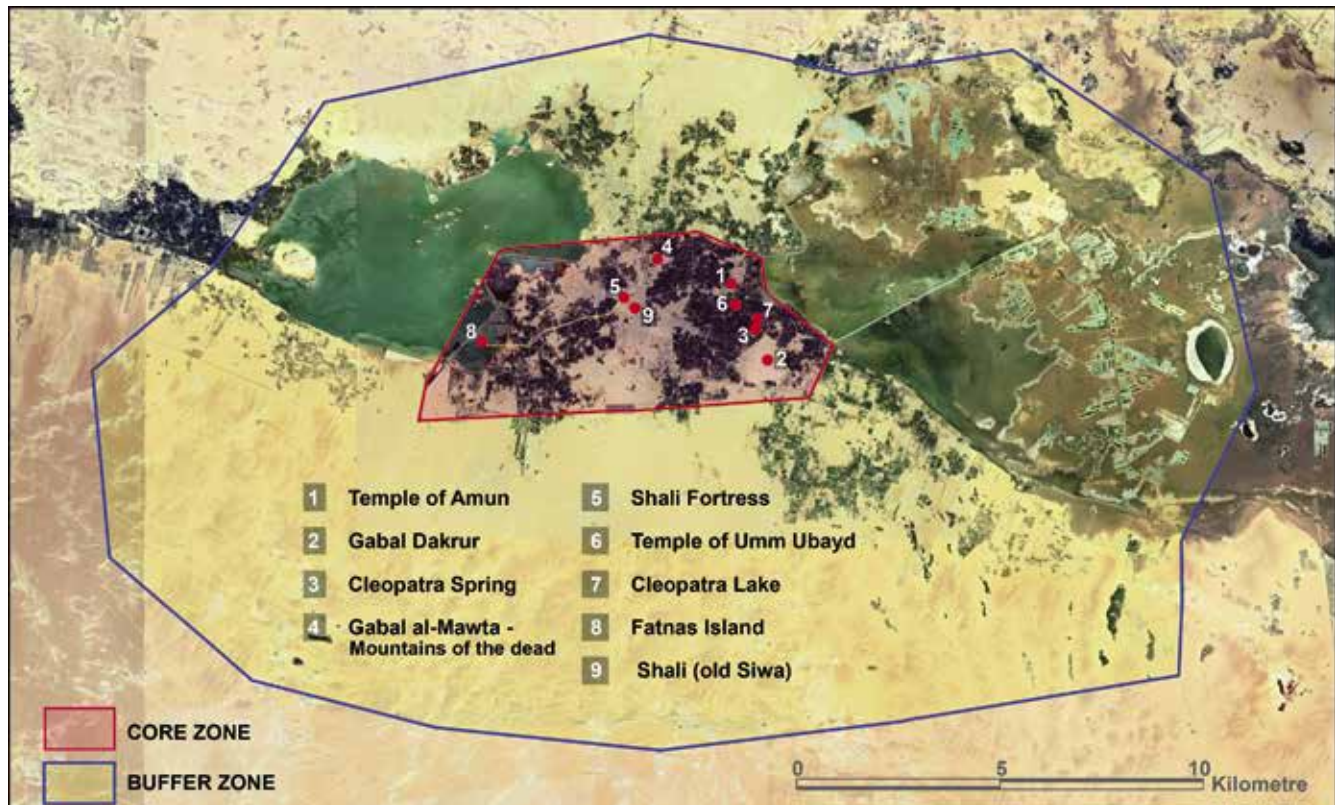


Fig. 5: The Egyptian Tentative UNESCO WHS "Siwa Archaeological Area".

Map adapted from the nomination file of the Egyptian Antiquities Organization (1994)

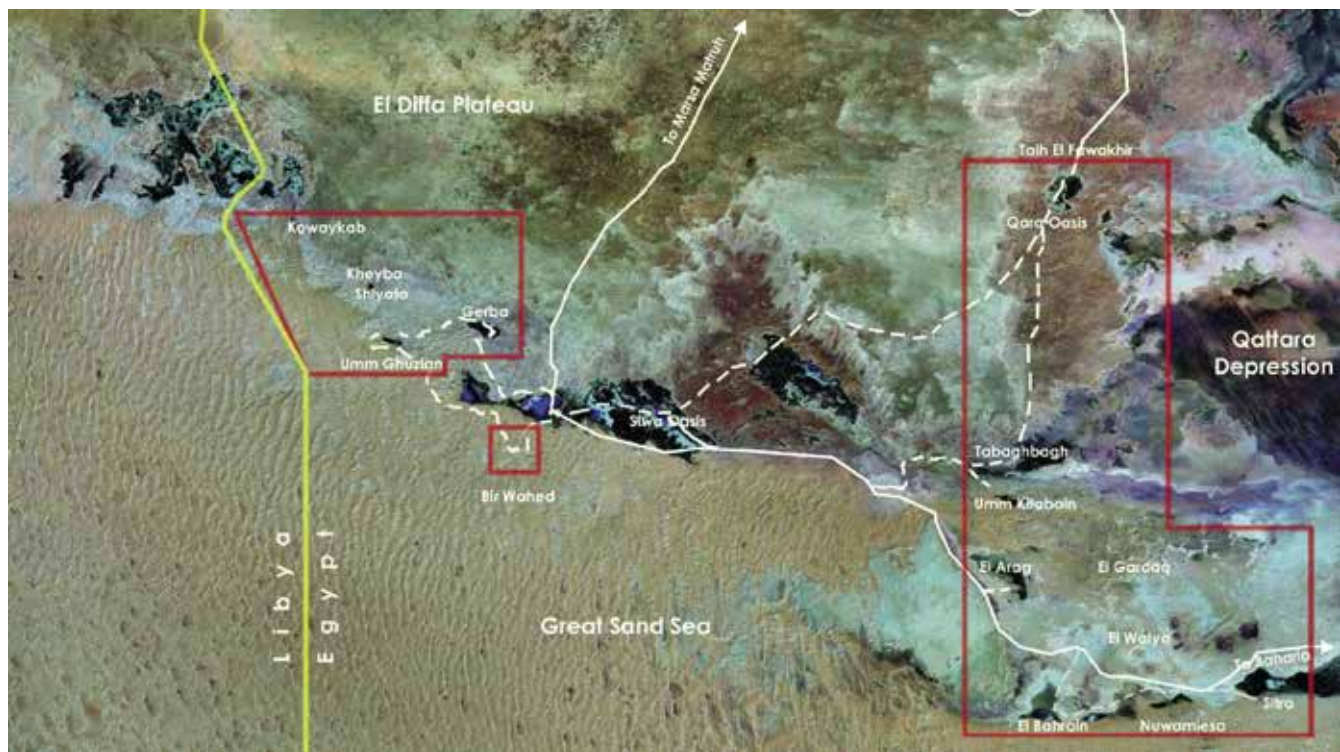


Fig. 6: The Siwa Protected Area.

Map: IUCN – Centre for Mediterranean Cooperation, Egyptian Environmental Affairs Agency & Matrouh Governorate (2007), Sustainable Tourism in Siwa: an Integrated Strategy for the Siwa Protected Area. Retrieved 12 January 2021 from <https://bit.ly/35NPHYL>

## Recommendations – Perspectives

1. There is a need for a paradigm shift towards a more multidisciplinary conservation strategy for the Siwa Oasis, taking into consideration the tangible and the intangible heritage. Due to the strong interrelatedness of Siwa's heritage of archaeology, architecture, land-use and customary practices which

cannot be appreciated, protected and managed in isolation from each other, we suggest to nominate the Siwa Oasis under criteria (i), (ii), (iv) and (v), with a strong focus on the cultural landscape aspect forming a coherent unit where all elements have meaning and function, and acknowledging local perceptions of their heritage as an indivisible whole.





Fig. 7: Shali Fortified City, facing pressure from touristic facilities. Photo: Authors, 2017

As a natural-cultural landscape, we propose a core of Siwa based on the Siwa protected area boundaries and buffer zone including the surrounding of the core areas where nature is conserved alongside mapping of Berber language: Amazigh spoken areas as it is the root and the backbone of cultural identity identified with the boundaries of al-Jaghbūb Oasis in Libya; its population is Berber. The results are highlighted in the map below and verified through desktop research.

3. In view of the UNESCO WH nomination process, we suggest creating a “Siwa Corporate Entity” acting as an effective sustainable development platform that will exclusively be responsible for managing and coordinating the different projects and resources with all different stakeholders, and to ensure coherence and transparency with the government planning agendas for the oasis and a source of information and data focusing on the whole territory of the future World Heritage. We recommend seven fields of work, to be implemented in cooperation of the Ministry of Antiquities and Tourism, Ministry of Culture, Ministry of the Environment, Ministry of Defense, Ministry of Foreign Affairs, Matrouh Governorate, Universities and Research Centers, Cultural and Community Development NGOs, and local entrepreneurs and external investors: 1. Documentation and Research 2. Develop a Comparative Analysis with other WH sites such as the Old Town of Ghadames (Libya) 3. Statement of Significance 4. Defining the site attributes (to assess the damages, deteriorations as well as buildings’ material-based conservation processes) 5. Assessing Authenticity and Integrity 6. Defining Appropriate Boundaries 7. Develop sustainable cultural tourism.

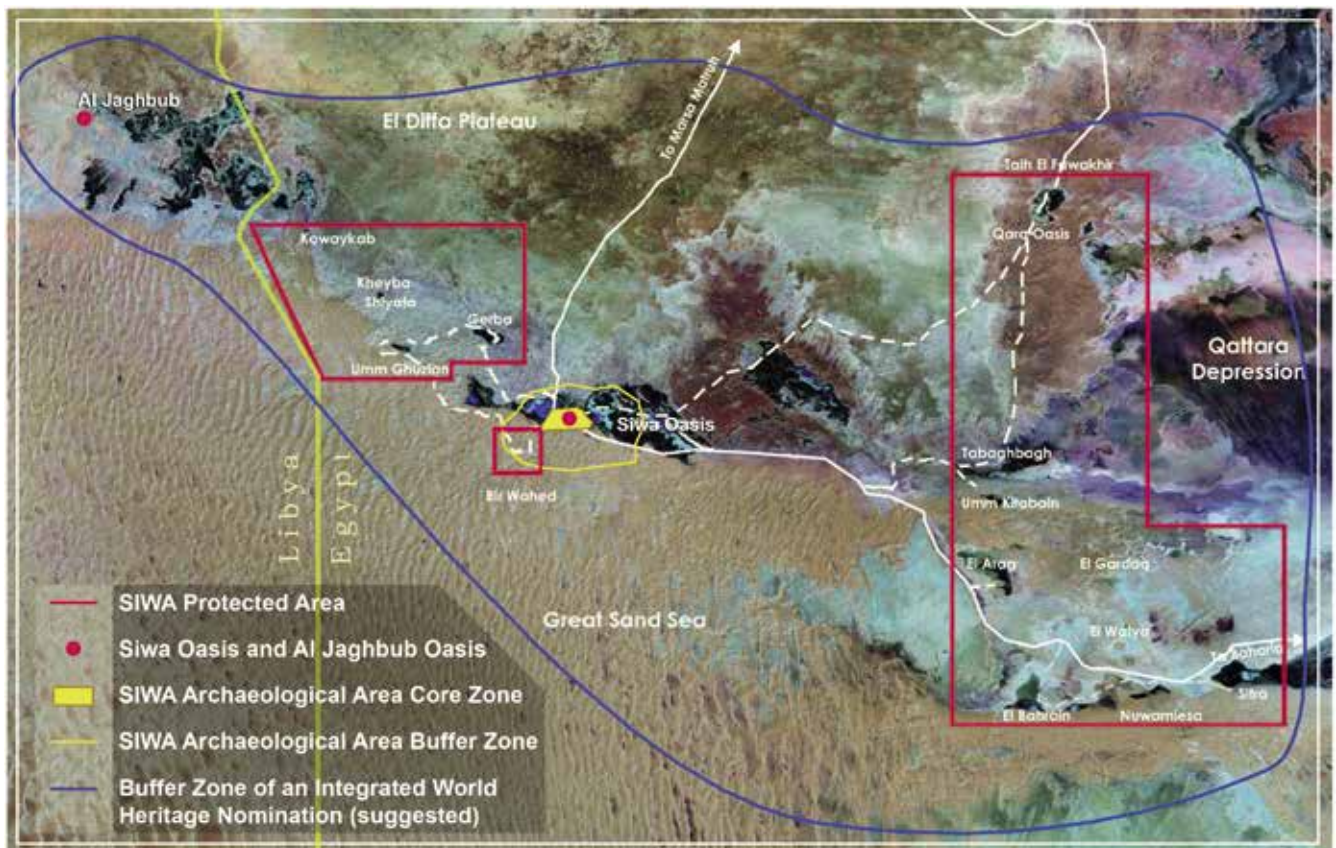


Fig. 8: Tentative Suggestion for Core and Buffer Zone of SIWA based on Figs 4 – 6.

Map: Authors, 2021

2. There is a huge lack of research concerning the emerging trends and their impacts on the oasis and its surroundings. The faced threats are not well addressed in the literature or analyzed, and they need to be updated. Recently the Egyptian President announced that Siwa Oasis will be developed to be one of the best tourist destinations in the country, which will put the oasis more exposed to overexploitation, and social and environmental degradation.

# The Ahwar of Iraq: Persisting Threats and Paths to Protection

Toon Bijmens and Salman Khairalla, Save the Tigris Campaign

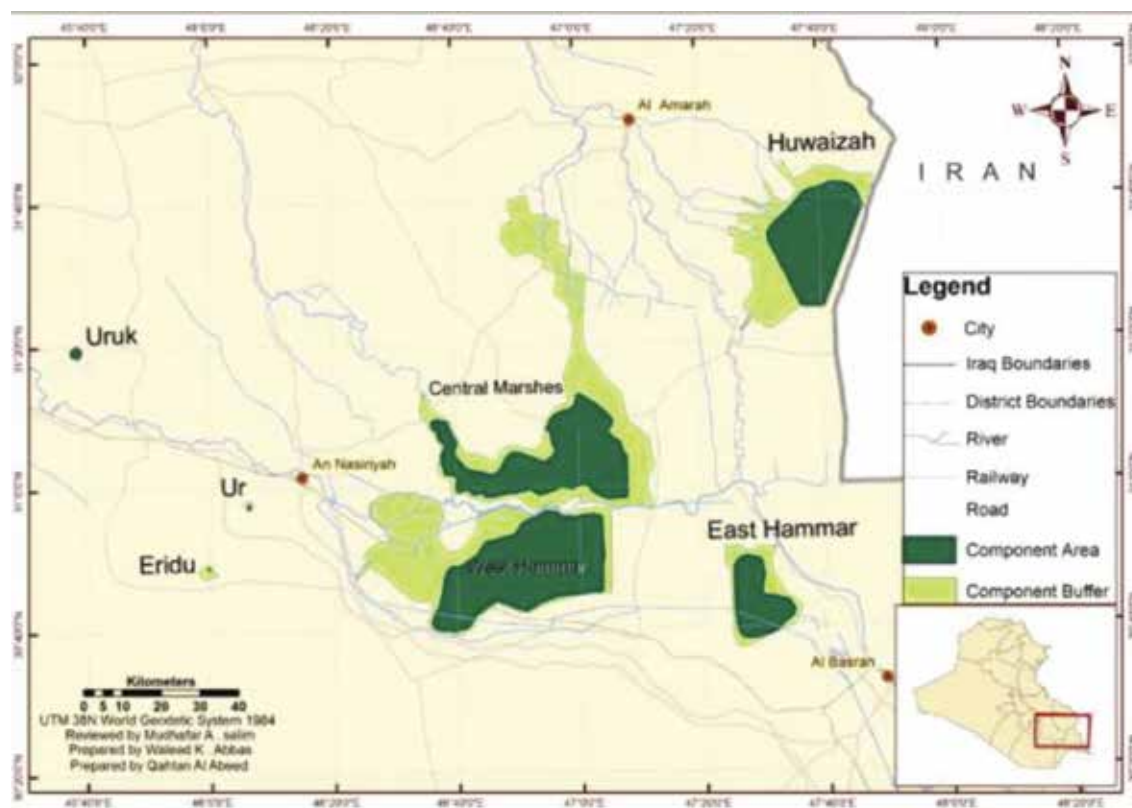


Fig. 1: The Ahwar of Iraq World Heritage Site.

Map: UNESCO

The Ahwar lie in Southern Iraq: A world heritage site consisting of 3 archaeological sites and 4 wetland marsh areas (Fig. 1). The remains of the ancient Sumerian cities of Ur, Uruk and Tell Eridu form the archeological component, dating back to 3000 B.C., while the Iraqi marshlands form one of the largest wetlands in Asia. The Ahwar were registered in the UNESCO World Heritage List in 2016, through Decision 40COM 8B.16.<sup>1</sup> Since then, annually the advisory bodies ICOMOS<sup>2</sup> (cultural heritage) and IUCN<sup>3</sup> (natural heritage) submitted their recommendations to the World Heritage Committee regarding the protection of the site. In recent years, protection of the site has not vastly increased, while serious threats to the site continue to persist. The management of the Ahwar remains a large concern for civil

society. This paper will detail some of those concerns, referring to the State of Conservation Report as submitted on 28 January 2020 by the Permanent Delegation of Iraq to UNESCO.

## Natural Sites

The World Heritage Committee reiterates its request that the State Party of Iraq “provides the natural components of the property with adequate water within its national capacity as a matter of utmost priority”. According to data of the Iraqi Government, in 2017 and 2018, the minimum water flows needed to sustain the Iraqi Marshes were not met, while in 2019, the water inflow for the Marshes was 112% higher than the minimum amount required. The State of Conservation Report does not mention any outlook for the next year(s) or demonstrated measures to ensure sustainable flows to the Marshes in the future, even though in the earlier 2018 Decision 42COM7B.66

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

<sup>2</sup> [whc.unesco.org/document/152768](http://whc.unesco.org/document/152768)

<sup>3</sup> [whc.unesco.org/document/152770](http://whc.unesco.org/document/152770)



the WHC requested the State Party of Iraq to “demonstrate that these water flows are being provided.” The State of Conservation Report attributes the lack of water flows from 2017–18 to climate change and decreased water flows upstream.

These issues did not end in 2019. Rather, climate change asserted itself in 2019 as climate stress becomes increasingly common, while upstream neighbours continue to build water infrastructure heedless of the impacts these projects are having. In

Climate adaptation should be an integral part of the Ahwar water management policy. In addition, the inflow of rivers originating from outside of Iraq will continue to decrease within the next decade. It is a positive development that in 2019 and 2020 buffalo breeders have returned to the Ahwar and biodiversity flourished, but the challenge will be to maintain such stability. This requires a long-term strategy. The State Party of Iraq should therefore demonstrate measurements taken to ensure sustainable water flows to the Ahwar for the next years.



Fig. 2: Buffalo breeder in the Ahwar of Iraq.

Photo: Jasim Al-Asady

2019, Iraq had not seen as much precipitation since 1988, according to the Iraqi Ministry of Water Resources, while the water levels in the Marshes in 2020 were the highest since 2009. However, water levels fluctuate and climate change becomes increasingly unpredictable, which may lead to both droughts and floods as we move towards extreme weather phenomena.

Turkey last year started filling the reservoir of Ilisu Dam. Further dams are planned as part of the GAP project. In addition, Iran has planned the construction of 13 dams on the Sirwan/Diyala river within the Tropical Water Project. The Sirwan/Diyala river forms a tributary of the Tigris, which feeds the Iraqi Marshes. Negotiations between Turkey and Iraq over water shares have stalled, and it is unclear if and when these would commence again. Meanwhile, the Kurdistan Region of Iraq continues its dam-building spree, while the Iraqi Ministry of Water Resources have stated that they aim to build Makhul, a dam 80 kilometers South of Mosul, to store water. Turkey and Iraq should explicitly incorporate the minimum required flows for the Ahwar in the regulation of dams on rivers that feed the property, in order to preserve the Outstanding Universal Value of the Ahwar. The State Party of Iraq should undertake a Strategic Environmental Assessment of existing and proposed dams on the Tigris-Euphrates Rivers and their tributaries (Fig. 3), with a specific mandate of assessing future impact on flows to the Ahwar.



Fig. 3: Dams in the Tigris-Euphrates River Basin.

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

The Marshes are currently at 86% of their original size. Some policymakers prefer to allocate less water to the marshlands. In particular the areas surrounding the Marshes are at the risk of being drained for oil exploitation. The State of Conservation Report mentions no oil activities have taken place in the vicinity of the property due to weather conditions, but offers no guarantees that this will not be the case in the future. It is important that UNESCO requests the State Party of Iraq to clarify its intentions regarding oil development within or in the vicinity of the site. Is it willing to install a moratorium on oil exploration and extraction? If not, which specific areas within or in the vicinity of the site would be subjected to such kind of activities? Additionally, UNESCO should clarify whether oil developments could jeopardize the World Heritage designation of the Ahwar.

The World Heritage Committee has requested Iraq to submit data concerning illegal bird hunting and overfishing, including the number of prosecutions and convictions from these illegal activities. It requested Iraq to further strengthen its legal protection, enforcement and management capacity to control these activities. UNESCO should request data from the State Party of Iraq on an annual basis, to assess which species are most affected each year. This could be done with the support of IUCN. We would like to request UNESCO to stress sensitization of local population on sustainable use of ecosystem services, and the harmful effects of illegal fishing methods (poison or electricity are still common) and off-season hunting. This could be established through community-based hunting plans which can act as a regulatory mechanism for hunting by community groups, local fishing societies or individuals.

### Cultural sites

The World Heritage Committee requested the Iraqi State Party to complete a survey all the 3 cultural sites as a baseline for future work. Further scientific research needs to be published on the archaeological sites. These include installing educational panels on the sites, provide online details and information, and publish an updated archaeological survey of the cultural sites (the last complete archaeological survey dates back to the 1930s). The development of conservation plans is considered to be a priority for the World Heritage Committee. Parts of the cultural property face instability and weathering. Ruins that were uncovered in the 1920s and 30s have almost all deteriorated or are in such a state of erosion that they have lost their scientific importance, especially those that have not been restored.

Deterioration rates of exposed ruins are only accelerating as they lie susceptible to uncontrolled visitor pedestrian traffic (see Fig. 4). In the component of Ur, the Dig Diga area still contains archaeological remains but is not fenced. Measures have to be taken to ensure tourism does not damage the site. Tourism needs to be regulated, with sustainable infrastructure and facilities. The walkway of the site needs to be renovated and



Fig. 4: Uncontrolled visitor traffic at the Ur Ziqqurat.

Photo: Toon Bijens



Fig. 5: Makeshift walkway at the Ur Ziqqurat.

Photo: Toon Bijens

updated (see Fig. 5). Visitation is further complicated by the fact that there is no water or sanitation provided in the area. Visitor hours are from 8am to 3pm only, though for half of the year people prefer to visit in the evening due to the heat, while tickets have to be purchased 17 kilometers from the actual site. The legal designation of certain parts of the site needs to be clarified. For some outer areas of the Ur Component it is not clear whether they are under the authority of the Dhi Qar Governorate or the State Board of Antiquities.

The Ahwar of Iraq are in need of a comprehensive sustainable management plan which encompasses all the components of the site. The local community of Dhi Qar must feel ownership of the development of the Ahwar. This can be provided by vocational training on the application of the traditional knowledge for livelihoods, which would benefit the local communities of the areas. Communities need training in order to gain new skills for employability or to employ existing capacities. It can enable workers to found small cooperatives and lead their path to economic and personal development. Women in particular need support to maintain their traditional knowledge and to earn a living. Any development should be ecological in nature.



# The State of the Sacred Conservation Zone of the Vat Phou Cultural Landscape, Laos

Martin Lenk, Consultant on Nature Conservation



Fig. 1: Main buildings of the Vat Phou temple complex.

Photo: Martin Lenk

Based on the Shiva cult prevailing at the time of the first construction of Vat Phou in the 5th Century, the characteristics of Mount Phou Kao (symbol of the *lingam*), called *Lingaparvata* in Khmer language, and the sacred spring were decisive for the choice of location for the religious complex. Phou Kao “(a) imparts a lofty visual and physical aloofness or, we can say, a religious sanctity to the *linga parvata* on the mountain top, and (b) functions to fuse nature and religious cultural practices, as the environment for activities such as sacrificial offerings, solitary meditation, and as the source of medicinal (god-given) plants to form healing elixirs (*soma*)” (Engelhardt, 2021). The mountain itself also served as a quarry for some of the building material (Davenport, 2021).

However, archaeological exploration of the Vat Phou Khmer Hindu complex and its adjacent mountain, once connected to Angkor Wat (Cambodia) by an over 200km long ancient royal road, remains far from complete, limiting our full understanding of their interrelatedness. These were the main reasons why the “Sacred environmental conservation zone” (Zone 2) was established as an incremental component of the WH property. This zone adds a nature conservation dimension to the cultural landscape: in **Zone 2, nature is protected for its cultural value.**

Since the report of the latest UNESCO/ICOMOS Joint Reactive Monitoring Mission (2015) does not mention any specific challenges related to Zone 2, this paper was compiled to fill that gap.



Fig. 2: Panoramic view from the summit of Mount Phou Kao.

Photo: Martin Lenk

## The Sacred Mount – a 10.000 ha environment conservation zone

The museum of Vat Phou offers one of the best museal interpretations in Laos. The Champasak landscape is well illustrated with thematic maps and visitors are easily impressed by the enormous size of the “Sacred Environment Conservation Zone”

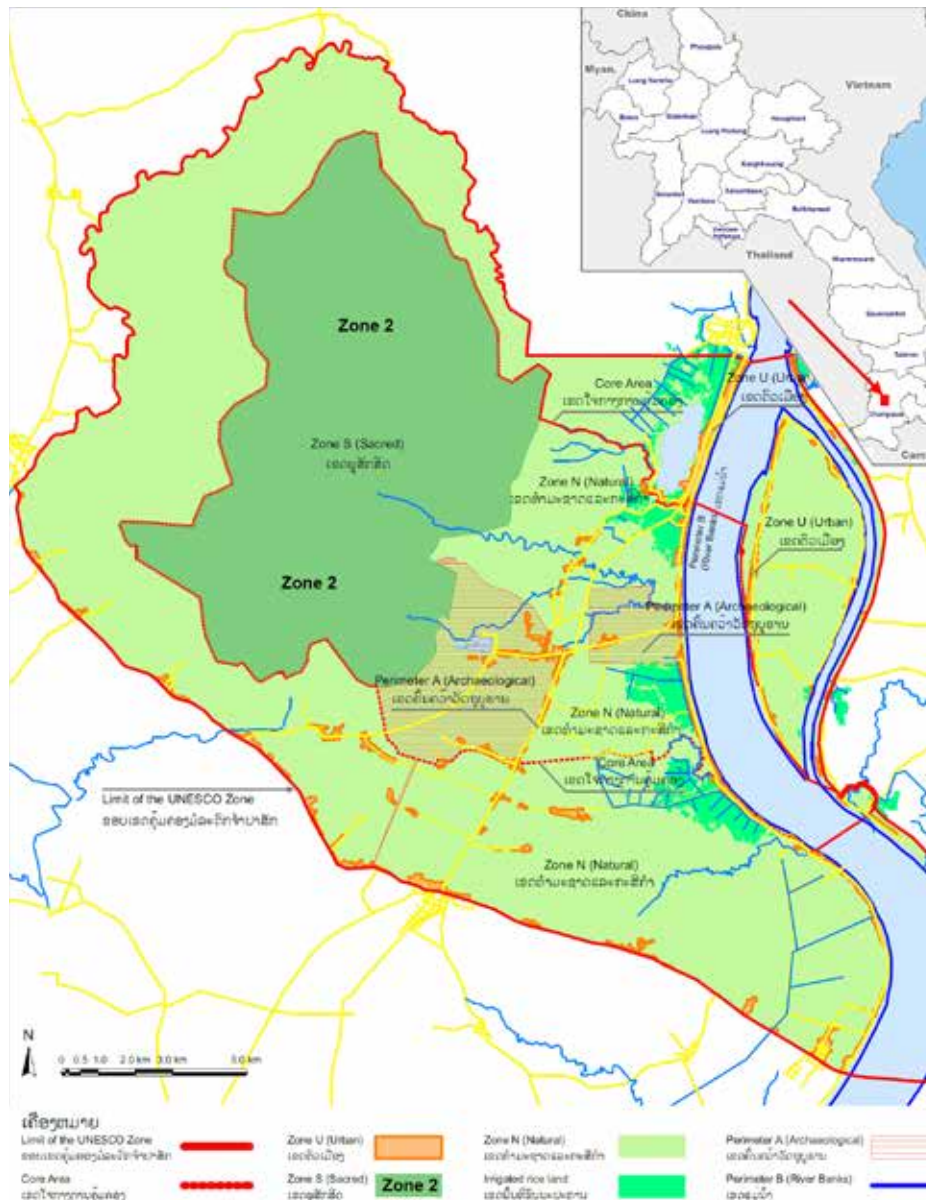


Fig. 3: Zoning Map of the Vat Phou Champasak World Heritage Site

Source: LAO PDR Report 2020, p. 13

extending on 10.000 hectares, or 59% of the core area of the WH property. Thus, within the core area of the WH, there is a natural area that is many times larger than some of the Natural WH properties elsewhere. While the surrounding Mekong Plain is at about 105–125m above sea level (asl), the 50km long boundary of Zone 2 mostly fluctuates at 180-275m asl, leaving part of the foot hills outside, likely in agreement with the adjacent villagers in order to maintain their traditional livelihoods. For today's spiritual practices of the local population, the historical ceremonial significance of the sacred mount seems largely irrelevant.

The justification for the inscription emphasises the outstanding universal value of the natural elements within the setting of the cultural landscape for both criteria iv and vi: **“Criterion iv:** The Vat Phou complex is an outstanding example of the integration of a symbolic landscape of great spiritual significance to its

natural surroundings. **Criterion vi:** Contrived to express the Hindu version of the relationship between nature and humanity, Vat Phou exhibits a remarkable complex of monuments and other structures over an extensive area between river and mountain...”<sup>1</sup>

In the obvious reading, the integrity of the overall property is closely tied to the integrity of the “nature / natural surroundings”. This is what the management has to be aligned with.

### The Champasak Master Plan

The Champasak Cultural Landscape Master Plan of 2016 (MP) aimed to strengthen protection and enhancement of the WH site, evaluating the level of integrity of the different elements. Only Zone 2 receives the highest ranked level 1 on the five-grade rating scale (MP, 2016, p.34). The Master Plan defines Zone 2 (“constituent natural elements of the associative natural landscape”) to be a part of the “core area” (MP, 2016, p.60). The Plan emphasises urban planning, but does not identify management issues related to Zone 2, nor includes the specific measures related to its protection. A conflict

of objectives arises from the requirement that new building facades in Zone U be (traditionally) constructed in wood, and the fight against deforestation (MP, 2016, p.93). Timber-demanding rules are also enforced in zone N: “Wooden traditional buildings related to agricultural activity only” (MP, p.81).

The majority of Laos’ citizens live in rural settings, depending on using forest resources for multiple purposes. According to the World Resource Institute, Laos lost primary forest on 0.3% of its territory just in 2019, almost twice as much as Brazil’s 0.16% (WRI, 2020). Since the country’s population has tripled in the last 55 years, while forests have simultaneously become degraded; quality forest per capita has been dramatically shrinking. Examples of sustainably used forests are rare. Resources from public land are often extracted free of charge (common

<sup>1</sup> <https://whc.unesco.org/en/list/481>



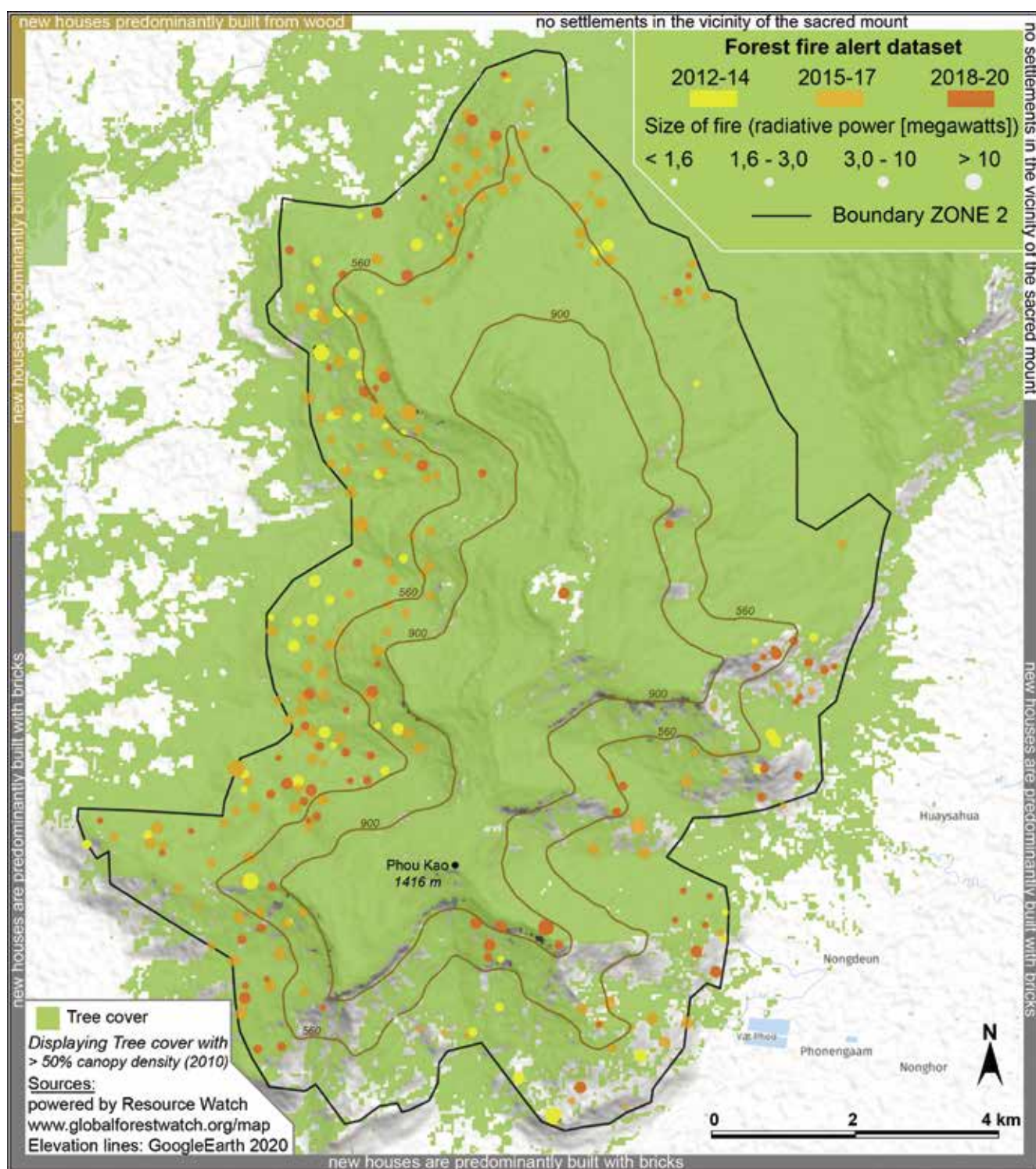


Fig. 4: Forest fires in Zone 2, 2002–2020.

Map: Martin Lenk

land), resulting in low incentives to invest in managed village forests. The matter, however, is by far more multi-layered than described here.

### Fires and Deforestation

The Master Plan highlights those two critical action areas and the respective policies. This paper is not looking into the details of the policies, but focuses on observations. Fires and de-

forestation are, at the most, destructive human interventions to be analysed systematically, including their root-causes and their impacts to the property's integrity.

During the nine-year period from 2012 to 2020, 286 fires have been tracked inside Zone 2. The destructive effects of each fire are difficult to estimate from the dataset. The data is designed to alert fires in real-time and can provide hints which areas are less affected (no alerts) and where the situation has to be clar-

ified (many alerts). Most fires occurred in the valleys while the level of integrity above 900 m asl is still good. In the healthy autochthonous forest ecosystem of all parts of Zone 2, natural fires would be atypical.

Years	Size of fire (radiative power [megawatts])				Total
	< 1,6	1,6 – 3,0	3,0 – 10	> 10	
2012–14	19	18	16	3	56
2015–17	26	51	69	5	151
2018–20	31	28	19	1	79
<b>Total</b>	<b>76</b>	<b>97</b>	<b>104</b>	<b>7</b>	<b>286</b>

Fig. 4: Number of forest fires in Zone 2, 2012 – 2020. Source: [www.globalforestwatch.org](http://www.globalforestwatch.org)

### Causes of forest fires are

1. Uncontrolled burning of farm-land/grassland outside Zone 2,
2. Burning of existing farmland/grassland inside Zone 2<sup>2</sup>,
3. Burning of forest to create farmland inside Zone 2<sup>3</sup>,
4. Self-lighting trash or discarded cigarette butts,
5. Fire used by hunters/poachers,
6. Clearing the way for gathering or logging,
7. Forest degradation in general,
8. Lightning strikes,
9. Others, like balloon-lanterns used during Vat Phou festival (Bazin, 2020, p.12).

Since many fires occurred in terrain unsuitable for farming it can be concluded that many fire raisers are loggers or hunters. The forest above the archaeological centrepiece of the WH Site, the sanctuary, was largely destroyed by a forest fire in 2010. In the meantime, bamboo thickets dominate and the area burned again in 2016 and 2020.

Chain saws noise can be heard inside Zone 2 by any casual visitor, indicating timber extraction at a larger scale. A road for hand-tractors was built about half a kilometre inside Zone 2. Up to ten tractors were at the site. Since trail-building is part of the timber extraction costs, it seems that the logger teams approach systematically taking out valuable wood sector by sector. If the area is suitable for farming, the remaining forest (softwood, young trees) are burned. The loggers thus became the spearhead of forest destruction. Logging also tears down trees which are not targets of the loggers as collateral damage. Furthermore, it weakens the protection of the canopy cover against storms. While the forest in the lower elevations has been largely degraded or destroyed since WH inscription 20 years ago, the integrity of forest at higher altitudes still seems to be fairly intact.

<sup>2</sup> e.g., 14.85904°, 105.81504°

<sup>3</sup> e.g., 14.85672°, 105.75653°



Fig. 6: Loggers penetrate deeper and deeper into the forest from all sides.

Photo: Martin Lenk

### Further observations at the Sacred Mount

Increasing deforestation at steeper faces of the Sacred Mount correlates with drastic increase of landslides. The loss of forest cover on the slopes behind the *sanctuary* directly threatens the archaeological complex. The 2019 landslide is an explicit warning not to wait with afforestation. A giant landslide happened less than a year ago, wiping out several hectares at altitudes from 680m asl down to 380m asl<sup>4</sup>.



Fig. 7: Entrance area to the main temple complex. The 2019 landslide can be seen from far immediately above the Sanctuary in the midst of degraded forest.

Photo: Martin Lenk

The area around the sanctuary has been known as a good place to observe monkeys. Not anymore, although the presence of hunters indicates that there is still wildlife in Zone 2. Hunters enter Zone 2 with dogs and imitate primate calls to attract monkeys for hunting on top of the mountain. Other wildlife to be observed are squirrels, snakes and various birds, including pied hornbills.

In the vicinity of Zone 2 active kilns are common. As village woodlands get more and more turned into charcoal it is only a matter of time until kilns will be loaded with wood from Zone 2. Similar effects may concern livestock in the future. Currently many plots get fenced, which reduces public grazing ar-

<sup>4</sup> 14.85982°, 105.76332°



eas. For some villages it may become attractive to use the Sacred Mount as a (forest) pasture.

People tend to build their houses with the cheapest construction material available. While in the east and in the south of the Sacred Mount new buildings are built preferably from stones, in the northwest new houses are still wooden (Fig. 8). Apparently, the northern part of Zone 2 and the adjacent area still yield enough hard wood. While villages to the south have had to accept that timber is scarce, “cheap” timber is still being harvested in the northwest. Trees are felled for both own consumption and to be sold on the market. There is a conflict between building statutes in the WH area and forest protection. In addition, the need for wood for the construction of fences should not be underestimated.



Fig. 8: New wooden house construction in a settlement northeast of Zone 2.

Photo: Martin Lenk

## Recommendations

1. Put boundary signs at all main entrance trails (an estimated 20–25 trails carry 95+% of the traffic).
2. Create incentives for the villages not to start forest fires.
3. Review of the “the policy against fire and against deforestation” and put in place effective measures against them.

4. Commission a comprehensive evaluation of the conservation status of the 100km<sup>2</sup> Sacred Mount Zone.
5. Increase working with, and investing in the adjacent communities.
6. Develop and implement a reforestation program. Establish adequate tree nursery capacities.
7. Terminate farms which have encroached on Zone 2.
8. Implement wildlife protection legislation. Dogs should be categorically prohibited in Zone 2.
9. Ensure that village heads are well aware of Zone 2 boundaries and do not issue felling permits.
10. Set up a register of perpetrators.
11. Consider (suspending) building statutes for wooden houses unless village forests yield enough timber.
12. The 20th anniversary of the Vat Phou WH inscription in 2021 will be a good occasion to foster protection and rehabilitation of the Sacred Mount Environmental Conservation Zone.

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# Raising Local Voices, Supporting Local Concerns in Bali's World Heritage Site

Wiwik Dharmiasih, Universitas Udayana



Fig. 1: Subak Jatiluwih.

Photo: Wiwik Dharmiasih

The Bali World Heritage Site (WHS) was established in 2012 in the face of immense pressure threatening the integrity of the *subak* system, a water management system that produces the iconic rice terraces across the island. The rationale for designation (or what UNESCO calls its Outstanding Universal Value) rests on the *tri hita karana* philosophy, which is ubiquitous to Balinese society and most embodied by the *subak*, highlighting the manifestation of people's relationship with one another, relationship to the environment, and the relationship to the spiritual realm. The *subak* is at once a democratic governing institution and a site of cultural practices, and provides the code for sustainable water and natural resource conservation for generations.

The impetus for designating this Cultural Landscape, the only one of its kind in Indonesia, was due to the land use changes transforming the *subak*. These changes were taking place due to the pace of tourism development, changing rice fields with

destination facilities. Thought to be more lucrative than rice farming, many Balinese left their rice paddies for tourism industry jobs, an exodus especially prominent among the younger generations.

The Cultural Landscape of Bali Province – the name of the WHS – is located across four sites that span five districts, amounting to an area of over 19,000 hectares. The most visited *subak* in the Catur Angga Batukaru region, Subak Jatiluwih, has long been a popular destination to view an expansive panorama of the rice fields (see Fig. 1). Tourists generally arrive at the outskirts of the village where they pay an entrance fee. Once in Jatiluwih, most visitors park at the UNESCO placard to take pictures and tend to visit the line of restaurants overlooking the panorama of paddies. Some will venture into the *subak* trails to get a closer look at the rice terraces, following different paths that loop through the landscape (see Fig. 2).



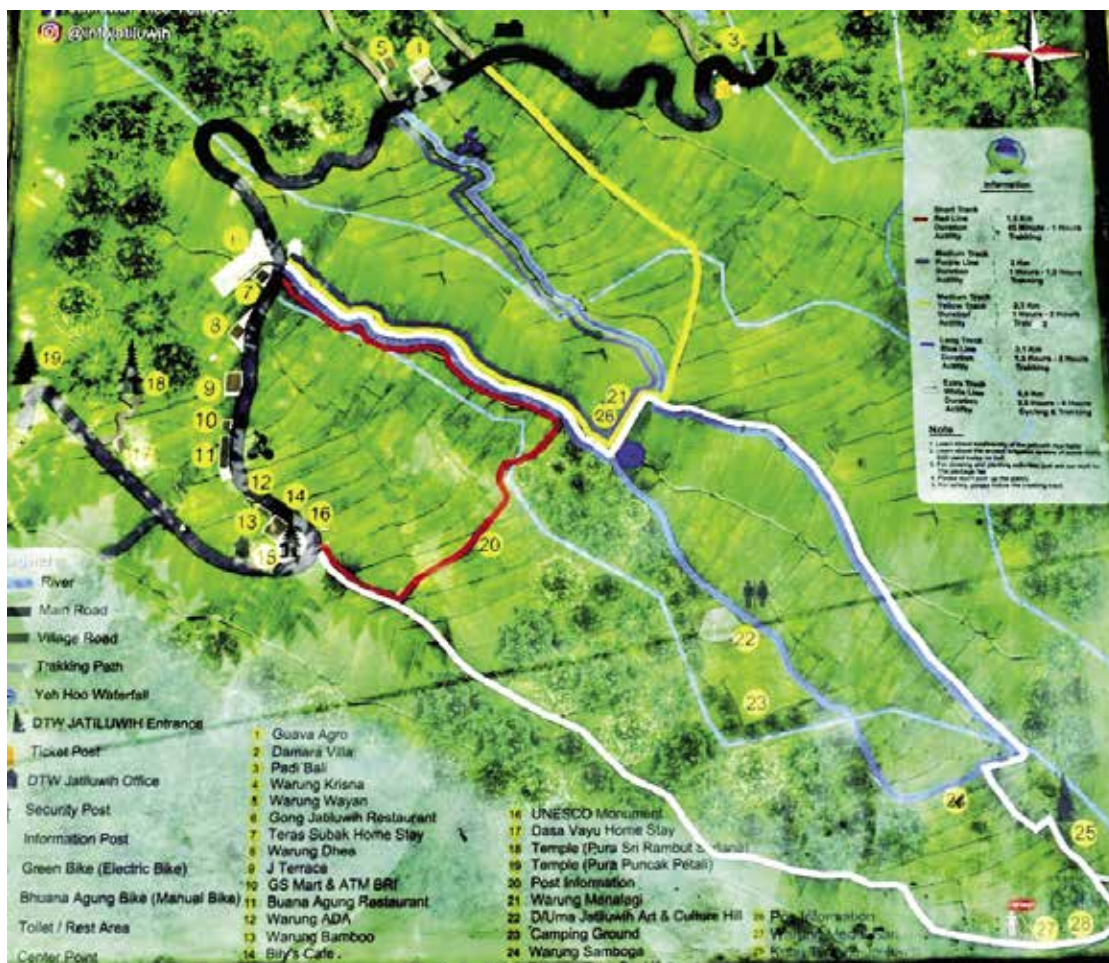


Fig. 2: A tourist information panel in Jatiluwih indicating a concentration of touristic facilities along the main road, and suggesting certain hiking routes.

Source: [www.familyearthtrek.com](http://www.familyearthtrek.com)

With the significant influx of tourism since WHS designation, Subak Jatiluwih has also undergone various changes to accommodate tourism. Some local farmers with access to capital began to develop infrastructure. This posed a problem, however, because the development began to take place in the rice fields, the very object that designation had sought to protect. Aware of these changes, the Ministry of Education and Culture together with UNESCO began to convene a series of facilitated meetings to develop a Sustainable Tourism Strategy (Dharmiasih and Arbi 2017). Local institutional representatives, including *pekaseh* (heads of *subak*), villages, various NGOs, and the Destination Management Body (Daerah Tujuan Wisata / DTW), joined in a process to map out the site, identify key assets, clarify local attractions, and identify interventions whereby tourism could be a benefit to local livelihoods while not putting too much pressure on the site.

### Ongoing challenges of World Heritage Site Management

On paper, WHS management began with the Governing Assembly. Since it was deemed to be overly complex and difficult to convene, NGOs sought to facilitate local community empower-

ment initiatives to support more direct involvement through the establishment of the Forum Pekaseh of Catur Angga Batukaru (Royo et al. 2016). The Forum, consisting of the heads of 20 subaks, came together to conduct participatory mapping and instituted regular meetings. Nevertheless, rapid changes continued, which one farmer has described as a mushrooming of development throughout the rice fields (Dharmiasih 2020a).

Though there were various efforts to convene key stakeholders to discuss local concerns, more deliberate and lasting management initiatives were unable to take shape. Over time, site management was increasingly relegated to the tourism initiatives overseen by the DTW. As a local body managing tourism in Jatiluwih, DTW mostly performed the role of collecting entrance fees. Revenues were then divided among key local stakeholders, but the *subak* received the least of these allocations. Meanwhile farmers increasingly began to feel as though there was a lack of support for local facilities, unmet commitments to transition to organic farming, and overall conditions that incentivized locals to turn away from farming. This is especially true among the potential future generation of farmers. As the shift to tourism priorities increase, some farmers have grown wary of the potentially irreversible trends that have influenced local cultural practices.

## Key conflicts

Division has grown in the community, between those in support of the WHS in Jatiluwih and those critical of its impacts (Dharmiasih 2020a). Several key conflicts gained broader media and institutional attention. Two examples include: the establishment of a parking lot that converted rice fields that then subsequently became the site of a restaurant (Dharmiasih 2019) and conversion of rice fields for a helipad to serve VIP tourism (Tribun Bali 2019). To address these conflicts and the growing awareness over heightened vulnerabilities to the integrity of the site, UNESCO (2019) called for a Heritage Impact Assessment and requested follow up on the Government of Indonesia's plans to establish a National Strategic Area.

These initiatives are important for the broader management of the site, particularly at redirecting resources to the area. However, over time there is an increasing sense among local communities that everyday voices are overlooked. Farmers increasingly express concern about how much change has taken place, and fear they have lost control over their ability to influence these changes. In this light, there is a growing consensus that there needs to be a better mechanism for people to voice their concerns and to more actively be involved in shaping management decisions that are currently driven by tourism interests. For example, NGOs have in the past played an important role as a bridge for raising these issues with formal institutions and should continue to do so in the future. Going forward there are several key initiatives that can be done to address these concerns in Jatiluwih.

## Raising local perspectives

Given the changes taking place in Jatiluwih and the concerns among local youth and farmers reaching out for support, Photovoices International (PVI) and the Subak Research Center of Universitas Udayana applied a photovoices methodology to try to help raise local perspectives (Wang and Burriss 1997; Dharmiasih 2020b). The initiative engaged eight participants of men and women ranging from ages 15-70 to facilitate a discussion around the theme "the future guardians of heritage" to highlight what is most important about the *subak* and what should be sustained in the future. Cameras were provided to each participant, and facilitators worked with them to share their perspectives on the overarching theme (see Fig. 3).

The main topics revolved around tourism, agriculture, land use change, infrastructure, water resources, cultural practices, and gender. Several exhibitions were conducted to allow the participants to share with various government agencies and NGOs. The process was both empowering for the participants and helped to clarify some of the key issues on WHS management, which are being raised in a series of discussions with UNESCO. In these discussions the participants explained that they are the ones facing various issues due to WHS designation. Yet, they



Fig. 3: Local farmers raising concerns through their photography.

Photo: Wiwik Dharmiasih

also feel they do not have the mechanisms to have a say in shaping future outcomes. The cameras gave the communities the power to tell their own stories and share concerns while providing them the opportunity and confidence to tell stories on their own terms (Dharmiasih et al., in press). As bridging institutions, NGOs like the PVI initiative play an important role in convening discussions about the future direction of WHS management. There are two immediate concerns in Jatiluwih, the first related to tourism, and the second on agricultural issues.

## Re-engaging tourism from below

Without the proper facilitation from UNESCO on WHS designation, tourism has taken place as an ad hoc process. As a result, tourism activities, particularly the industry actors that benefit, are often entities and institutions that come from outside. For example, many of the external guides that bring tourists to the site may have a general understanding of the *subak*, but even their explanations are often misguided, and mistake some of the local cultural features of *subak* institutions in Jatiluwih. One of the participants of the PVI initiative shared his experiences of trying to work as a local guide. He took a collage of photos showing how tourism might be more locally empowering.

When he works as a guide, he does not simply take visitors to view the rice terraces but rather begins by incorporating a forest walk to identify the spring water that serves as a source of life throughout the site. Guiding visitors into the homes of local residents, he also provides opportunities for households to serve local delicacies that support home industries, and only



then does he lead the tourists through the rice fields, highlighting the many interconnected elements manifested in the subak. In this way, he explained that tourism, if done right, can help to deepen relationships between visitors and local farmers.

If the WHS in Jatiluwih is to stay true to the principles embodied in the site's designation, going forward tourism engagement needs to support local communities to determine tourism on their own terms. Examples for supporting these outcomes would include capacity building—particularly youth interested in potentially becoming local guides—as well as developing a narrative about local cultural practices and traditions that are locally rooted and can translate into additional livelihood opportunities.



Fig. 4: Local farmer as a tour guide.

Photo: Wiwik Dharmiasih

### Supporting the *subak* as an agricultural institution

One of the key impacts of tourism development is its continued encroachment and undermining of local agricultural practices. Indeed, formerly subak-oriented facilities like roads, have hence begun to serve as facilities that increasingly privilege tourists. In addition, the land uses are also steadily making way from rice fields to tourism infrastructure facilities that have created significant impacts, including the conversion of rice land to other uses, pollution into the drainage canals from increased solid waste and refuse from restaurants, erosion from the increased volume of visitors, and more.

The routes critical for the *subak*—for farmers to bring their equipment to the field, to bring home harvest, and serve as regular commutes—not only contend with increased traffic from tourists, but have also experienced lots of additional pressure without the necessary maintenance support. In some cases, dangerous landslides have incapacitated important routes into the rice fields. Farmers express that even though there are additional financial benefits from ticketing, these benefits are not being used to construct and maintain the critical subak infrastructure at an adequate level.

Meanwhile, one of the key tenets of the WHS management plan was a commitment to support the return to organic farming, to slowly reduce the dependency on expensive and hazardous pest control measures and chemical fertilizers. Nevertheless, after eight years of designation, there is yet to be certified organic farming at the site and only four farmers express their full commitment to non-pesticide agricultural practices. Meaningfully supporting local agriculture would require a plan and commitment from various institutions, including governments and other stakeholders to help incentivize transitions to organic principles.

### Trajectories beyond the pandemic

The pandemic has brought tourism to a standstill on the island of Bali, and there are indications that the next best alternative for sustainable economic development is to support local agricultural industries. As elsewhere in Bali, people in Jatiluwih are anticipating increased tourism growth after the pandemic ends. These transitory periods can provide the opportunity for rethinking ways for conducting tourism and agriculture in new ways that return to the originally intended principles of designation.

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## IV. World Heritage Properties and Indigenous Peoples



# Canada's "Call to Action" for Wood Buffalo National Park has not Fully Materialized

Mikisew Cree First Nation



Wood Buffalo National Park in northern Canada is the country's largest World Heritage Site and one that supports the ways of life of at least 11 indigenous peoples, including the Mikisew Cree First Nation. Following a 2014 petition from the Mikisew Cree First Nation and a 2016 joint World Heritage Centre / IUCN Reactive Monitoring Mission, the World Heritage Committee concluded that Canada was not adequately protecting the Park's OUV from major threats and management concerns that exist outside the Park's boundaries.



Fig. 1: Aerial view of the Peace Athabasca Delta.

Photo: Denise

Golden / Mikisew Cree First Nation

A report on the Park's state of conservation belatedly submitted by Canada in 2020 (the "2020 Report") is the first report by the State Party since the Committee noted in 2019 that the continued deterioration of the Park's OUV could constitute a case for inscription of the property on the List of World Heritage in Danger. Perhaps not surprisingly, the 2020 Report paints a picture that the implementation of an Action Plan prepared by Canada in response to the threats and management concerns facing the Property is far advanced. Yet, the 2020 Report obscures the reality that implementation of the Action Plan (and the path to improving the state of conservation of the OUV, including the Peace Athabasca Delta and Wood Bison) is seriously undermined by a number of systemic factors and that little to no progress has been achieved in key areas. Importantly, the

2020 Report does not provide a clear picture of the new threats to the Park's state of conservation that continue to emerge and the persistence of existing threats.

To the Mikisew Cree First Nation, it is clear that the crisis facing Wood Buffalo National Park has not been averted and that Canada must increase – and improve and remedy – its efforts to address previous Committee requests.

## The Action Plan is not in sync with the fact that threats to the Park's State of Conservation remain high and are increasing

The 2016 Reactive Monitoring Mission noted that many of the values justifying the Park's World Heritage status are concentrated in the Peace Athabasca Delta within the Park. A major concern for indigenous groups and others in 2021 is that, notwithstanding the Committee's recognition of the deterioration of the Property, governments within Canada are continuing to facilitate the growth of threats associated with the oil sands and hydroelectric industries on the two main rivers that create the Peace Athabasca Delta, the Peace and Athabasca River. Therefore, it is imperative that the Committee evaluate Canada not just on what is in the Action Plan, but also on the government actions that are taking place alongside the Plan.

The disconnect between the stated goals of the Action Plan and the domestic situation is particularly clear in the case of hydroelectric development on the Peace River. Dams on the Peace River play a clear role in impairing the natural flooding cycle that is essential for maintaining the Peace Athabasca Delta ecosystem. Since the Action Plan was developed, construction of a new, large scale hydroelectric project on the Peace River, the Site C Dam, has advanced significantly. Diversion of the Peace River for the Site C Dam began in the fall of 2020, even though key actions relating to environmental flows and hydrology of the Peace River in the Action Plan have not been completed (or started in many cases).<sup>1</sup> It is difficult to see how that is any-

<sup>1</sup> <https://www.sitecproject.com/construction-activities/river-diversion#:~:text=Due%20to%20the%20fluctuation%20of,a%20period%20of%20several%20weeks.>

thing but inconsistent with a major goal of the Action Plan, namely to achieve water quantity improvements for the Peace Athabasca Delta (achievement of which depends on restoring a more ecologically-driven approach to water management).



Fig. 2: The Site C construction site in 2018.

Photo: Garth Lenz / The Narwhal

Risks and threats associated with oil sands development have also quietly continued during the last two years, during which time new approvals have been granted for oil sands projects upstream of the Park without assessment of potential effects of those projects on the Property. In one instance, more than one federal department noted the potential for a proposed oil sands mine to impact the Property, yet the federal environmental minister declined to require a federal impact assessment of those potential impacts. We have challenged that decision in the courts, an action that is being fought by the federal government.

New information and proposals continue to highlight the risks associated with the large tailings ponds along the Athabasca River. For example, a report in 2020 by an independent fact-finding body under the North American Agreement on Environmental Cooperation concluded that there is evidence of

seepage of tailings into groundwater near the Athabasca River. The report was also critical of Canada's lack of oversight over tailings impoundments, finding that Environment and Climate Change Canada has been remiss in addressing the issue.

And, since the last meeting of the World Heritage Committee, Canada has begun a process to establish regulations to enable oil sands effluent to be released into the Athabasca River, something that all indigenous groups in the region have opposed. Until wastes from oil sands can be managed safely, sediment transport and source-sink pathways of contaminants from oil sands are understood, and indigenous peoples are meaningfully involved in the management of water volumes, the Committee should be very concerned about these new plans to deal with chemical waste from upstream oil sands developments.

### Serious challenges limit the efficacy of the Wood Buffalo National Park Action Plan

The 2020 Report creates an appearance that much progress has been made in all areas of the Action Plan. While certain efforts have started, the reality, again, is more concerning and gives less cause for optimism. Early efforts to implement the Action Plan have illuminated significant problems that must be resolved if the Action Plan is to be effective: inadequate governance, particularly relating to water; inadequate allocation of long term resources; limited progress creating partnerships and advancing reconciliation with indigenous peoples; and a lack of timely corrective measures relating to the most significant threats to the Park's OUV. Because of these problems, Action Plan accomplishments over the last two years have been muted, and key actions critical to halting the deterioration of the Park's OUV remain incomplete and, in some cases, suspended.



Fig. 3: Map of threats to Wood Buffalo National Park.

Source: UNESCO WHC/IUCN Reactive Monitoring Mission Report

This is particularly acute for the aspects of the Action Plan relating to water management, the heart of the cause of the deterioration of the Park. Of note:

1. There continues to be no assessment of the effects of the Site C Dam on the property.
2. There is no framework or governance mechanism for flow management on the Peace and Athabasca Rivers to support the Property's OUV.



3. Proposed work to establish mechanisms for properly managing the flow of the Peace River has been stalled by provincial jurisdictions and no timelines have been established for restarting and completing that work.
4. Work to establish water control structures in the Park and to advance modelling has been hampered by inadequate resources.
5. Indigenous groups report problems with transparency and inclusion.

Canada points to the inter-jurisdictional nature of water under Canadian law as a reason for these challenges. The Committee should expect outcomes, not a reiteration of challenges that have been known for decades. The important fact is that institutions and agreements to manage water in manner that is protective of the Park's OUV have not been established.

Despite Canada being a wealthy country, impediments from under-resourcing have stalled essential actions, including:

1. Important aspects of the environmental flow and hydrology assessment
2. The creation of a water governance framework to support environmental flow and hydrology work;
3. Installation of water control structures and weirs
4. Creation of research stations in the Peace Athabasca Delta
5. Enhancements in Peace Athabasca Delta research and monitoring, including the establishment of the proposed indigenous-led monitoring centre.

In December 2020, Canada announced that it intends to provide an additional three years of funding for the Action Plan. This appears to be a positive response to the Committee's observation that the Action Plan was inadequately resourced. However, the announcement warrants close scrutiny. For one thing, Canada has yet to provide details on how the money will be allocated, making it difficult to evaluate its sufficiency. Second, short term funding does not allow for the creation of stable governance mechanisms or meaningful partnerships with indigenous peoples. Third, short term funding is inconsistent with the need for longer term actions, like establishing an integrated cumulative effects monitoring program for the Peace Athabasca Delta. And as we observed in December: "While funding is critical, no one should lose sight of the fact funding must come with a clear timetable for taking actions and it must be combined with real commitments from all jurisdictions to fix the problems facing the Peace Athabasca Delta. Ultimately, the status of Wood Buffalo depends on how fast Canada moves to take real action to address the causes of its deterioration and establish new safeguards for the park."

For our part, as traditional stewards of the Peace Athabasca Delta, we have been investing time and resources to try to es-



Fig. 4: Forest in the Site C Dam flood zone of the Peace River.

Photo: Garth Lenz / The Narwhal

tablish a partnership with Canada around the Action Plan. Yet, we struggle to match comments in the 2020 Report about Canada's "ongoing commitment to fair, transparent, and meaningful engagement" with our experience of having spent close to a full year seeking to formalize a partnership with Canada to identify priorities and substantive outcomes for Action Plan implementation without resolution. Clearly, Canada needs to do more, including providing long term funding for the monitoring and research entity proposed by the indigenous communities of Fort Chipewyan, for the words in the 2020 Report to match reality.

## Recommendations

Given the ongoing threats to the Park and the serious structural problems that undermine the prospect that the Action Plan will address the crisis with the Park,

- we recommend that the Committee note its concern that the deterioration of Wood Buffalo National Park has not been halted by the Action Plan and take appropriate steps for advisory bodies to support the Committee's consideration of inscribing the property on the 'Heritage in Danger' List.
- At the same time, we also recommend that the Committee request that the State Party address the issues raised previously by the Committee – such as immediately establishing effective water governance mechanisms and agreements, creating effective indigenous partnerships that advance reconciliation (including advancing the establishment of and long term support for the monitoring and research institution proposed by the indigenous communities of Fort Chipewyan), resolving the lack of long-term resourcing for the Plan and expanding efforts to share governance authority over the Park itself – so that those outcomes can be evaluated by advisory bodies.

Canada has the ability and resources to correct course and halt the deterioration of Wood Buffalo National Park as it says it is committed to doing. We believe the Committee has a critical role to play in making sure this happens.

# Chaco Canyon and the Greater Chaco Landscape at Grave Risk Because of Oil Drilling

Paul F. Reed, Archaeology Southwest



Chaco Culture National Historical Park (also known as Chaco Canyon), New Mexico is under grave threat from oil-gas development (see Fig. 1). Chaco Canyon is one of only 24 World Heritage sites in the United States, and it is the one most threatened by encroaching oil-and-gas infrastructure.



Fig. 1: Oil drilling rig at work in Greater Chaco (foreground). Note the ongoing flaring at a fracking well in the background.

Photo © Paul Reed

Threats to Chaco's World Heritage Site status and impacts to its Outstanding Universal Values as a result of oil-gas development include:

1. flaring of excess natural gas from wells close to the Park's boundary, which compromises Chaco's designation as a Dark Skies Park;
2. impacts to Chaco's viewshed and soundscape as a result of visual and sound effects of infrastructure;
3. destruction of the integrity of the ancient Chacoan landscape as more and more oil wells and other facilities are built; and
4. severe impacts to the spiritual feeling and essence of the ancient Chacoan landscape.

Because of these threats, and beginning in 2016, Archaeology Southwest and its partners have strongly advocated for the creation of a 10-mile-radius protective zone. The cultural buffer area would be enforced around Chaco Canyon and two of its outlying great house communities. To put the 10-mile buffer zone in place, our coalition has pursued both legislative (through the US Congress) and regulatory (through the Federal managing agencies) action.

Chaco Canyon was the center of a thriving society that flourished in the Four Corners region of New Mexico from 850–1250 CE. The Chacoans and contemporaneous, affiliated Pueblo groups built hundreds of great house structures across the region, many of which were connected by kilometers of roads and other landscape features. This is the Greater Chaco Landscape. These places have deep spiritual and cultural importance to contemporary Pueblo people, who are descendants of the Chacoan people.

Today, this extensive ancient landscape is managed by a variety of federal, Tribal, state, and private owners. Many sites associated with ancient Chacoan society are protected within the boundaries of Chaco Culture National Historical Park. Chaco Canyon and several of its outlying great houses are UNESCO World Heritage Sites that preserve the history and culture of the Pueblo people.

Despite the protection offered by Chaco Culture National Historical Park, many sites lie outside the Park across the Greater Chaco Landscape. These places are scarcely protected from the ravages of oil-gas development, despite the World Heritage Site status of five sites / properties managed by the Bureau of Land Management (BLM). Increased oil-gas development associated with the Mancos-Gallup Shale play in northwest New Mexico has been threatening fragile Chaco-affiliated cultural resources across a large portion of the San Juan Basin since late 2011 (see Fig. 2). The threat to sensitive cultural resources is heightened by recent Trump administration orders that aim to prioritize energy development on public lands. These actions will further fragment and degrade the Greater Chaco Landscape.

In response to drastic expansion in oil drilling in the Mancos Shale formation, the BLM (Farmington Field Office) began the process of amending the long-term resource management plan for the area in 2014. Seven years later, this process is nearly complete. If the current approach continues under the incoming Biden administration, the Greater Chaco Landscape will not be protected. In their draft planning documents, the BLM and partner agency Bureau of Indian Affairs (BIA) favor policies that do not provide for a protective buffer zone around the Chaco Park. Beyond clear concerns for the protection of the World Heritage site at Chaco that a 10-mile buffer zone would offer,



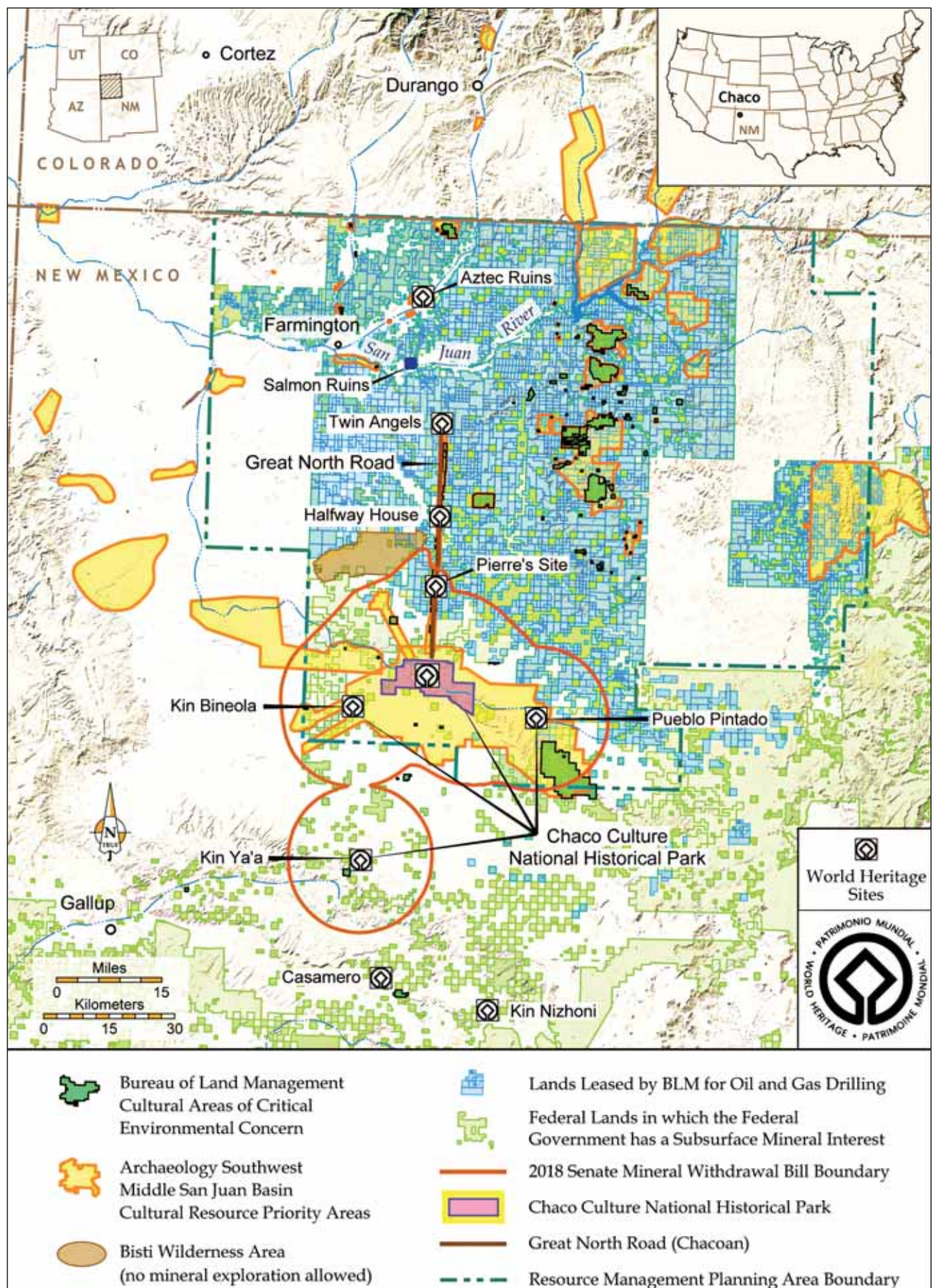


Fig. 2: The location of Chaco Culture National Historic Park, oil-gas leasing encroaching on Chaco, and the Greater Chaco Landscape in the American Southwest. Note the proposed 10-mile cultural buffer zone.

Map: Catherine Gilman for Archaeology Southwest



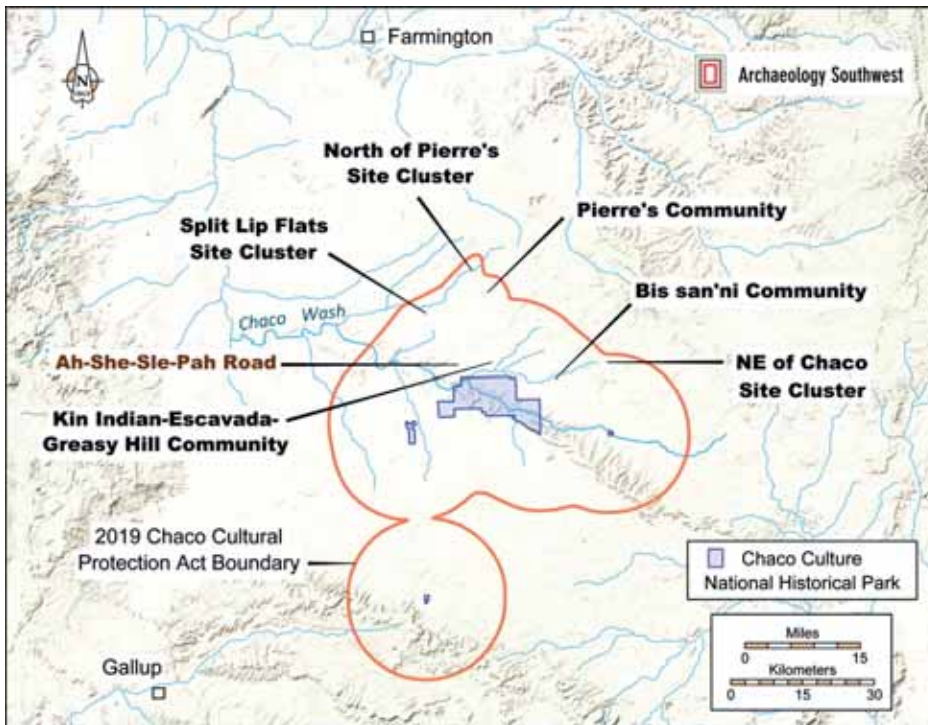


Fig. 3: The Greater Chaco Landscape showing site clusters/communities and the 10-mile cultural protection and buffer zone.

Map: Catherine Gilman for Archaeology Southwest

there are also significant concerns about the archaeological and cultural sites within the 10-mile buffer zone.

The 2019 US House of Representatives bill (HR 2181) and pending Senate companion bill, known as the Chaco Cultural Heritage Protection Act, will provide permanent protection in a 10-mile buffer zone by withdrawing the Federal minerals from oil-gas development. A version of this bill was originally introduced in the US Senate in 2018, where it was not passed out of committee. Subsequently, in 2019, the Chaco Protection Act was introduced in the US House as HR 2181 but the bill stalled in the US Senate in 2020. As the US Senate and House of Representatives begin work in 2021 under Democratic leadership, passage of the Chaco Protection Act should be near the top of the priority list. When the bill passes, it is very likely that President Biden will sign it into law. In addition, the All-Pueblo Council of Governors passed a resolution supporting the Chaco Protection Act in 2018 (APCG 2018; see Appendix).

To better understand the nature and extent of cultural resources in the 10-mile protection zone, Archaeology Southwest undertook a reconnaissance project in 2020, focusing on the northwest, north, and northeast portions; see Figure 3 (Reed 2020). The approximately 700,000-acre area encompassed by the zone contains roughly 4,200 known archaeological and historic sites. These sites speak to episodic use of the area by diverse cultural groups (Paleoindian, Archaic, Puebloan, Navajo, and others) from about 12,000 BCE to the present. Because less than 20 percent of the area enclosed by the 10-mile zone has been surveyed, however, the actual cultural and historic property count is undoubtedly much higher. In addition,

little recent ethnographic work has been undertaken with any Pueblo or Tribal groups, aside from the Pueblo of Acoma's 2018 project with Archaeology Southwest. Dozens of traditional cultural properties (TCPs) were revealed during the Acoma Project, indicating that there are probably hundreds, if not thousands, of TCPs and other Tribal cultural sites as yet unidentified across Greater Chaco.

The primary objective in this work is connected to the ongoing planning processes undertaken by the BLM and BIA and focused on an examination of the Greater Chaco Landscape at a different scale than is usually pursued by the Agencies. Although the Agencies' primary avoidance policy has spared many cultural resources from outright destruction, it has resulted in a

fragmented cultural landscape across the Greater Chaco Landscape. A better perspective considers cultural sites as pieces of larger communities on the landscape: a community- or landscape-based approach.

During the project, we assessed six site clusters or communities: Pierre's Community (included in the World Heritage designation for Chaco); North of Pierre's cluster; Split Lip Flat and Ah-She-Sle-Pah road cluster; Kin Indian-Escavada-Greasy Hill Community; Bis san'ni Community; and Chaco Northeast site cluster (see Fig. 3). The communities at Pierre's and Bis san'ni are well known archaeologically. The other four areas are not well known. These six areas represent a sample of the clustered sites and communities within the 10-mile zone and across Greater Chaco, and they clearly illustrate the high density of sites directly adjacent to Chaco Culture National Historic Park. These findings affirm our assertion that the 10-mile zone of protection is not arbitrary. The 10-mile zone contains irreplaceable ancient and historic sites and communities that merit greater protection than current policy and regulations provide.

Beyond the limited but important work completed by Archaeology Southwest in 2020, additional cultural research is necessary to understand the Greater Chaco Landscape and protect Chaco (see Fig. 4). Two separate cultural-ethnographic projects were funded by the US Government in 2018 and 2019. Together, these projects provide \$1.4 million in funding for Pueblos and Tribes to complete ethnographic-cultural work throughout the Greater Chaco Landscape. The timeline for the larger 2019-funded project is 18–24 months. This, then, is a very good reason for BLM and BIA to suspend the current planning



process until preliminary results from these projects are available, at minimum. Many additional TCPs and other sensitive cultural sites will be identified, and these will need careful evaluation prior to new leasing or permitting of oil-gas activities.



Fig. 4: Chaco's Great North Road from the site of Pueblo Alto, looking north. This view shows the expansive Greater Chaco Landscape that surrounds the National Park. Photo © Paul Reed

Why not manage this highly sensitive, complicated, World Heritage-protected cultural landscape with a different approach? The BLM and BIA could proactively identify areas of possible leasing where the Mancos Shale formation is present, where no families are currently living, and where known cultural and historic site densities are low. These areas could then be vetted by interested Pueblos and Tribes, and cultural resource concerns could be front-loaded into the process, rather than after oil companies have purchased lease parcels and are committed to specific locales. In addition, BLM and BIA can bring the APCG and individual Pueblos and Tribes into an active, decision-making role in the management of their ancestral lands.

It is clear that the BLM and BIA should postpone their final decisions on these planning processes and not attempt to finalize planning documents in 2021. Currently, prices for oil and gas are depressed, demand is low, and there is little prospect of improvements in the market in the near future. The draft planning documents will guide oil-gas development over the next 15 to 20 years. Delaying the final decision provides the time necessary to complete cultural-ethnographic studies that will surely inform more robust protection of the Greater Chaco Landscape and provide an appropriate protective buffer for the World Heritage sites in Chaco Cultural National Historic Park.

The 1987 UNESCO World Heritage Site designation included Chaco Culture National Historic Park (see Fig. 5), Aztec Ruins National Monument, and five additional sites/properties on BLM-managed lands across the Greater Chaco Landscape. To manage these important places across several US Government, state, Tribal, and other entities, the Interagency Management Group (IAG) was organized. This group is charged with consistent and coordinated management through review of management decisions, sharing of technical expertise, and assistance with necessary legislation. Despite the importance of the IAG in the protection of Chaco's World Heritage Sites, the group has not met for years, as of January 2021. This failure is BLM's re-



Fig. 5: Pueblo Bonito, the grandest of Chaco's protected World Heritage Sites. Photo © Paul Reed

sponsibility, and it seems clear that BLM is failing to proactively to protect the universal values of these World Heritage Sites.

Because of the threat to Chaco and the Greater Chaco Landscape, I implore the UNESCO World Heritage Committee to immediately contact the US Dept. of Interior and BLM offices to make clear that the Agencies' plans for managing the Greater Chaco Landscape are not only wholly inadequate, but also pose great risks to Chacoan World Heritage Sites.

## References

- All Pueblo Council of Governors (APCG). 2018. "Resolution Supporting Legislation Withdrawing Certain Federal Land in the State of New Mexico Surrounding Chaco Culture National Historic Park from All Forms of Mineral and Geothermal Leasing." All Pueblo Council of Governors Resolution No. APCG 2018-10.
- Reed, Paul F. 2020. "An Archaeological Reconnaissance of Chaco's 10-Mile Zone of Protection." Preliminary report. Archaeology Southwest Report 2020-102.

## Annex: All Pueblo Council of Governors Resolution of 2018 on Chaco Culture



**ALL PUEBLO  
COUNCIL OF  
GOVERNORS**

**Officers:**  
E. Paul Torres, Chairman  
Governor J. Michael Chavarria, Vice Chair  
Governor Val Panteah, Sr., Secretary

## RESOLUTION

### ALL PUEBLO COUNCIL OF GOVERNORS

#### RESOLUTION NO. APCG 2018-10

#### RESOLUTION SUPPORTING LEGISLATION WITHDRAWING CERTAIN FEDERAL LAND IN THE STATE OF NEW MEXICO SURROUNDING CHACO CULTURE NATIONAL HISTORIC PARK FROM ALL FORMS OF MINERAL AND GEOTHERMAL LEASING .

Acoma

Cochiti

Isleta

Jemez

Laguna

Nambe

Ohkay Owingeh

Picuris

Pojoaque

Sandia

San Felipe

San Ildefonso

Santa Ana

Santa Clara

Santo Domingo

Taos

Tesuque

Ysleta Del Sur

Zia

Zuni

**WHEREAS**, the All Pueblo Council of Governors is comprised of the Pueblos of Acoma, Cochiti, Isleta, Jemez, Laguna, Nambe, Ohkay Owingeh, Picuris, Pojoaque, San Felipe, San Ildefonso, Sandia, Santa Ana, Santa Clara, Santo Domingo, Taos, Tesuque, Zia and Zuni, and one pueblo in Texas, Ysleta Del Sur, each having the sovereign authority to govern their own affairs;

**WHEREAS**, the purpose of the All Pueblo Council of Governors is to advocate, foster, protect, and encourage the social, cultural and traditional well-being of the Pueblo Nations; and,

**WHEREAS**, through their inherent and sovereign rights, the All Pueblo Council of Governors will promote the language, health, economic and natural resources, and educational advancement of all Pueblo people; and

**WHEREAS**, the 20 Pueblos possess inherent government authority and sovereignty over their lands; and

**WHEREAS**, each All Pueblo Council of Governors member possesses its own cultural territory and sovereign right to protect its traditional cultural properties and sacred sites, whether or not they are located within each Pueblo's current exterior boundaries; and

**WHEREAS**, the protection of each Pueblos' traditional cultural properties and sacred sites is necessary to each Pueblos' cultural preservation now and into the future; and

**WHEREAS**, preserving the traditional cultural properties and sacred sites that exist in Chaco Canyon and in the Greater Chaco Region, including, but not limited to, the Chaco Roads, and Pierre's Site, along with protection of the night skies, soundscapes, view sheds, and sight-lines within and surrounding Chaco Canyon is essential to the cultures and traditions of the 20 Pueblos;







## ALL PUEBLO COUNCIL OF GOVERNORS

Officers:  
E. Paul Torres, Chairman  
Governor J. Michael Chavarria, Vice Chair  
Governor Val Panteah, Sr., Secretary

Acoma

**WHEREAS**, the 20 Pueblos recognize that the Greater Chaco region has been greatly impacted by oil and gas production that creates environmental degradation and creates human, animal, and plant health issues; and

Cochiti

**WHEREAS**, oil and gas drilling and related infrastructure, including roads and pipelines, in the Greater Chaco Region negatively impact and harm Pueblo traditional cultural properties and sacred sites and impair the cultural landscape(s) that include these traditional cultural properties; and

Isleta

Jemez

Laguna

**WHEREAS**, the Bureau of Land Management and the Bureau of Indian Affairs has leased over 91% of public lands and federal minerals in northwest New Mexico, including those areas surrounding Chaco Culture National Historic Park, for oil and gas development; and

Nambe

Ohkay Owingeh

**WHEREAS**, part of the remaining 9% of un-leased federal lands in northwest New Mexico administered by the Bureau of Land Management and Bureau of Indian Affairs surrounds Chaco Culture National Historic Park; and

Picuris

Pojoaque

**WHEREAS**, the All Pueblo Council of Governors has opposed ongoing oil and gas leasing affecting Chaco Culture National Historic Park and the 20 Pueblos' cultural resources, traditional cultural properties, and sacred sites in the Greater Chaco Region by protesting the postponed March 2018 Oil and Gas lease sale, and voiced its concerns by acting as a Cooperating Agency to the Bureau of Land Management's Resource Management Plan Amendment; and

Sandia

San Felipe

San Ildefonso

Santa Ana

**WHEREAS**, Senator Tom Udall intends to introduce legislation during the in the 115th Congress, Second Session titled the "Chaco Cultural Heritage Area Protection Act of 2018"; and

Santa Clara

Santo Domingo

**WHEREAS**, the "Chaco Cultural Heritage Area Protection Act of 2018" will withdraw federal land from all forms of location, entry, and patent under the mining laws and disposition of federal land under all laws relating to mineral leasing and geothermal leasing in an area surrounding Chaco Culture National Historic Park; and

Taos

Tesuque

Ysleta Del Sur

**WHEREAS**, protection of core area described in the proposed "Chaco Cultural Heritage Area Protection Act of 2018" attached map, described as the "Chaco Cultural Heritage Withdrawal Area", is an important step in protecting the 20 Pueblos cultural resources, traditional cultural properties, and sacred sites in the Greater Chaco Region; and

Zia

Zuni

**WHEREAS**, the withdrawal of these federal lands from future mineral leasing and development will assist in the protection and preservation of Chaco Culture National Historic Park and those cultural resources, traditional cultural properties, and sacred sites immediately surrounding the National Park.





## ALL PUEBLO COUNCIL OF GOVERNORS

Officers:  
E. Paul Torres, Chairman  
Governor J. Michael Chavarria, Vice Chair  
Governor Val Panteah, Sr., Secretary

**NOW THEREFORE BE IT RESOLVED**, the 20 Pueblos express their emphatic support for the proposed "Chaco Cultural Heritage Area Protection Act of 2018" planned to be introduced by Senator Tom Udall; and

**BE IT FURTHER RESOLVED**, the All Pueblo Council of Governors does hereby request the five members of New Mexico's Congressional delegation to take such actions to support the "Chaco Cultural Heritage Area Protection Act of 2018" as they reasonably can to ensure the introduction and passage of this bill; and

**BE IT FURTHER RESOLVED**, hereby authorizes the APCG Chairman, and his designees(s), to execute all actions and documents necessary to initiate the intent of this resolution.

### CERTIFICATION

We, the undersigned officials of the All Pueblo Council of Governors hereby certify that the foregoing Resolution No. APCG 2018-10 was considered and adopted at a duly called council meeting held on the 17th day of May, and at which time a quorum was present and the same was approved by a vote of 17 in favor, 0 against, 0 abstain, and 3 absent.

### ALL PUEBLO COUNCIL OF GOVERNORS

By: E. Paul Torres  
APCG Chairman E. Paul Torres

ATTEST:

Val Panteah, Sr.  
Governor Val Panteah, APCG Secretary



# The Need to Prevent the Future Degradation in the Yagul and Mitla Caves of Oaxaca

Guadalupe Yesenia Hernández Márquez, Preservamb



The state of Oaxaca, a territory located in the south of Mexico, has places of high value for conservation, from the natural and cultural perspectives. One of the emblematic sites is the area of the prehistoric caves of Yagul and Mitla, located in the Central Valley of Oaxaca. There, are the oldest agricultural remains in America (pumpkin seeds, among other species later domesticated); evidences of domestication of plants and animals, of the transition from nomadic to sedentary life and where the conditions that prevailed more than 10,000 years ago on the planet are preserved.



Fig. 1: General view of part of the Yagul and Mitla caves; 2021. Photo: Alicia Torres Porras

Due to this integrity, in 2010, this place was assigned as a world heritage site with the name of “Prehistoric Caves of Yagul and Mitla in the Central Valley of Oaxaca” through decision 34 COM 8B.42, covering the surface of 5,379.91 hectares (1,515.17 hectares correspond to the core area and 3,859.74 hectares to the buffer zone). The territory is part of the Zapotec Valley indigenous cultural zone and is located in parts of four municipalities: Tlacolula de Matamoros, San Pablo Villa de Mitla and 4 agrarian communities: Diaz Ordaz, Tlacolula, Ejido Unión Zapata and Mitla<sup>1</sup>.

This shared administration represents a challenge in the management of the site since it must be done through the coordination of the national government, the local state, the munic-

ipalities and these agrarian territories, each with its own regulations and vision. This place is superimposed with the Natural Protected Area administered by the Mexican government called “Yagul Natural Monument” in an area of 1,076 hectares and, finally, another protection measure is the coverage of 5,000 hectares of areas voluntarily oriented for conservation<sup>2</sup> by the localities that make up the territory of this heritage site.

According to the World Heritage Committee, the main authorities responsible for managing this site are: the National Institute of Anthropology and History (INAH in Spanish) and the National Commission for Protected Natural Areas (CONANP in Spanish) who, in coordination with local communities, carry out various activities aimed at conserving the area. Since some years now, this site has begun to be important as an attraction through rural community tourism projects, and it is a source of pride for the inhabitants of the surrounding towns who carry out surveillance tasks, the annual agrobiodiversity fair to remember the agricultural history of this area and recently, they created a seed bank of important plants. In conclusion, in this heritage site, there is a high degree of involvement of the local population, which is indigenous, from the Zapotec ethnic group.



Fig. 3: Some species and varieties presented in the agrobiodiversity fair, 2016.

Photo: Yesenia Hernández

1 Municipal subdivision related to the administration of the territory and natural resources.

2 Instrument in the Mexican legislation that allows local communities to establish protected areas, supported by the Mexican State.



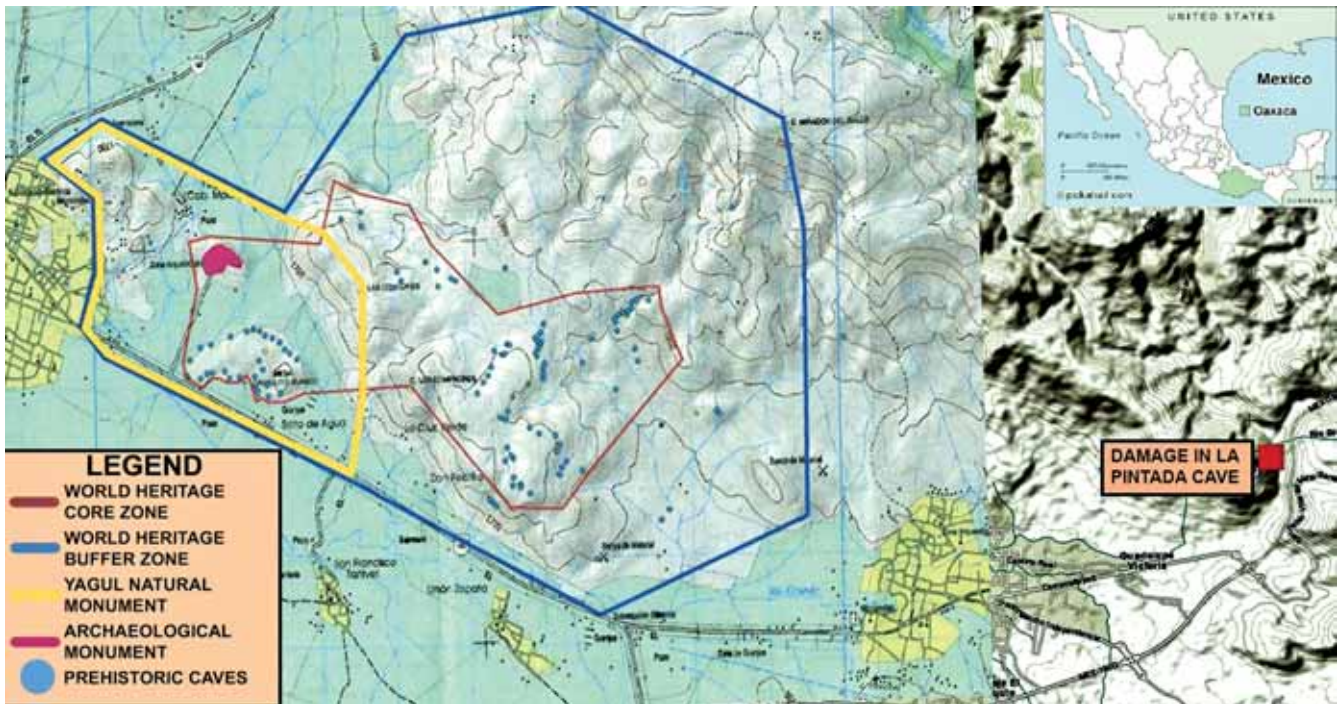


Fig. 2: The Yagul and Mitla caves within and outside the territory of the World Heritage and the Yagul Natural Monument.

Map: UNESCO / CNANP / Andrea Martínez F.

### What happened in the last 10 years?

In the first days of January 2021, a national press release was published, describing damage to the cave paintings of La Pintada, a cave located 5 km from La Fortaleza (the easternmost site of the heritage area, therefore it was neither in the core zone nor in the buffer zone of this site - this is the reason why few media covered this incident). Despite this, it is a very important area for its historical value.

site and to identify the threats and the pressure factors of the site. For this reason, a documentary review and a description of the events related to this heritage site were carried out, as well as interviews with the INAH and CONANP authorities and, finally, a visit to the site was planned but due to the conflicts derived from the damage, the authorization was not obtained.



Fig. 4 and 5: Destroyed pre-historic rock art of La Pintada cave. Photos: Quadratin Oaxaca



It is suspected that these damages were caused by unknown persons, possibly between December 31 and January 1 at night, due to the lack of surveillance.<sup>3</sup> They represent a serious attack on the cultural heritage of the area. From this event and due to the concern that the heritage site had been affected, a general review was carried out to determine the state of the

<sup>3</sup> These areas are monitored during the day by local residents, who, in the event of an irregularity, report it to their local authorities.



Ten years after the inscription of these caves as world heritage, there are few reports on compliance with the obligations established in the designation of the site and in the respective Operational Guides<sup>4</sup>. Other challenges are related to the lack of compliance with the requests made to Mexico at the time of the inscription of the site. Of these, the most urgent, is related to the „establishment of a long-term scientific research and monitoring program, for a better understanding of the cultural and agricultural landscape.“ This would provide information on the need to expand the original polygon of this heritage site, since there are caves with rock art that need protection, as we have seen against possible damage such as vandalism a month ago or because some religious changes that promote the oblivion and neglect of the caves. It remains unclear why the La Pintada cave has not been included in the World Heritage or at least in its buffer zone.

For example, little information is available on the rock art of the caves located at the site. On the other hand, there is ignorance about the effective conservation program, which the Mexican State had to implement to guarantee the control of access to the landscape and prevention of risks, and the measures to guarantee the conservation of the universal values of the place and, finally, the Committee's request for the establishment of a general management system coordinated with all relevant stakeholders, in accordance with the provisions of § 114 of the Operational Guidelines for the implementation of the World Heritage Convention. This last issue is one of the challenges encountered on the site, because despite the existence of interest by the people in charge of INAH and CONANP, who carried out various activities with local authorities and the general population, it is still not well defined what is the role that actors like the Government of the State of Oaxaca have played in the conservation of the area under the guidelines of the World Heritage Convention.

Another challenge that this site presents is related to the need of information about the implications of having a world heritage site, from the state and local authorities, inhabitants and other interested parties, as well as the specific measures that must be taken to assure the maintenance of the outstanding universal value of this site. The urban expansion in the adjoining areas would generate risks regarding the control of the entrance to this place; administrative changes at all levels that limit the creation of capacities (especially at the local level) for the adequate management of the site and the reduction of resources allocated to archeology and environmental conservation at the national level, limit the capacities of compliance with the heritage site protection measures. These are the main threats to the site.

## Diagnosis and urgent lines of action

The Yagul and Mitla caves as a heritage site have had scattered and insufficient measures for the conservation of the original characteristics of the place, which could affect in the future the permanence of its unique universal values - this would translate to a certain degree of abandonment. Because despite some good experiences, there is a lack of a comprehensive policy with the allocation of economic, technical or human resources, to develop measures that guarantee the protection of the area and, if considered, a sustainable use for the benefit of the local communities.

This effort requires the effective and strategic participation of the four levels of government (federal, state, municipal and local-agrarian), civil society and local inhabitants. Given the need to prevent this site from continuing with the situation previously described and, as a measure to avoid reaching greater risks, as a member of World Heritage Watch, UNESCO is respectfully requested to consider the following suggestions:

1. Require that the Mexican government, in its capacity as a State Party to the World Heritage Convention, present the corresponding reports of compliance with the Convention for this site and especially, present a report on what happened in the cave of "La Pintada" and how this could affect the Yagul-Mitla World Heritage site in the future;
2. Request the Mexican government, in its capacity as a State Party to the World Heritage Convention, to comply with the 4 requests established in Decision 34COM 8B.42, in which the "Prehistoric Caves of Yagul and Mitla in the Central Valley of Oaxaca " are registered as a world heritage site, in order to integrate and coordinate efforts to achieve the conservation of the universal values of this site;
3. Request the Mexican government to generate capacity-building processes, oriented to those involved in the protection of the site, regarding the guidelines (Operational Guidelines) and commitments for the site. Especially towards the authorities and local people, this means to channel in a strong way the community initiatives for the protection of the site or other conservation measures;
4. Request the Mexican government to promote the coordination of institutions (INAH and CONANP) for the integral and coordinated conservation of the site, promoting protection measures and a biocultural approach; policies aligned and congruent with each other;
5. Raise awareness among the society in general so they can change their current perception regarding the institutions and see them as allies of conservation and not as entities that limit programs or projects (in relation to the requests for permits that some people make to develop activities in the areas of the site or nearby areas such as infrastructure, etc.).

<sup>4</sup> <https://whc.unesco.org/en/list/1352/documents/>

## Conclusion

The damage to the La Pintada cave in January 2021 represents a wake-up call to establish measures to prevent further damage to this world heritage site, through partnerships between civil society, sub-national governments and, other actors related to the protection of the world heritage at the national and international levels. We are still in good time to develop actions positively oriented towards the conservation of the outstanding universal values of this set of caves that shelter important evidence that allows a better understanding of the processes of domestication and agriculture early in America.

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Fig. 6: View of one of the Yagul caves, 2021.

Photo: Alicia Torres Porras



# Canaima National Park: Relentless Mining on the Rise

SOSOrinoco



The year 2020 marked the 58th anniversary of the founding of Canaima National Park, a World Heritage Site (CNP-WHS), celebrated while the park lay under siege by the illegal mining operations inside its boundaries as well as in adjacent areas. According to UNESCO, “Canaima is one of the principal marvels of creation, unique in the world. It constitutes one of the most archaic and best-preserved territories on the planet.” In June of 1962, it was declared a National Park, and was added to the World Heritage List in 1994 (<http://whc.unesco.org/en/list/>).<sup>1</sup>

The following reports, going back to 2018, describe the destruction of more than 1,000 hectares of its ecosystems (see Fig. 1), from which gold is being extracted by means of semi-mechanized techniques that also use the toxic element mercury (Hg).

Mining Area	ha	MiningArea	ha
Campo Alegre	187	Paraitepui	16
Chicharrón_1	93	Rio Amac Abajo	16
San Jose de Guarima	85	Rio Karrao_1	16
Acareden	84	Churun Meru	7
Rio Tirica	73	Kuana	7
Rio Pirma	71	Uriman	6
Caruay	70	Mowak	4
Paraman	49	Muruko	4
Rio Karra_2	45	Wadetey	3
Asapati	41	La Ceiba	3
RioApreme	36	Kamarata	3
Boquini_1	31	Acanan	2
Iworok	21	Anauai	2
Cucurital	21	Aponwao	1
Guacharaca_1	19	Cumaraipa	1
Mure Demu	16	Total	1033

Fig. 1: The extent of illegal mining activity inside CNP, in hectares (ha), based on calculations made by SOSOrinoco (2020) and the investigative team of Correo del Caroní (2020), funded by the Pulitzer Center. Mining operations covering larger areas are represented in red. Note: The area calculations include, and are limited to, surfaces directly affected by extractive activities, plus active and inactive pits and settling ponds, as well as surrounding areas where the vegetation cover has been removed.

These operations also involve some 20 floating factories known as “mining rafts,” which have a devastating effect on the beds of the crystal-clear rivers in the immediate vicinity of well-known Angel Falls, the tallest uninterrupted waterfall in the world (Fig. 2)<sup>2</sup>



Fig. 2: Angel Falls, Canaima World Heritage Site.

Photo: Rodolfo Gerstl

The reality is even worse along the boundaries of CNP-WHS where more than 7,400 hectares are being impacted by the illegal mining operations, as was made evident by the SOSOrinoco (2020) report. The Correo del Caroní report<sup>3</sup> funded by the Pulitzer Center investigated the southeastern sector of CNP-

<sup>1</sup> [http://portal.unesco.org/en/ev.php-URL\\_ID=12572&URL\\_DO=DO\\_TOP-IC&URL\\_SECTION=201.html#:~:text=Parque%20Nacional%20Canaima%3A%20UNESCO&text=Canaima%20es%20una%20de%20las,la%20Lista%20del%20patrimonio%20mundial.](http://portal.unesco.org/en/ev.php-URL_ID=12572&URL_DO=DO_TOP-IC&URL_SECTION=201.html#:~:text=Parque%20Nacional%20Canaima%3A%20UNESCO&text=Canaima%20es%20una%20de%20las,la%20Lista%20del%20patrimonio%20mundial.)

<sup>2</sup> [https://sosorinoco.org/wp-content/uploads/2020/07/CanaimaEnglish\\_PortadaNueva\\_SinA3.pdf](https://sosorinoco.org/wp-content/uploads/2020/07/CanaimaEnglish_PortadaNueva_SinA3.pdf) (SOSOrinoco, July 2018)  
<https://sosorinoco.org/wp-content/uploads/2020/07/Update-CanaimaNP-Report20200427.pdf> (SOSOrinoco, March 2020)  
<https://runrun.es/inicio/393232/canaima-el-paraiso-envenenado-por-el-oro/> [Canaima: Paradise Poisoned by Gold] (Runrunes, November 2019)  
<https://pulitzercenter.org/reporting/gold-mining-devastation-beneath-eyes-roraima-tepuy> (Correo del Caroní, Proavinci and InfoAmazonia, June 2020)  
<https://world-heritage-watch.org/wp-content/uploads/2020/06/WHW-Report-2020.pdf> World Heritage Watch Report 2020. pp. 68-72 (SOSOrinoco, 2020).

<sup>3</sup> <https://pulitzercenter.org/reporting/gold-mining-devastation-beneath-eyes-roraima-tepuy>

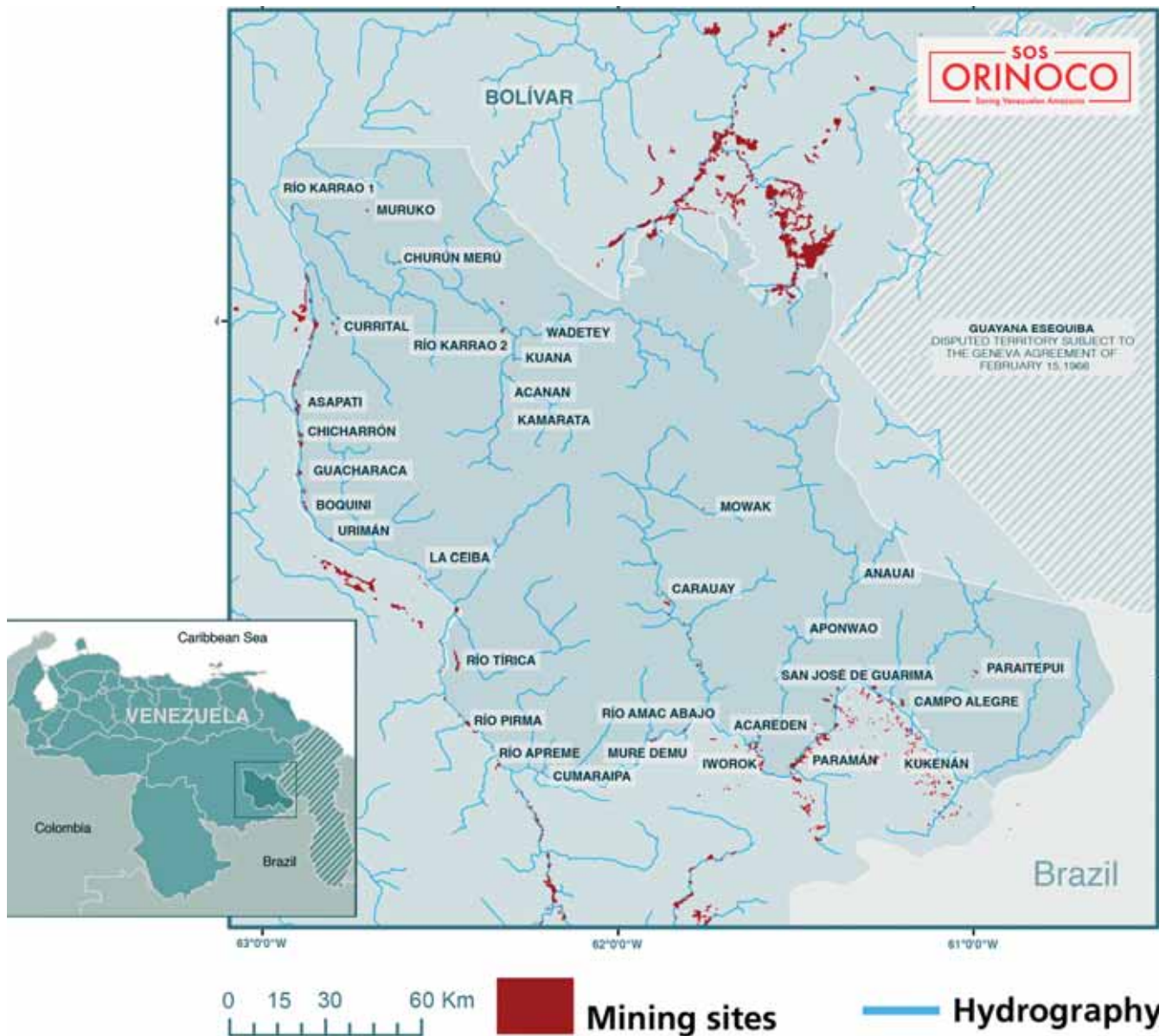


Fig. 3: Mining Sectors within and adjacent to Canaima National Park.

Source: SOSOrinoco

WHS, known as the Gran Sabana, where the largest mines are located, and where there is participation by the Pemón indigenous inhabitants, whose economies had been associated in past years, directly or indirectly, with the flow of tourists who once visited Roraima Tepui and other Gran Sabana attractions. The report identified 7 areas, the most prominent being El Mosquito and Mayen-Macriyen. These two areas have drawn attention as a result of an increase in mining activity there, which now occupies more than 500 hectares (Figs. 3 and 4).

### Mining inside Canaima NP

Canaima National Park is divided into two sectors: The Western (64%) and the Eastern (36%), differentiated from each other by at least two factors: (1) the amount of rainfall and (2) the

Mininig Seetor	ha
Arabopo	6
Chirikaden	23
Mayen / Macriyen	348
Mosquito	179
Rfo Pirma	6
Salva la Patria	31
Salva la Patria / Apoipo	10
Salva la Patria / Surucun	11
Santa Elena	56
Total	670

Fig. 4: Surface area, in hectares (ha), affected by illegal mining activity in the vicinity of CNP, focusing on the Western sector.



continuity of the forests. The Western sector has less rainfall (1,600 to 2,200 mm/year) and its forests are more continuous, while the Eastern sector has greater rainfall (2,200 to 4,000 mm/year) and its forests are distributed in a mosaic pattern, interspersed with savannas, and are more fragmented. The reason for this is the subject of inconclusive scientific debate.

At least 480 hectares of illegal gold mining operations have been detected in the Western sector, where the park boundaries are under increasing pressure emanating from a large mining focus situated outside the national park at Las Claritas-Chibay (along the eastern boundary) and from another large focus of operations at San Salvador de Paúl-Urimán (along the Caroní river boundary). These pressures generate greater threat to the landscape, directly affecting the Caroní River, and threatening the continuity of the forests that had remained relatively unperturbed up until lately thanks to the difficulties in accessing the area. In this sector, it is troublesome to see the degradation of the ecosystem surrounding the table-top mountain mass known as Auyantepuy, the most outstanding icon of CNP-WHS, one that attracts the most tourists, thanks to its waterfalls, particularly Angel Falls, as well its number of species.

It is noteworthy that no Land Management Plan and Use Regulations have yet been implemented to provide better zoning and administration in this Western sector. In any case, this would probably have no effect on the current mining situation, as already existing legislation absolutely prohibits mining activity in any areas designated as national parks; moreover, there is no political will to enforce this. Furthermore, the entire social situation in the region has resulted in the unfortunate disappearance of all scientific activity in one of the planet's most interesting regions for the study of biodiversity, as for instance the summits of the tepui formations of the Guiana Shield.

In the Eastern sector, known as the Gran Sabana, most of the forests are sub-mesothermic montane forests types. These are distributed along the hills and dales of the larger river valleys and constitute the transition between the forests of the highlands and lowlands. In the El Mosquito sector, it was observed that the mining activity (e.g., Arenales) had displaced the woodlands that were once characterized by species having very specialized adaptations, distributed in patches, which suggests that the eradication of the woodlands may be permanent. The soil substratum that facilitates the fixation of plant species has been totally removed, thus there are areas that are now devoid of any vegetation with no likelihood of restoration.

The riparian forests of the Gran Sabana are distributed mainly along the shores and valleys of the Yuruaní, Aponwao and Kukenán rivers and have unique characteristics. Their flora is very peculiar, as many of the species in these forests are not generally found in the other sub-mesothermic forests of Venezuela's Guayana region, where the distribution of these riparian forests is restricted to the Caroní River basin, which means that any ac-

tivity that results in their degradation will also lead to the loss of unique biological communities. Any mining activity along the shores of these rivers constitutes an irreversible assault against Venezuela's and humanity's biological heritage. These are the forests that are under the most pressure. They are fixated in the slightly better soils used by the Pemón people for small-scale farming. Because the region's soils tend to be very poor in nutrients, this also contributes to the transformation of forests into savannas, a process known as savannification (Hernández and Dezzeo, 2004).<sup>4</sup>

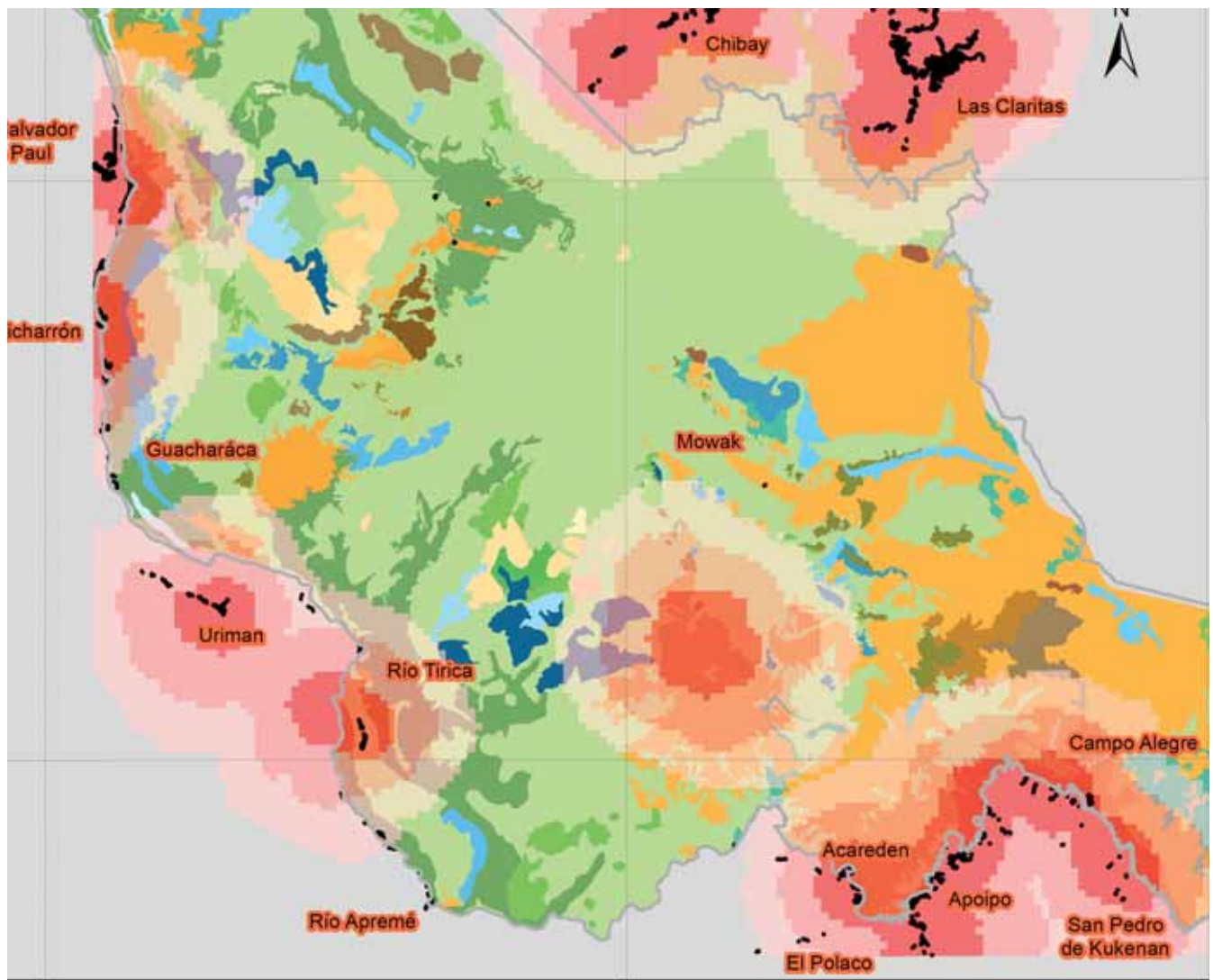
Another ecosystem that is highly vulnerable to the mining operations is found in the *Mauritia flexuosa* palm swamp communities, known locally as morichales. These are major ecological icons of the Gran Sabana and are highly diverse and complex. The morichales are being adversely affected by mining activity at places such as the El Mosquito and Campo Alegre mines, near which one can see isolated remnants of them, into which now run contaminated flows originated in the mines located at higher topographical locations.

Finally, the diagnostic analysis conducted by SOSOrinoco<sup>5</sup> estimates that: a) 7,419 hectares in the CNP-WHS show "high vulnerability" to the mining activity, as these areas consist mainly of potentially vulnerable "sub-montane ombrophilous forests" (SOF); b) 8,935 hectares of the CNP-WHS show "average vulnerability," and again the most likely areas to be affected are also SOF's. This same report estimated that current mining operations on 7,679 hectares along the boundaries of the CNP-WHS in turn are causing 22,481 hectares within the CNP-WHS to become likewise vulnerable (Fig. 5).

The mines continue to operate in an unrestricted manner and are on the rise inside the CNP-WHS. It is evident that the authorities have neither the interest nor the wherewithal to respond effectively to these problems. In recent months, the presence of irregular armed groups has given rise to an increase in violence in the entire region, all related in one way or another to the mining operations, inside the CNP-WHS as well as along its boundaries. The various conflicts between and among these groups, the military and the Pemón people have resulted in homicides, massacres, and the forced migration of the indigenous people into Brazil. Furthermore, there is evidence of possible political pacts between the government and the indigenous leadership aimed at expediting the mining operations in exchange for minimizing the violence and preventing the indigenous territories from being invaded by non-Pemón miners.

4 Hernández, L. and Dezzeo, N. 2004. El fuego en la Gran Sabana. *Interciencia* 29 (8): 409-410.

5 <https://sosorinoco.org/wp-content/uploads/2020/07/Update-Ca-naimaNP-Report20200427.pdf>



#### Legend

- CNP Boundaries
- Gold mines

#### Vulnerability to mercury contamination

- High
- Mid
- Low
- None

#### Vegetation type

- Macrothermal Ombrophile Shrubland
- Mesothermal Ombrophile Shrubland
- Submesothermal Ombrophile Shrubland
- Submesothermal Ombrophile Shrubland and Forest
- Submesothermal Ombrophile Shrubland and Savanna
- Mesothermal Ombrophile Shrubland and Saxicolous Vegetation
- Macrothermal Ombrophile Forest
- Mesothermal Ombrophile Forest
- Submesothermal Ombrophile Forest
- Submesothermal Ombrophile Gallery Forest
- Macrothermal Ombrophile Forest and Shrubland
- Mesothermal Ombrophile Forest and Shrubland
- Submesothermal Ombrophile Forest and Shrubland
- Submesothermal Ombrophile Forest and Barren
- Macrothermal Ombrophile Forest and Shrubland
- Submesothermal Ombrophile Forest and Shrubland

- Submesothermal Ombrophile Forest and Savanna
- Submesothermal Ombrophile Grassland
- Submesothermal Ombrophile Scrubland
- Submesothermal Ombrophile Scrubland and Savanna
- Macrothermal Ombrophile Floodable Savanna
- Submesothermal Ombrophile Savanna
- Submesothermal Ombrophile Floodable Savanna
- Macrothermal Ombrophile Savanna and Shrubland
- Macrothermal Ombrophile Savanna and Gallery
- Mesothermal Ombrophile Savanna and Gallery Forest
- Submesothermal Ombrophile Savanna and Gallery Forest
- Mesothermal Ombrophile Saxicolous Vegetation
- Submesothermal Ombrophile Saxicolous Vegetation
- Mesothermal Ombrophile Saxicolous Vegetation and Shrubland

Fig. 5: Vegetation types and vulnerability to mercury contamination.

Map: SOSOrinoco



The recently published IUCN World Heritage Outlook 3<sup>6</sup> (November 2020) again places Canaima National Park (PNC-WHS) on the list of World Heritage sites that are cause for “Significant Concern,” a category no different from what was assigned in the 2017 report. This strongly suggests that the aforementioned report has been less than compliant with the tenets and objectives of IUCN World Heritage Outlook, which clearly state that: “Based on expert knowledge, IUCN’s World Heritage Outlook is designed to track the state of conservation of all natural World Heritage Sites over time. Implemented by the IUCN World Heritage Programme and IUCN’s World Commission on Protected Areas (WCPA), it aims to provide reliable, transparent and independent information on the present situation and future prospects of natural World Heritage through Conservation Outlook Assessments” (from their own website)

It is our opinion that such has not been the case with Canaima National Park, given that the authors of this latest Outlook report should have had access to all the above-mentioned reports (and we are confident that they did), and logically they could not have concluded that the 2020 status of Canaima was equal or similar to that of 2017. If indeed they had access to these reports, then we are faced with a worrying methodological problem with the Outlook’s assessment, because it is unable to measure the degree of evolution of a situation of “Significant Concern”. Our conclusion is that Outlook has not provided good advice on the real situation of Canaima National Park, a natural World Heritage Site, to UNESCO’s World Heritage Committee. IUCN should have reclassified Canaima’s situation as being “Critical.”

Canaima’s situation has continued to deteriorate, even more so amidst Venezuela’s current humanitarian crisis, and as a result of the Venezuelan State’s policy of openly encouraging more mining activity, totally disregarding its environmental obligations. It is necessary for UNESCO to include PNC-WHS on the List of World Heritage Sites in Danger, as a political action that would motivate the authorities to act in a decisive and assertive way to put an end to mining operations inside the park’s boundaries.

6 <https://portals.iucn.org/library/sites/library/files/documents/2020-035-En.pdf>

# Koutammakou – a World Heritage Property to be Completed

Ibrahim Tchan, Corps des Volontaires Beninois



Koutammakou, the land of the Batammariba, the only UNESCO World Heritage Site in Togo, is a magnificent landscape in the northeast of the country that forms a coherent continuum with that of Benin. In Togo, Koutammakou covers approximately 50,000 hectares and borders Benin for 15 km. The Beninese part of Koutammakou straddles four communes, namely the communes of Boukoubé, Natitingou, Toucountouna and Tangiéta.

The exceptional originality of the land use in perfect harmony with the environment, the culture and the beliefs of the Tamari<sup>1</sup> people as well as the architecture of the „Takienta“<sup>2</sup> house of the Batammariba<sup>3</sup> are witnesses of the richness of the cultural heritage of the African continent. However, the cultural landscape of Koutammakou is undergoing changes due in large part to the evolution of the lifestyle of the communities. This evolution has visible impacts on the traditional dwelling and the landscape in general in both Togo and Benin. This article addresses issues related to the difficulties of management and conservation of the Koutammakou of Togo and the inscription by extension of the Benin part.

## Koutammakou, a living cultural landscape

The Koutammakou site corresponds to the second category of cultural landscapes as defined in the Operational Guidelines for the Implementation of the 1972 World Heritage Convention. In this category, it is considered a living landscape. Indeed, it remains the traditional living environment and history of the Batammariba, hence the interest that should be given to this site.

The *Takienta*, the main cultural element of the Koutammakou, is a two-story dwelling unique in the world and built entirely of a wide range of local materials. It is original and elaborate and is in perfect correspondence with the culture and beliefs of its inhabitants. The construction of this dwelling allows a judi-



Fig. 1: Approximate indication of Koutammakou on both sides of the border of Togo and Benin.

Map: mapsofworld.com / WHW

cious and rational use of eco-materials still called „biosourced materials“ available locally. These materials are of natural origin (water, earth, termite mound), vegetable (wood, fruits of the *nére* and *karité*, straw, *raffia*, *kenaf*, millet stem) and animal (cow dung). During construction, everything is designed to adapt to the intrinsic qualities of the raw materials, or to minimize the quantities used, or to avoid or delay possible degradation, and thus facilitate maintenance. Associated with the traditional *Takienta* dwelling is the natural landscape consisting mainly of galleries and groves that are used for community ceremonies. These groves are home to spirits or forces of the earth that impose rules for hunting and exploitation of the land on humans, decoded by diviners. The violation of these rules provokes their vengeance in the form of calamities such as tornadoes or drought. The link is therefore close between

1 Tamari: Adjective qualifying that which is specific to the otammari culture. Tamari sometimes replaces the term Ditammari to indicate the language of the Batammariba.

2 Takienta or Takyiènta: Fortified housing unit.

3 Batammariba: Inhabitants of Koutammakou, sometimes also called Somba or Tamberma.



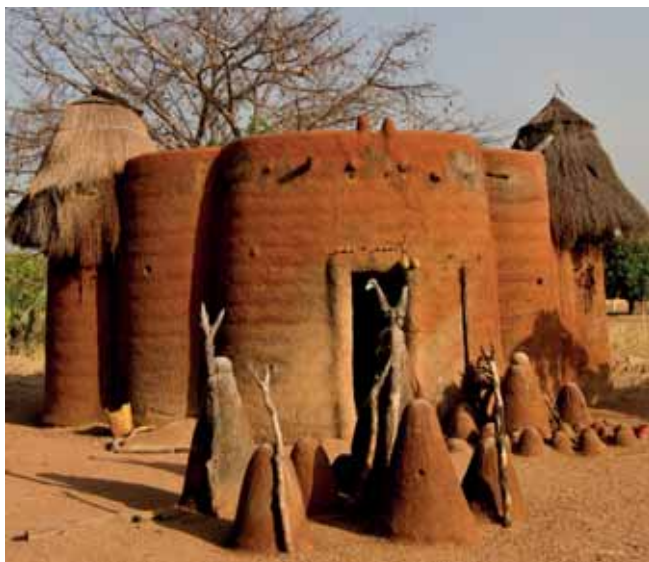


Fig. 2: A typical Takienta.

Photo: Ibrahim Tchan

the dwelling of the living, which is also that of their dead, and the territories reserved for the spirits of the earth. Moreover, the natural landscape shelters the ritual ceremonies of passage of social class but also spaces of burial of the deceased of the community. It is for these reasons that despite the worldwide phenomenon of deforestation and desertification, these places remain strongly preserved in Otammari<sup>4</sup> country.



Fig. 3: Rural scene in Koutammakou.

Photo: Ibrahim Tchan

The initiations of the *Dikuntri* (for girls) and the *Difuani* (for boys) which mark the passage from adolescence to adulthood take place every four years. The *Takienta* plays an important role in the initiatory journey marking the passage from adolescence to adulthood. These initiations are almost the only ones among sub-Saharan societies to have retained such vitality. The female rite of „*Dikuntri*“ is one of the last female initiation rites to be celebrated in its entirety and with fervor. The Batammariba reconnect with the spirits of their dead and of the earth through these great ceremonies which, it should be remembered, are closely linked to the architecture of their „*Takienta*“, with its complex symbolism, and which truly represent temples.

## Koutammakou, a threatened cultural landscape

The Koutammakou landscape is undergoing changes due in large part to the evolution of the communities' way of life. This evolution has visible impacts on the traditional habitat and the landscape in general. In addition to the way of life, climate change also makes the cultural heritage of Koutammakou increasingly vulnerable. Notwithstanding this situation, the elements of the material and immaterial culture of the Otammari civilization remain on the whole intact. For example, on the natural level, the Koutammakou cultural landscape still retains its integrity as evidenced by the use of groves and sacred forests for initiation ceremonies for young boys and girls and for funeral rites. That said, *Tamberma*<sup>5</sup> architecture is currently a disappearing dwelling in both Togo and northwest Benin due to modernization, deforestation, socio-economic conditions, and climatic variations. New architectural forms inspired by modern forms of construction are being introduced, consisting of rectangular huts with sheet metal roofs. Thus, the younger generations are abandoning the traditional *Takienta* in favor of more modern constructions. These modern constructions are a serious threat to the conservation of the *Takienta* for future generations. Building a *Takienta* requires a very demanding traditional know-how which is transmitted during construction sites which are increasingly rare. Moreover, building a *Takienta* requires a huge mobilization of material and human means based on the legendary African solidarity. Unfortunately, this is less and less present.



Fig. 4: A view of the wide Koutammakou landscape. Note the many rectangular buildings with sheet metal roofs.

Photo: Ibrahim Tchan

## The Koutammakou, an unfinished world heritage status

The inscription of Koutammakou by Togo on the UNESCO World Heritage List confers on this site a special protection with new conservation and management mechanisms that have been added to the traditional conservation mechanisms estab-

4 Otammari is the Singular of Batammariba: an inhabitant of Koutammakou.

5 Tamberma is sometimes used as a noun to qualify the Batammariba (the tambermas) or as an adjective qualifying what belongs to Koutammakou, "Tamberma country", "Tamberma architecture".

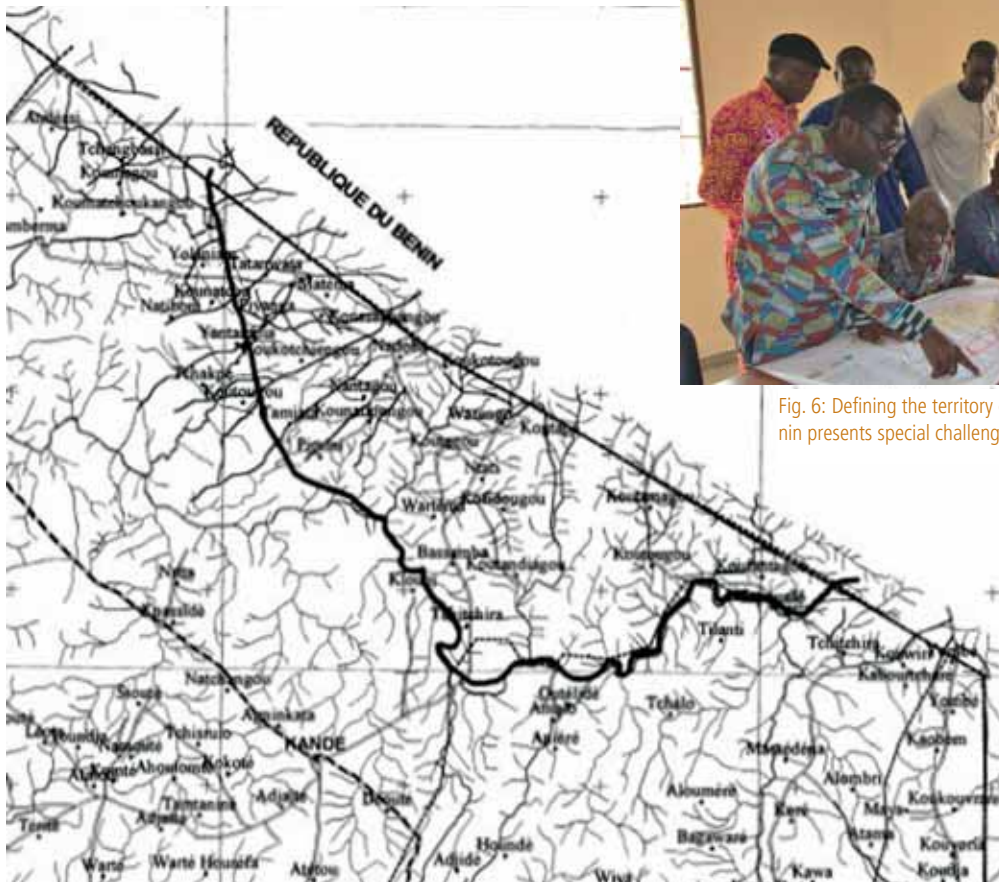


Fig. 5: The Koutammakou area in Togo as inscribed in the WH List.

lished by the holders of the listed heritage. The question of the management of the Koutammakou site has therefore become very complex. At its 43rd session, the World Heritage Committee in its Decision 43 COM 7B.112 assessed the state of conservation of the Koutammakou site. This decision addresses issues related to the difficulties of management and conservation of Koutammakou, including the absence of an operational management plan for the site, the lack of human, material and financial resources, including the legal and legislative framework, and the appearance of new forms of construction that modify the landscape of the site. These problems are still present at Koutammakou despite the multiple efforts of the Cultural Heritage Department of Togo through the Service de Conservation et de Promotion du Koutammakou.

In Benin, on the other hand, the process of inscription by extension of the Koutammakou site has just begun. It is led by the Directorate of Cultural Heritage of Benin and its partners. A conservation and management plan (2021–2025) for the Koutammakou of Benin has been drawn up and validated by all stakeholders. It should be recalled that the Koutammakou of Benin has several types of traditional *Takienta* dwellings unlike that of Togo, hence the need for its registration. This registration will help to erase the false colonial borders established between the Tammari people of Benin and Togo, and strengthen the conservation system of Koutammakou.



Fig. 6: Defining the territory of the future Koutammakou WH Site in Benin presents special challenges.

Photo: KPLAI Afiavi Raymonde

The process continues with the support of the Beninese Volunteer Corps. This civil society organization has received support from the World Monument Fund to implement the Koutammakou Cultural Landscape Preservation Project, Benin and Togo. The activities included in this project are:

the inventory and mapping of the cultural elements of Koutammakou Benin, its perimeter and buffer zone, the establishment of local committees of alert and monitoring of Koutammakou (Benin and Togo), the rehabilitation of Sikien<sup>6</sup> (Benin and Togo), the reconstitution of the vegetation cover by planting trees on the site of Koutammakou (Benin and Togo) and the facilitation of educational workshops in schools of Koutammakou (Benin and Togo).

The organization is looking for additional funding to carry out actions that aim to limit the negative pressures exerted by the populations on Koutammakou by boosting tourism and diversifying Income-generating activities for the benefit of local communities. These activities will focus on local crafts (made in Koutammakou), animal husbandry, agro-ecology, agribusiness. Empowering communities will maintain Koutammakou for current and future generations.

UNESCO will require States Parties (Benin and Togo) to draw up and put into practice a plan for the management of risks and disasters in Koutammakou managed by local communities. It is also urgent that in-depth studies be carried out on the resilience of Koutammakou, and especially *Takienta*, in the face of climate change.

6 Sikien or Sikyien, is the plural of Takienta, fortified family dwelling units.

Map: UNESCO



# UNESCO Must Protect Present and Future World Heritage Sites From Oil and Gas Pollution in Africa's Eden

**Andy Gheorghiu, Saving Okavango's Unique Life (SOUL) Alliance**



Fig. 1: The Kavango Zambezi Transfrontier Conservation Area.

Source: <https://maps.ppf.org.za/arcgis/apps/webappviewer/index.html?id=3fa4410cc61b466ca5061a9c7ad17d8f> / <https://www.kavangozambezi.org/en/maps>

The Kavango Zambezi Transfrontier Conservation Area (KAZA) is the world's largest trans-boundary conservation area. It extends over 520,000 square km – the size of France and the UK combined – across the five countries of Angola, Botswana, Namibia, Zambia and Zimbabwe, serving also as a peace park between these countries who share political differences and a troubled history.

## ReconAfrica's petroleum drilling plans

But now an envisaged fossil fuel extraction project in the midst of KAZA threatens a unique ecosystem and UNESCO World Heritage sites as well as the livelihood of indigenous people who happen to live in a huge area which was licensed for petroleum exploration and production.<sup>1</sup> ReconAfrica, a Canadian company whose Vancouver office can no longer be found on

their website<sup>2</sup>, was granted licenses in Namibia and Botswana of approximately 35,000 km<sup>2</sup> or 8.5 million acres to explore for oil and gas in the so-called Kavango Basin.<sup>3</sup>

The company has started first exploratory drilling in Namibia and plans to do more seismic surveys for additional drilling. The petroleum agreement gives ReconAfrica the exclusive right to obtain a 25-year production license (with a 10-year renewal option). The state-owned company Namcor holds an interest of 10 % in the license. In Botswana, the company holds the right to enter into a 25-year production licence with a 20-year renewal period. In a joint press release published together with the Namibian Ministry of Mines on April 15, 2021, ReconAfrica announced that the data from the first of a three well drilling program provided evidence of a working petroleum system in the Kavango Basin.<sup>4</sup>

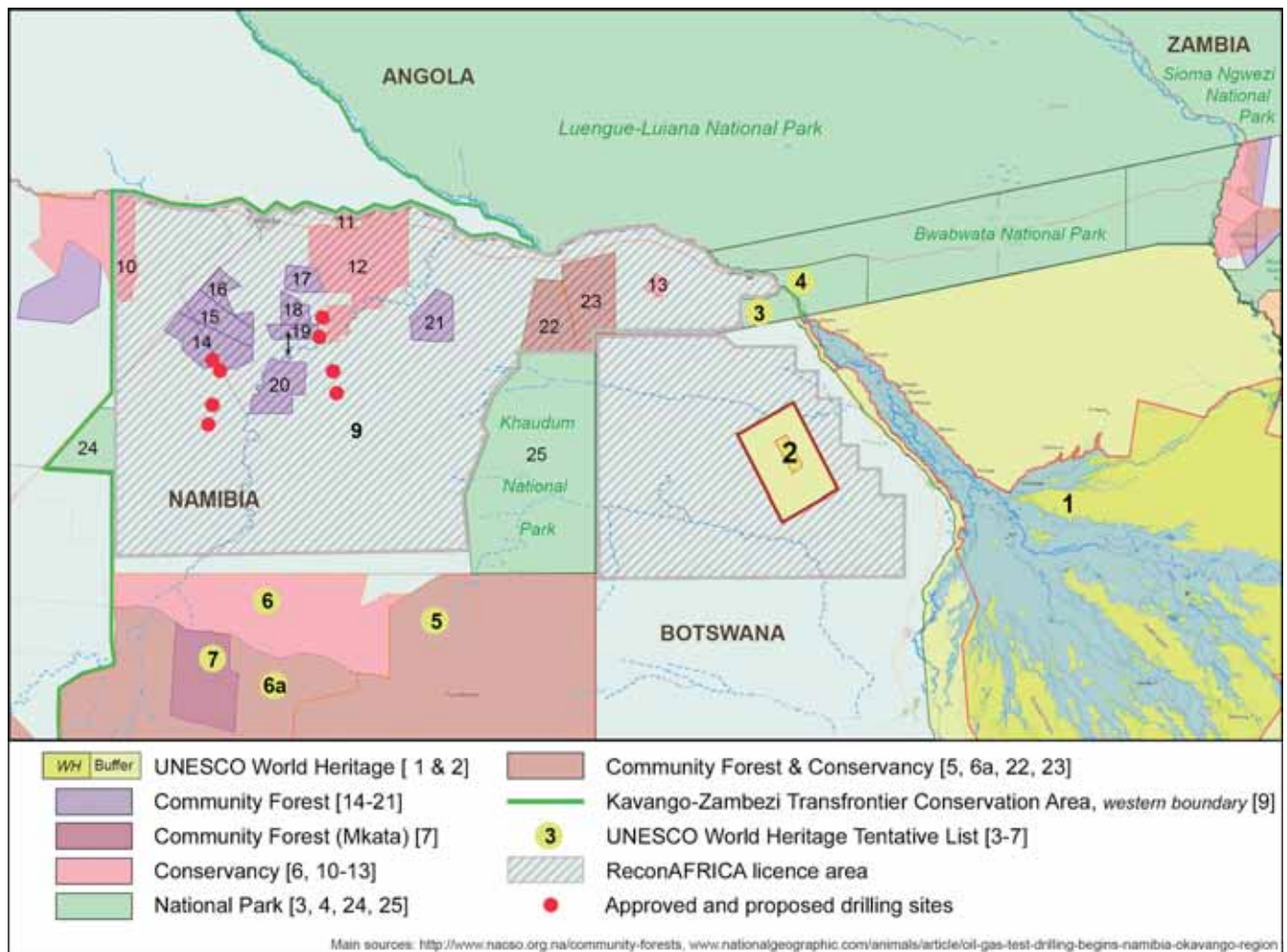
### World Heritage – related areas in the vicinity of the ReconAfrica concession

ReconAfrica's permit area in northeastern Namibia and north-western Botswana falls wholly within the boundaries of the KAZA. In Namibia the concession includes areas on Namibia's UNESCO Tentative List for future World Heritage inscription – including the Okavango River and two cultural sites sacred to San indigenous communities.<sup>5</sup> The eastern boundary of ReconAfrica's permit area in northwestern Botswana runs along the Okavango Delta UNESCO World Heritage site, Ramsar site and

Key Biodiversity Area, one of the most precious ecosystems in the world.

### Tsodilo Hills carve-out is a first good step forward

On December 21, 2020, UNESCO announced that it is vigilant of potential impacts of oil and gas exploration in Namibia and Botswana on the Tsodilo and Okavango Delta World Heritage properties.<sup>6</sup> On January 5, 2021, Botswana and ReconAfrica announced that the exploration license will be amended to ex-



# (map)	Name	Country	UNESCO name	UNESCO status	Affected zones
1	Okavango Delta	Botswana	Okavango Delta	inscribed	Inscribed site, wider setting
2	Tsodilo	Botswana	Tsodilo	Inscribed	wider setting
3	Bwabwata NP (Mahango core area)	Namibia	Okavango Delta	Tentative List	buffer zone (likely)
4	Bwabwata NP (Buffalo core area)	Namibia	Okavango Delta	Tentative List	buffer zone (potentially)
5	Nyae Nyae Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	buffer zone (potentially) or wider setting
6	N#ā-Jaqua Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	
6a	N#ā-Jaqua Conservancy	Namibia	Sān Living Cultural Landscape	Tentative List	
7	Mkata Community Forests	Namibia	Sān Living Cultural Landscape	Tentative List	

Fig. 2: ReconAfrica's drilling license area and Protected Areas of the region.

Map: Martin Lenk



clude the Tsodilo Hills area. This turn of events shows that the influence and involvement of UNESCO is crucial. The fact that the proposed oil and gas development – over an envisaged lifetime of at least 25 years – risks having a huge and irreparable detrimental impact on inscribed and future world heritage sites requires UNESCO’s further engagement with all relevant governments on the issue.

### ReconAfrica’s shale development and fracking plans

ReconAfrica has constantly and repeatedly highlighted that their main target are possible shale resources in the Kavango basin. Any so-called conventional resources (those exploitable by drilling) will be merely a by-catch. This is also clearly outlined by the presentation given by the founder of ReconAfrica, Craig Steinke, in May 2020<sup>7</sup>, and by the fact that the company has hired – amongst other shale experts – the “father of modern-day fracking”, Nick Steinsberger.<sup>8</sup> According to ReconAfrica’s May 2020 report “the initial target is an unconventional play in the lower Permian aged Karoo shales”.

ReconAfrica also confirms the need for fracking operations in its July 2020 report where the company compares the Kavango Basin with the Karoo / Permian Whitehill Basin of South Africa.<sup>9</sup> In the same report, Recon is confident to obtain access to wa-

ter over the envisaged production period of at least 25 years – although they are operating in a very arid area.

More than a decade of large-scale use of fracking has shown how harmful and destructive this extraction process can be. There are numerous proven risks and impacts related to the development of fracking projects, such as industrialization of former rural areas, excessive freshwater consumption, heavy water and soil contamination, public health impacts and a significant contribution to global warming mostly through methane emissions.<sup>10</sup>

However, with growing public opposition, the company now denounces the idea that fracking will play a role in the extraction of the targeted fossil fuels. Even without fracking, however, it is clear that a step-by-step industrialisation of an almost untouched landscape will be the consequence of oil and gas exploitation in the licensed areas. This process will require a huge amount of fresh water in a vast water-deficient region.

The only sources of water upon which communities can depend in the area are groundwater and the Kavango/Okavango River and its tributaries. The Okavango river is the sole inflow into the Okavango Delta with its delicate ecological balance of inflow of water, evaporation and biodiversity. This unique hydrological regime is a key reason for its World Heritage designation and Outstanding Universal Value. A deterioration of the quantity and quality of water flowing into the Delta will have severe negative impacts, and will violate Namibia’s and Botswana’s obligation to the world community under the World Heritage Convention.

One of the tributaries of the Kavango/Okavango River is the Omatako River which flows through ReconAfrica’s license area before joining the Kavango/Okavango River and eventually empties in the Okavango Delta World Heritage (see Fig. 3). Hence, any pollution of the Omatako River from ReconAfrica’s activities will have a direct negative impact on the flora and fauna of the Okavango Delta.

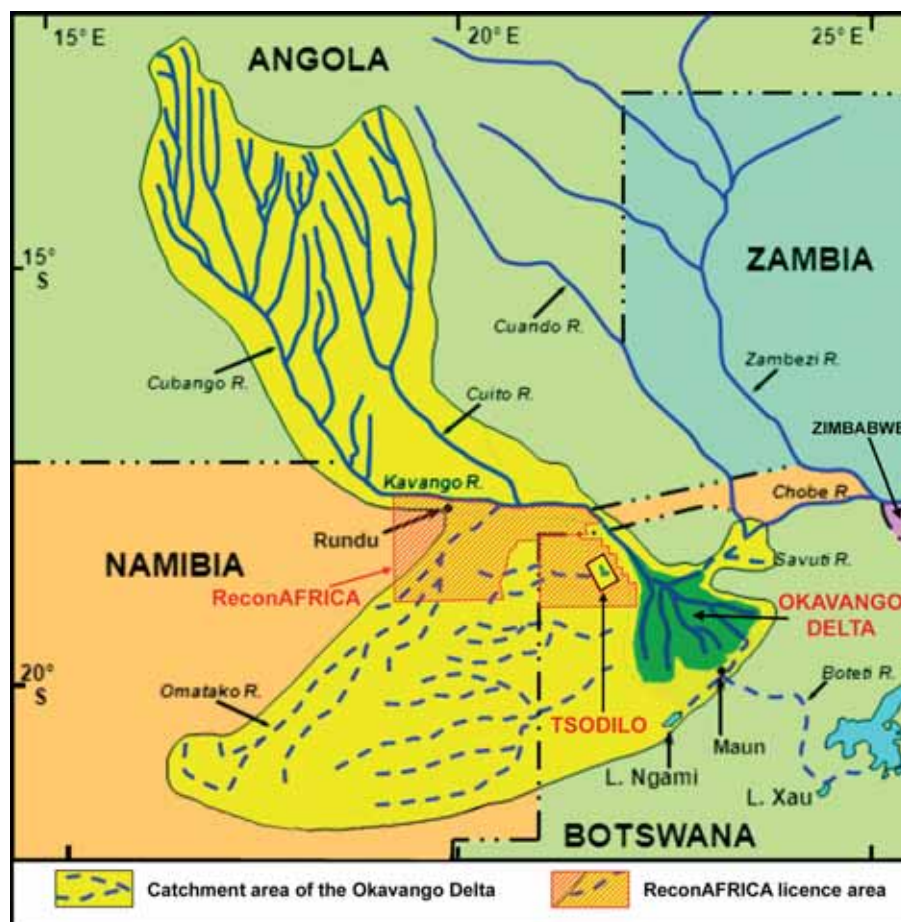


Fig. 3: The ReconAfrica oil and gas license area lies mostly within the Kavango/Okavango water catchment area. All of its waters end up in the Okavango Delta World Heritage Site. Map: Martin Lenk

According to an article published by National Geographic on May 11, 2021, the company is operating without a water permit and is also disposing wastewater of its first drill site in an unlined pit without permits<sup>11</sup> (see Fig. 4). Official sources confirmed that.<sup>12</sup> In addition, the company ignores concerns about possible impacts of its exploration and drilling on water supplies of the indigenous communities, wildlife and public health.



Fig. 4: ReconAfrica's first oil rig in operation in Kawe, February 2021.

Photo: ICUC Productions

In the meantime, local concerns rise about the negative impacts of ReconAfrica's activities. Fridays for Future Namibia, Frack Free Namibia and Safari Lodge owners, supported by celebrity actor Leonardo DiCaprio, have joined the indigenous San people of the region to stop "Namibia's Carbon Gigabomb" which would essentially thwart any attempts by Namibia to meet its commitments under the Paris Climate Accord.



Fig. 5: Young demonstrators took to the streets of Windhoek, Namibia for a Save the Okavango Delta protest in February.

Photo: Lisa Ossenbrink / Al Jazeera

## Strategic Environmental Assessment and moratorium on current exploration phase

To assess the cumulative impacts of ReconAfrica's plans in the Kavango basin, a transboundary Strategic Environmental Assessment is required. The need for this is amplified by the fact that – most likely influenced by the development in Namibia and Botswana – Angola recently revoked its oil and gas drilling ban in the Kavango Basin.<sup>13</sup>

The Namibian Ministry of Health and Social Services recently signed an agreement with the Vienna-based International Atomic Energy Agency to assess how climate change impacts Namibia's groundwater resources.<sup>14</sup> A moratorium on the exploration phase (including seismic surveys) should be decreed until the results of this project – called "*Assessing the impact of climate change and variability on groundwater resources in major aquifers in Namibia*" – have been provided and properly assessed. It is a surprise that a nuclear agency in Europe has been commissioned with this task when a much better-qualified UN Agency, the UN Environment Program (UNEP), is available with its headquarters in nearby Nairobi.

UNESCO should also urge Namibia that all World Heritage sites and those on its Tentative List be excluded from any prospecting and exploration of fossil fuels.

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# Komodo National Park: The Only Home of Komodo Dragons in Peril

Wahana Lingkungan Hidup Indonesia (Friends of the Earth Indonesia)  
Sunspirit for Justice and Peace



Komodo National Park (KNP) is the natural habitat for Komodo dragons (*Varanus komodoensis*), the world's largest surviving lizard with only 3,022 specimens remaining in the habitat. The park provides refuge for other notable terrestrial and critically endangered species, and it is also the home of the *Ata Modo* and *Ata Bajo* indigenous peoples who have dwelled in the area for centuries. Located in Manggarai Barat District, Flores, East Nusa Tenggara Province, Eastern Indonesia, Komodo NP is an archipelago region consisting of three main islands - Komodo, Rinca and Padar – and numerous small islands. In 1977, UNESCO recognized Komodo, Rinca and Padar Island as a "Man and Biosphere Reserve". In 1991, UNESCO declared Komodo National Park (KNP) as a World Heritage site for its superlative natural beauty, the Komodo dragon, marine and terrestrial biodiversity.



Fig. 1: Komodo Dragon (*Varanus komodoensis*).

Photo: WALHI NTT, 2021



Fig. 2: The daily life of Ata Modo indigenous community in Komodo Village, Komodo Island, 2021.

Photo: WALHI NTT

Today, KNP is facing threats that will directly harm the Komodo ecosystem and the existence of the indigenous peoples who live in the park. In the past two decades, mass tourism and deer smuggling put the sustainability of ecosystems in KNP at a higher risk. The government, however, has exacerbated conditions in the park by pushing tourism investment.

## Threats and problematic policies facing Komodo National Park

Since the establishment of Labuan Bajo<sup>1</sup> as one of 10 national primary destinations which the government is billing as the "New Bali" in 2015, tourism development has changed from community-based to industry. To that end, President Jokowi's administration then issued a Presidential Decree in 2019 to include KNP and the surrounding area in the National Strategic Tourism Areas (KSPN). Through the Decree, KNP is targeted as the new epicenter of tourism investment in Flores island.

Under this new design, the government gears up for investment projects inside the park. There are three out of seven companies that have been granted permits by the government. Komodo Island, the land of the *Ata Modo*, will be specifically designated as a super premium tourism zone with an entrance fee of US\$ 1,000. In 2014, the government granted permits for PT Komodo Wildlife Ecotourism (PT KWE) to manage a total of 151,94 ha in Long Liang and a total of 274,13 ha on Padar island. The government also is in the process of granting permits to PT Flobamora, a provincially-owned company, to build an exclusive resort on Komodo Island.

According to leaked meeting notes between the governor of East Nusa Tenggara Province and the KNP Office on July 23, 2019, the *Ata Modo* were to be relocated to Rinca island to support the project.<sup>2</sup> However, this plan and development have received waves of rejection by the *Ata Modo* community as it would put them at disadvantage. Before the government designated the area to be a National Park in 1980, the local com-

1 Labuan Bajo is the capital city of West Manggarai, East Nusa Tenggara, which is also the entrance to Komodo National Park

2 Tempo Investigation "Berebut Komodo" dated January 02, 2021.

munity voluntarily gave the land of their settlement to the government for conservation purposes. Now their land is given to PT KWE for tourism purposes.



Fig. 3: Ata Modo protesting against their removal from Komodo in 2019

Photo: [www.portalntt.com/2000-warga-pulau-komodo-memilih-mati-daripada-direlokasi/](http://www.portalntt.com/2000-warga-pulau-komodo-memilih-mati-daripada-direlokasi/)

In 2015, the government granted permits to PT Sagara Komodo Lestari for a total area of 22,1 ha for the development of a Jurassic Park for massive tourism on Rinca island. On Tatawa island, the government issued permits on April 24, 2020 to PT Synergindo Niagatama for developing underwater tourism business in a total concession area of 15,32 ha (see Fig. 4).

All of these permits for companies were granted after the government changed the zoning of the Park in 2012. According to Decree No. 65/Kpts/DJ-5/2001 of the Directorate General of Natural Resources and Ecosystem Conservation on the zoning system of KNP, issued in 2001, Padar island only consisted of a core zone and wilderness zone. However, after the Ministry of Environment and Forestry issued Decree No. SK.21/IV-SET/2012, 303,9 ha of wilderness zone in Padar Island were converted into utilization zones. The same happened on



Fig. 5: Construction process of the Jurassic Park still continuing on Loh Buaya, Rinca island, 2021.

Photo: WALHI NTT

Tatawa island. According to the 2001 Decree, the whole island was included in the wilderness zone, but the 2012 Decree converted 20,944 ha to be utilized for land tourism. Still part of the ambitious project, the government also plans to change the conservation status of Muang island and Bero/Rohtang island, two islets located between Rinca and Flores island which are included in the core and wilderness zones, and are respectively the natural habitat of Turtle and Yellow-Crested Cockatoo. Under this new scheme, the government plans to manage the islets as part of Tana Mori Special Economic Zone that covers an area of 560 ha.

The zoning has narrowed the fishing area even further and caused criminalization and intimidation of some indigenous people. Due to the failure to communicate the new zoning system, since 2012 at least 36 fishermen have been intimidated for entering the wrong zone, and one person was put into jail for entering the wilderness zone.



Fig. 4: Tourism concessions in Komodo NP.

Graphic: Sunspirit for Justice and Peace

In addition, the zoning policy directly impacts the indigenous peoples who mainly base their livelihood on maritime resources. They can only access two zones of the sea, the Traditional Nautical Use of 17,308 ha (since 2020 part of the renamed Local Community Traditional Zone), and the Pelagic Use / Traditional Pelagic Zone of 59,601 ha but requires fishermen to share it with tourism activities.



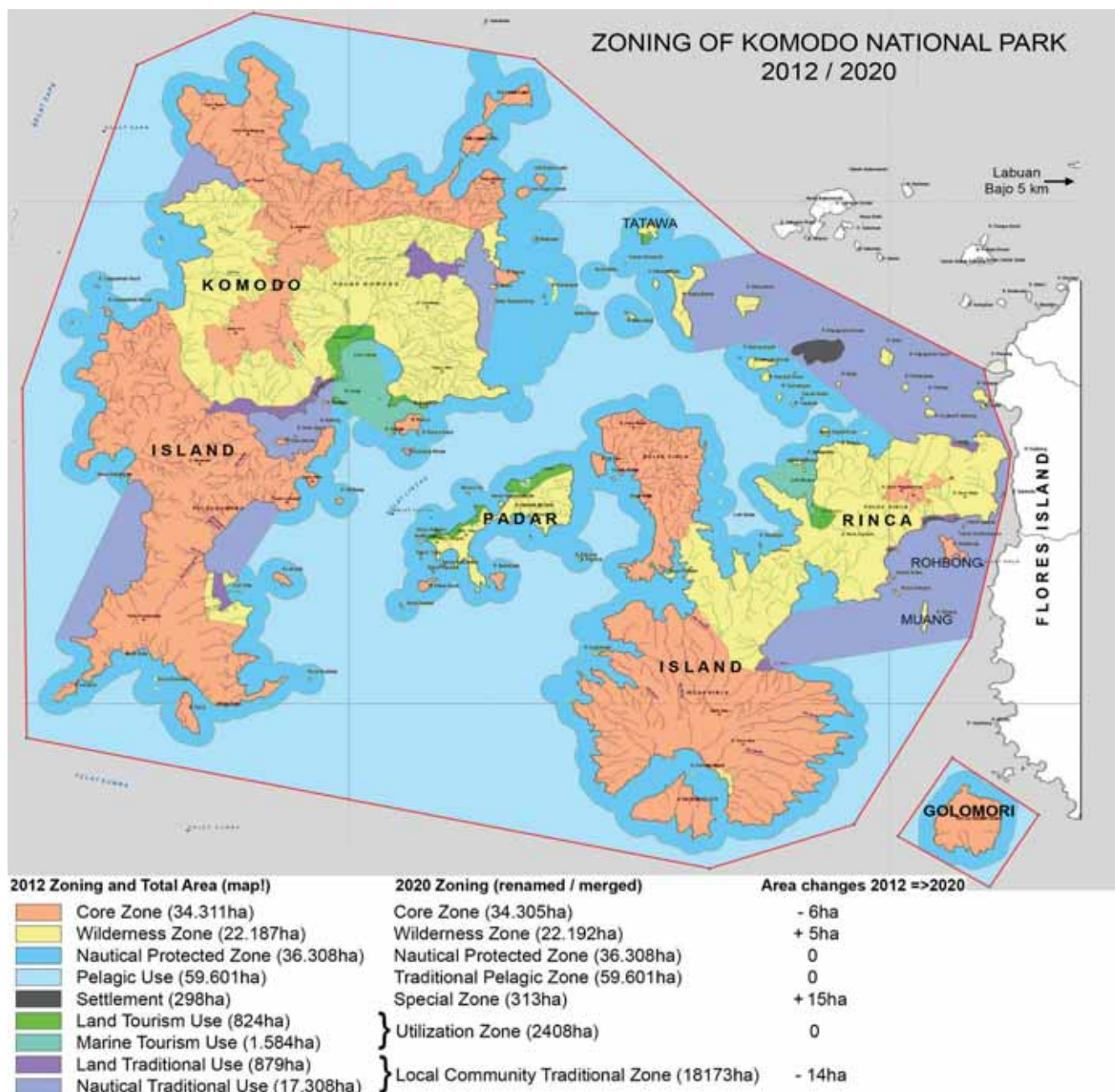


Fig. 6: Zoning Map of Komodo National Park.

Map: Martin Lenk

**Zoning explanation of Komodo National Park\***

Zoning System	Designation	
2012	2020	
Core Zone	Core Zone	Extremely and thoroughly protected area. Any change and intervention by human activity is strictly prohibited, except activities pertaining to research.
Wilderness Zone	Wilderness Zone	Any human activity is prohibited, as mentioned in the explanation about the core zone, except limited tourism activity.
Nautical Protection Zone	Nautical Protection Zone	Any activity involving sea product exploitation is prohibited in the water protection zone. The only allowed activities are those of limited nature tourism.
Land Tourism Utilization Zone.	Utilization Zone.	Intensively used for nature tourism activities.
Water Tourism Utilization Zone		
Land Traditional Utilization Zone	Local Community Traditional Zone	The zone is utilized to accommodate the basic needs of the native residents. However, the land utilization in this zone requires a special permit from the head of the Komodo National Park. Native people are allowed to exploit the sea only if they use eco-friendly technology, such as a fishing rod.
Nautical Traditional Utilization Zone		
Settlement	Special Zone	The zone is used for settlements for native residents. The ruling is based on the special regulation issued by the Komodo National Park and the local/regional administration.
Pelagic Use	Traditional Pelagic Zone	People are free to fish or exploit a variety of sea products in which the exploitation method is not limited only to the usage of eco-friendly technology. The zone is also available for any tourism activities.

\* Source: 2012 Decree and 2020 Decree documents concerning the zoning of Komodo National Park



Fig. 7: Local fishermen in Komodo island collectively lowering the net to catch fish as fishing is the main livelihood that supports the life of the people.

Photo: Local community

In order to ensure a smooth process of investment in the National Park, the government keeps rearranging the zones of the park. On November 6, 2020, the Ministry of Environment and Forestry issued another Decree concerning zoning of KNP, noting that several zones in the 2012 Decree are not in accordance with its designation and are no longer relevant for the needs and external and internal dynamics of the management of KNP.<sup>3</sup> In the 2020 Decree, the zones are narrowed down from nine to seven zones (Fig. 6). Even though the size of KNP in both the 2012 and 2020 zoning remain the same, 173,300 ha, there is contradictory data in the document and map of the 2012 zoning system. In the Decree document of 2012 the total accumulated area of the park is 218,205 ha whereas in the map the size of the park is 173,300 ha.

Comparatively with the new zoning in 2020, the wilderness zone which was recorded in the 2012 zoning documentation covered an area of 66,921 ha while in the 2020 zoning document, the wilderness zone covers a total of 22,192 ha, resulting in a loss of 44,905 ha wilderness zone which is however not supported by the map. The property which was inscribed as a National Park in 1980 and a World Heritage site in 1991 covered an area of 219,322 ha<sup>4</sup>. The loss of 44,905 ha raises a question about the official size of the national park (see Annex).

Alarmingly, the Ministry of Environment and Forestry, who is supposed to be the main guardian of the Park, excluded the obligation to conduct Environmental Impact Assessments (EIA)<sup>5</sup> when developing infrastructure in the park. According to the Ministry, companies are not obliged to prepare EIAs because the development is already listed in the document on environ-

mental management and environmental monitoring efforts (UKL-UPL) for protected areas. This alibi could be used to enable development in other protected areas, too. This exception also violates the principles of sustainable development as it neglects the significant assessment concerning the impacts on the social, economic and environmental aspects.

The negative impacts resulting from the expansion of tourism development that ignores protection and conservation will continue and expand in the future. For instance, in 2009-2010, there was a surge of visitors from 36,000 to 45,000, which grew to 107,000 in 2016 with a majority of foreigners. This shows that infrastructure development leads to a proportional increase of visits. Despite the positive effect on state income, it will endanger the preservation of Komodo dragons and their habitats. The inevitable exposure to human activities, especially ecotourism, influences phenotypic and demographic aspects of the Komodo dragon's ecology. These protected species might lose their hunting instincts due to dependence on food from humans in tourism activities.<sup>6</sup> Furthermore, critically endangered endemic birds which inhabit the island will also become more vulnerable to the noise produced by human activities.

In addition, Komodo dragons are predicted to be extinct by 2050 due to climate change impacts on small islands if no quick mitigation efforts are taken in the park and its surroundings.<sup>7</sup> Since 2000, Komodo dragons have been extinct on Padar Island.<sup>8</sup> One of the triggers for the extinction lies in the Komodo dragon food chain. According to WALHI's records, from 2018-2019 there has been rampant smuggling of Komodo dragon prey such as deer. At the end of 2020, the West Manggarai Police managed to thwart the smuggling of 300 kg of dried venison which is equivalent to 20 deer. This should be an alarm for the government to make vigorous efforts to protect Komodo dragons from extinction.

## Key Recommendations

The problematic policies issued by the government in the management of KNP certainly violate the essence of the park as a conservation area. In efforts to protect KNP and its species from extinction, restore their habitats, and sustain the livelihoods of its indigenous peoples, we call on the Indonesian government to implement the following recommendations:

1. Revoke the concessions granted for private and state companies, and thoroughly evaluate the planned development inside Komodo National Park.

3 Decree of the Directorate General of Natural Resources and Ecosystem Conservation No. SK.212/KSDAE/SET.3/KSA.0/11/2020

4 The 1991 IUCN Evaluation Report document page 21

5 Ministerial Decree No. S.576/KSDAE/KK/KSA.1/7/2020 concerning "The exception of EIA for the construction of tourism infrastructure in Komodo National Park"

6 Ardiantiono et al (2018) Effect of Human Activities on Komodo Dragons in Komodo National Park.

7 Alice R. Jones et al (2020) Identifying island safe havens to prevent the extinction of the World's largest lizard from global warming.

8 <https://regional.kompas.com/read/2019/08/16/18385061/cerita-punahn-ya-komodo-di-pulau-padar-perburuan-liar-hingga-pembakaran-lahan>



2. Prioritize the interest of science in conservation and the protection of Komodo dragons from extinction.
3. Prioritize sustainable community-based tourism and conservation.
4. Revoke the conversion of the core zone and wilderness zone to become a special utilization zone for investment purposes.
5. Restore the marine culture of the Indigenous peoples which has slowly disappeared, and give up plans to relocate the indigenous peoples from their rightful home.

We call on the UNESCO World Heritage Committee and IUCN to consider the following recommendations:

1. Call on the Indonesian government to protect Komodo National Park from harmful development projects by suspending or canceling permits within the Komodo National Park.
2. Call on the State Party of Indonesia to require EIAs in project mechanisms for conservation measures.
3. Call on national and international financial institutions not to support or fund any development projects in Komodo National Park that will directly or indirectly harm the Komodo National Park.
4. Request the State Party of Indonesia to submit to them, according to §172 of the Operational Guidelines to the WH Convention, any plans for projects in or near KNP in order to allow UNESCO/IUCN an assessment whether these projects, if implemented, would adversely affect the Outstanding Universal Value of the property.
5. Request the State Party of Indonesia to invite a UNESCO/IUCN Reactive Monitoring Mission with a view to establish whether the property should be inscribed in the List of World Heritage in Danger.

## Annex

## Komodo National Park: An Embarrassing Tale of Maps and Territories

Martin Lenk and Stephan Doempke, World Heritage Watch

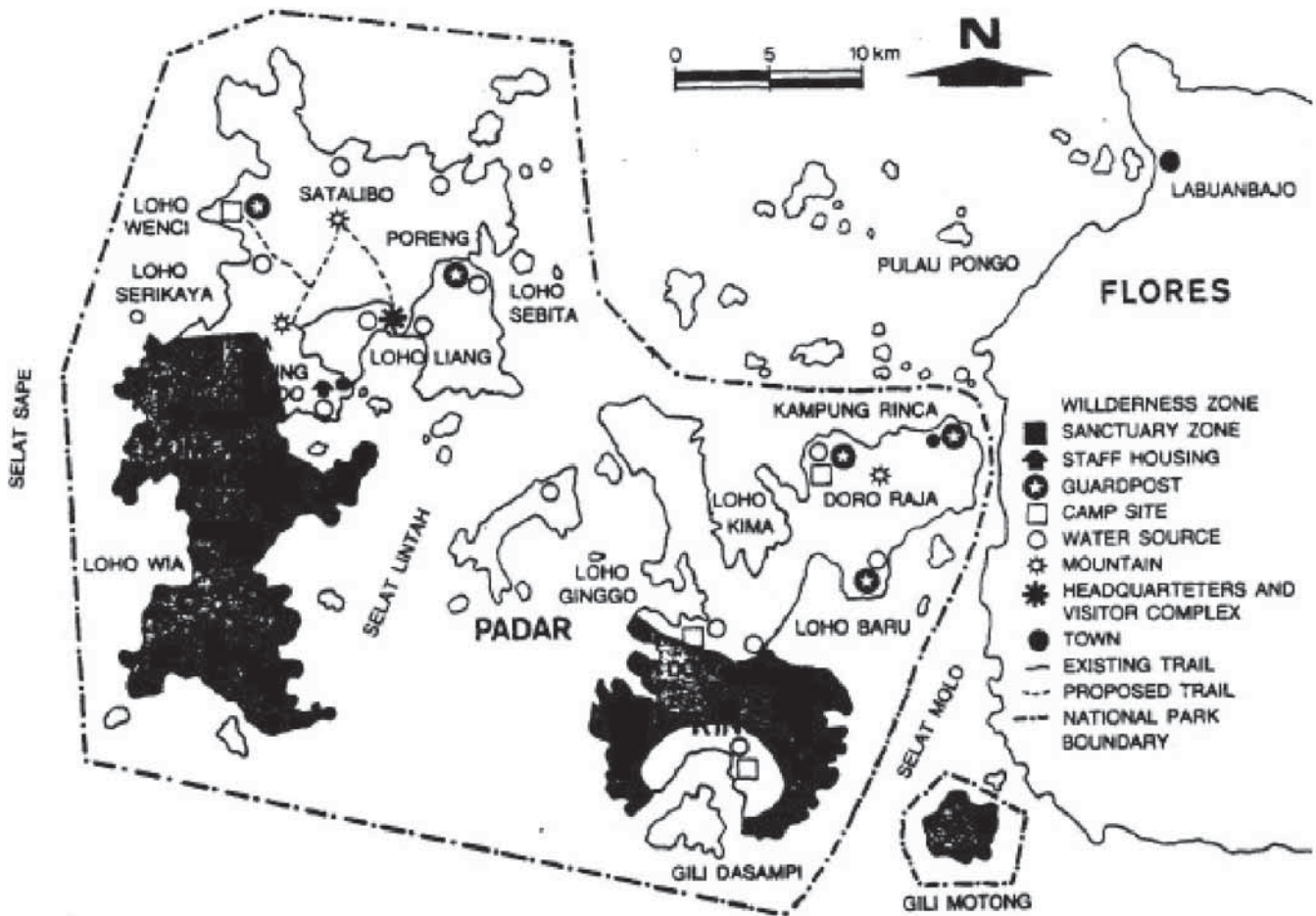


Fig. 8: Map of Komodo NP from the 1991 Evaluation Mission Report and UNESCO website

Source: UNESCO.

The map of Komodo NP presented on the UNESCO WHC website ([https://whc.unesco.org/en/list/609/multiple=1&unique\\_number=723](https://whc.unesco.org/en/list/609/multiple=1&unique_number=723), see Fig. 8), indicated to be of 1990, shows an area slightly smaller (about 168.000 ha) than the current KNP (173.300 ha). Since it seems to be taken from a very low quality black & white photocopy not actually meeting any serious standard of a map, the indicated Sanctuary zone and Wilderness zone are not well identifiable.

The **1991 IUCN Evaluation Report** (609-IUCN-723-en), containing the same map (p. 3 {24}), introduces the nominated property:

"1. LOCATION: The national park is located in the Lesser Sundas. It comprises a coastal section of western Flores and the islands of Komodo, Padar, Inca and Gili Motong and the surrounding waters of the Sape Straights. 219,322ha.

2. JURIDICAL DATA: Komodo was declared a national park in 1980 and extended to 219,322ha in 1984 to include an ex-

panded marine area and a section of mainland Flores. ..." (p. 1 {21})

Although author Jim Thorsell, a very experienced IUCN expert, gives the area of the NP with 219,322 ha **after extension**, and refers to "a section of mainland Flores", no protected area on Flores is indicated on the map he includes in his report, and the map he includes shows only 168,000 ha.

The protected areas on mainland Flores are "Mbeliling Nggorang and Way Wull" (p. 5 {25}). Thorsell was neither convinced of their integrity (despite having Komodo monitor lizard populations) nor did he evaluate their management schemes to be effective. The protected areas "are only attached to the Komodo [NP] office for administrative ease." (p. 5 {25})

In conclusion, IUCN therefore recommended that "Komodo National Park should be inscribed on the World Heritage List.



The boundaries should encompass the offshore island groups and not the buffer zone or the reserves on Flores Island...” (p. 7 {28})

The map included on page 3 {23} of the Evaluation Report shows neither the buffer zone nor the reserves on Flores Island mentioned in the evaluation. It is identical with the 1990 map shown on the UNESCO website (see Fig. 8 above).

The **1991 UNESCO World Heritage Committee Decision** for inscription follows the IUCN recommendation but does not include any information about the actual size of the inscribed property [<https://whc.unesco.org/en/decisions/3522>, <https://whc.unesco.org/document/921>] (p. 28).

The **1995 State of Conservation Report** notes: “It may be of interest to the Bureau to note that with help of the World Heritage Fund, a Geographical Information Project was set up at Komodo National Park and a zonation map of Komodo National Park was prepared.” [<https://whc.unesco.org/en/soc/2008>]

The most recent **Periodic Report** from 2003 (!!) mentions a 25-year Management Plan (2000-2025) which includes a zoning of seven types of zones. It also mentions a possible 50.400 ha extension towards the Banta Island northeast of Komodo island, which don’t seem to have materialized so far. [<https://whc.unesco.org/document/162881>] (p. 4 {227})

Apart from the **Adoption of retrospective Statements of Outstanding Universal Value** in 2013 (12 years after inscription) not a single document on Komodo NP is available on the WHC website covering the last 17 years (2004-2021).

Whereas the Indonesian State Party, in a **2012 Zoning Decree**<sup>9</sup>, still used the same incorrect figure, a new **2020 Rezoning Decree**<sup>10</sup> corrected the figure to 173,300 ha.

## Conclusion

It would appear that the WH Committee in 1991 followed the recommendation of IUCN, and neither “the buffer zone nor the reserves on Flores Island” were inscribed in the WH List. However, the WH Centre (and IUCN<sup>11</sup>) have continued to work with a total area of the Komodo NP of 219,322 ha, failing to subtract the areas on Flores Island which were not inscribed, which would have led to the correct area of 168,000 ha (1991) respectively 173,300 ha (2012 or earlier). As a result, the territory of the World Heritage Property has been indicated incorrectly by UNESCO and IUCN by about 46,000 ha for 30 years until this day.

<sup>9</sup> Decree of the Director General of Forest Protection and Nature Conservation No. SK.21/ IV-SET / 2012 dated 24 February 2012

<sup>10</sup> Decree of the Director General of Nature Resources and Ecosystem Conservation No. SK.212/KSDAE/SET.3 /KSA.0/11/2020 dated 6 November 2020

<sup>11</sup> World Database on Protected Areas <https://www.protectedplanet.net/67725> accessed 09-05-2021

## V. Natural Properties



# Doñana Dries up Surrounded by Environmental Problems

Juanjo Carmona and Teresa Gil, WWF Spain



With the objective of assessing the conservation status of the Doñana Protected Area, in the southeast of Spain (Andalusian region), in January 2011 a joint mission was carried out by the IUCN, World Heritage Centre (WHC) and the Ramsar Council Secretariat which concluded with a report detailing the challenges and problems faced, as well as possible solutions.

Since then, the UNESCO WHC has taken six decisions and sent a further two missions, the first in 2015 and the next in February 2020. The report of the latter on the Outstanding Universal Values (OUV) is still pending, and this will be used as the basis for the WHC decision to be made at the upcoming meeting where the Doñana OUVs will be addressed.

Both the missions and the resolutions approved over a period spanning almost a decade reiterate the existence of numerous

threats and pressures on the Doñana OUVs, which in WWF's opinion demonstrates that the measures adopted by the Spanish authorities have been insufficient to combat the over-exploitation of the aquifer, the theft of water, and the possible impacts of industrial projects (dredging of the Guadalquivir River, underground gas storage, and open-cast mining).

## Environmental problems of the Doñana OUVs and the surrounding areas

The experts from the latest joint WHC-IUCN-RAMSAR Mission to Doñana, in February 2020, were the first to be informed of the WWF Report Analysis of the *Environmental Problems of Doñana and the Guadalquivir Estuary*, prepared by the organisation on the occasion of the 50<sup>th</sup> anniversary of the National Park, which was celebrated in 2019 (Fig. 1).

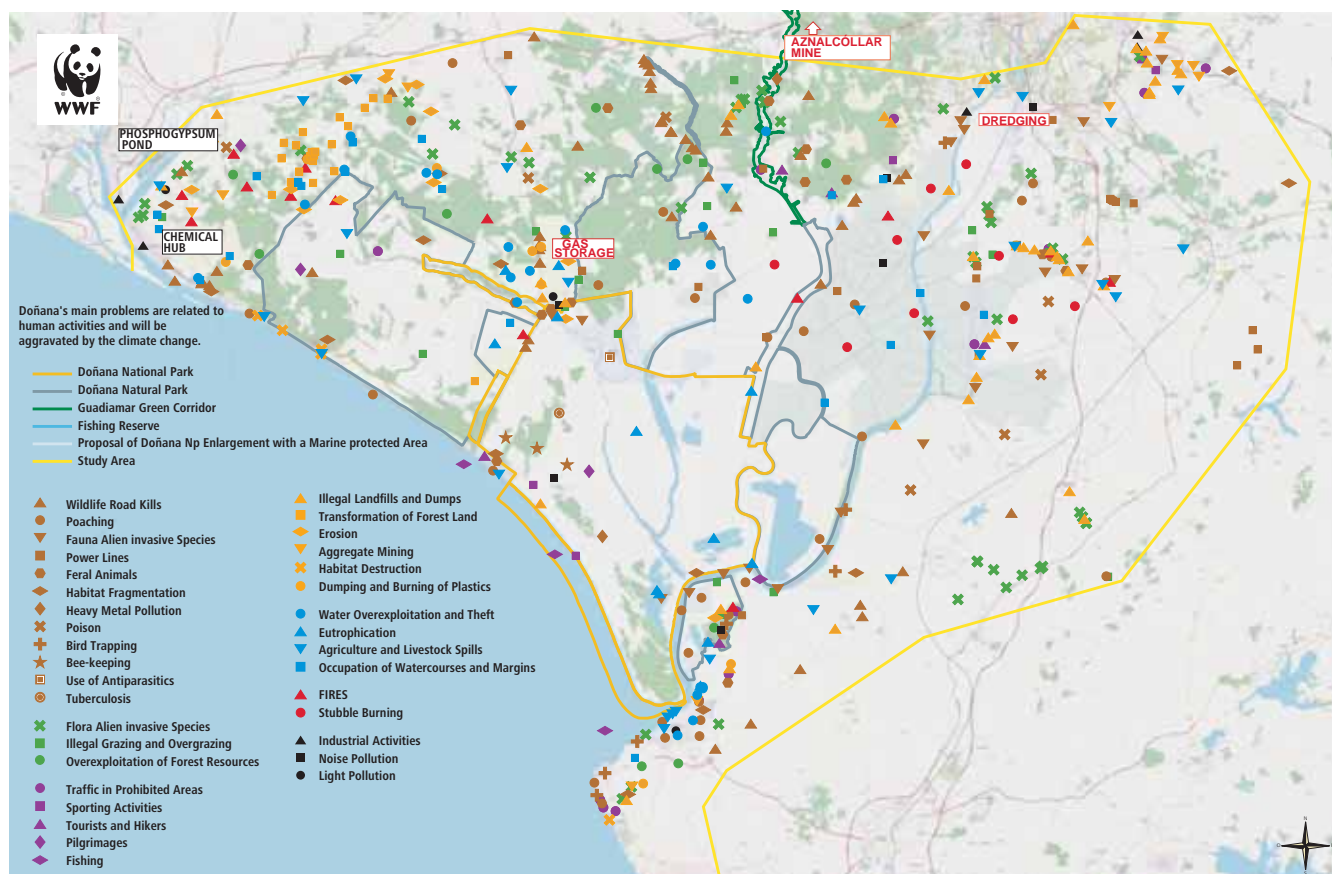


Fig. 1: Environmental problems of Doñana and the Guadalquivir Estuary.

Map: WWF Spain

This report makes a detailed analysis of the problems and the state of health of the most important wetland in Europe, and proposes solutions to ensure a future that remains uncertain unless urgent and decisive action is taken. In total, WWF has identified 40 different kinds of problems distributed throughout Doñana and the Guadalquivir Estuary area, which are aggravated by the current scenario of climate change.

Doñana is a unique place that requires the management of marine areas; an estuary; a coast used for tourism; forests; marshes; the end of a river basin; agricultural areas, including rice paddies and strawberry fields; one of the most important fisheries in the North Atlantic, in the Gulf of Cadiz; the largest pilgrimage in Spain; military areas; intense oil tanker traffic; thousands of vehicle journeys every day; and many other activities. Human activity has modified this space so much that it has caused profound changes. These changes have had numerous and diverse impacts and include water theft, habitat fragmentation, poisoning, mining, light and noise pollution, poaching, mass tourism, abandonment and burning of plastics, destruction of forests, and more.



Fig. 2: One of the roads that cross the Iberian Lynx's territories near the border of the Doñana protected area.

Photo: WWF Spain

Although it is true that this region has had a continuous human presence since ancient times, the feature that best defines this new era is the variety and scale of the impacts and transformations that the area of Doñana and the Guadalquivir Estuary is undergoing, problems that arise from the existence of conflicting development models at the environmental, economic and social levels. That is why we call on the authorities to adopt comprehensive management models, which include decisive measures to adapt to climate change. Tackling these problems means conserving Doñana, improving the living conditions of its inhabitants and ensuring its future.

### Water theft in Doñana: ineffective measures

The inactivity of the authorities in the face of water theft, the deteriorating state of the aquifer, and the illegal growing of soft fruit crops in Doñana, has led international organisations

to react, and since 2011 the WHC has repeatedly expressed its deep concern about these issues. Indeed, the European Commission has actually taken Spain to the European Court of Justice for its failure to protect Doñana. As a consequence, the Advocate General of the Court of Justice of the European Union, Juliane Kokott, published a report on December 3rd in which she concluded that the "excessive extraction of groundwater" in the natural area of Doñana violates Community law. The verdict is expected in early 2021.

This situation has resulted in certain actions by the Spanish authorities to prevent international sanctions. However, as we have seen at the WWF, the majority of these actions are ineffective: the irrigated surface area has not decreased, the aquifer is still being progressively degraded, further groundwater contamination problems arise, and so on.



Fig. 3: Intensive agriculture in the surrounding area of the Doñana World Heritage property.

Photo: WWF Spain

This is demonstrated in the report published by WWF in September 2020 which analyses the evolution of the irrigated area in Lucena del Puerto (Huelva) between 2014 and 2020. Lucena del Puerto is one of the municipalities with the highest number of wells and illegally cultivated hectares in the Doñana region.

WWF has used satellite images to analyse the evolution of the cultivated area in Lucena del Puerto over the 2014-2015, 2018-2019, and 2019-2020 agricultural seasons. Since the summer of 2019, at least 116 illegal wells have been closed in the area around the headwaters of the Arroyo de la Rocina and Don Gil streams.

Nevertheless, over the period 2014-2020, the irrigated surface area of crops grown under plastic has not decreased significantly, as illustrated by satellite images, so the **measures taken to date have been totally ineffective in eliminating illegal plantations and reducing pressure on the aquifer.**

However, this situation is not only affecting this municipality, as despite the Andalusian Government approving the Special



Management Plan of the Irrigation Zones located to the *North of the Forest Crown of Doñana*, in December 2014, irrigation continues to expand, as WWF has clearly demonstrated in its annual reports.

Period/campaign	Cultivated area (hectares)	Milestone
2014–2015 campaign	1462.5 hectares	Approval of the Forest Crown Plan
2018–2019 campaign	1514.9 hectares	Period of illegal well closures in Lucena del Puerto following the TSJA ruling
2019–2020 campaign	1507.3 hectares	First agricultural campaign after the well closures

Fig. 4: Irrigation and cultivated area campaigns in Lucena del Puerto.

Source: WWF Spain

The absolute failure of the Andalusian Government to comply with its obligations and close down the illegal farms, in the fulfilment of its functions, means that over the period 2015–2019 the area of soft fruit crops grown within the ambit of the Special Plan has actually increased by 552.5 hectares. **The total surface area of crops in zones that cannot be legalised is 1,653 hectares, representing 20.7% of the total area of crops grown under plastic.** This growth is having a huge impact on the quality and quantity of water available for the Doñana Natural Area wetlands, which are currently on red alert.

### The lost decade

The Doñana aquifer is progressively deteriorating due to the incompetence of the authorities and in 2020 was declared over-exploited. The Guadalquivir River Basin Authority has been forced to take the most extreme measure that exists in Spanish water legislation regarding an aquifer in poor condition, in 2020

declaring three of the five Doñana aquifer bodies as being at risk of not achieving good quantitative status – “La Rocina” (also at risk of not achieving good quantitative status due to pollution), “Almonte” and “Marismas” (see Fig. 5). This highlights the inaction of previous administrations, which allowed crops and illegal wells to proliferate until the current limit situation has been reached where much more water is extracted than is recharged.

This declaration, called for by the WWF on countless occasions, will allow greater control over the aquifer and, if the appropriate restrictive measures provided for in law are applied, this could start the aquifers down the path to recovery.

According to the data provided by the Guadalquivir River Basin Authority and analyzed by WWF, in 15 of the 16 aquifer sectors the water level was worse in 2019 than it was in 2010, meaning the entire decade has been lost. Only in the Southern Sector of the Arroyo de la Rocina has the situation remained unchanged, the precise location of the Mimbrales estate, which was purchased by the Guadalquivir River Basin Authority and from which the crops were removed in 2016. There are very serious situations in the rest of the aquifer. For example, the North Sector of El Rocío has been in a state of alarm since 2012, and the South Headwater Sector of La Rocina has been on alert for a decade. Despite this data, the current draft of the new Water Management Plan for the Guadalquivir River Basin does not include the measures necessary to reverse the situation, although it does include others that help perpetuate it, such as the transfer of water from the Tinto-Odiel-Piedras Basin to the Doñana area, which will only contribute to maintaining the invasion and unsustainable agricultural model that surrounds this Protected Natural Area.

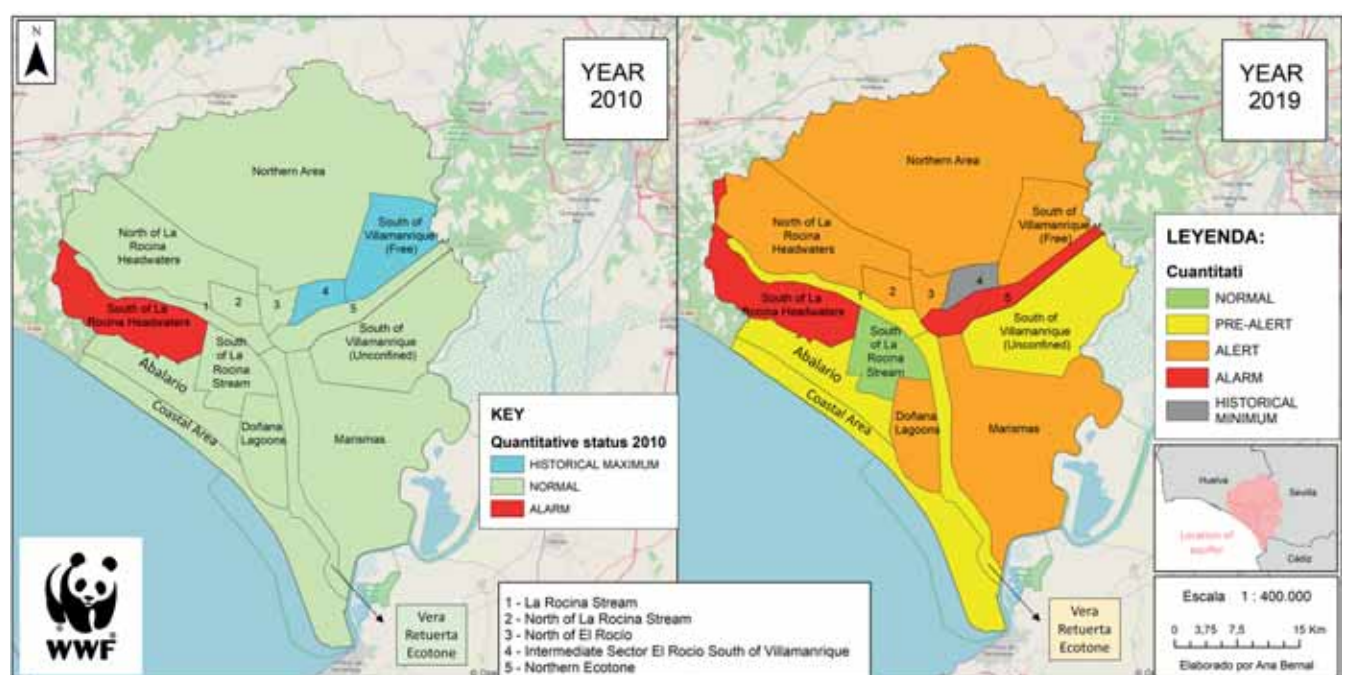


Fig. 5: State of the “QS” for the Doñana aquifer in 2010 and 2019 and an evaluation of this.

Map: WWF Spain

#### Police investigation into water-related crimes within the Doñana National and Natural Park

In 2020, the Civil Guard, as part of operation “Zacallón”, investigated several people linked to the Doñana Natural Area<sup>1</sup>, for alleged crimes against land planning regulations and water misuse inside the protected area.

Among other infrastructures, 22 illegal wells and 11 *zacallones* (artificial ponds) have been detected, which are affecting the aquifer as well as the fauna and flora of the protected area, according to a press release<sup>2</sup> by the Spanish police.

1 [https://www.huelvainformacion.es/provincia/Juzgado-Palma-conservador-Donana-ilegalidades\\_0\\_1491451299.html](https://www.huelvainformacion.es/provincia/Juzgado-Palma-conservador-Donana-ilegalidades_0_1491451299.html)

2 <https://www.guardiacivil.es/es/prensa/noticias/7629.html>

## Recommendations

WWF calls for the strict and immediate application of the Forest Crown Plan, the urgent implementation of the measures provided for in the Water Law for the water bodies at risk of not achieving a good status, the approval and implementation of an annual plan for extracting water from the aquifer, the closure of illegal farms, and the decommissioning of non-permitted infrastructure (wells, ponds, watercourses, etc.).

In addition, WWF considers it necessary to take precautionary measures to prevent further illegal extraction from the aquifer and to expand the control and monitoring network for groundwater and surface water, as well as to draw up a Special Land Management Plan beyond the scope of the Crown Plan for irrigated areas that take water from the aquifer and where irrigation is expanding uncontrollably.

At WWF we believe that an ecological agricultural model should be urgently implemented as a long-term solution, which will result in improved water quality and put an end to the unsustainable use of this resource in Doñana.

# Białowieża Forest World Heritage Site: What is Next After the 2020 Relief?

Tomasz Pezold Knežević, WWF Poland



Fig. 1: Aerial view of Białowieża Forest regenerating after logging in 2016-2018.

Photo: Tomasz Pezold Knežević

After substantial extension of the transboundary property in 2014, the entire Białowieża Forest on the Polish and Belarusian side is on the World Heritage List. However during the years 2016-2018 the OUV of the Property on the Polish side has significantly deteriorated due to large-scale logging operations conducted in response to bark beetle infestations. In the year 2017 alone, commercial timber extraction reached unprecedented levels of 190.000 m<sup>3</sup>. Most logging operations were carried out in the most valuable old-growth forest stands over 100 years old. The logging caused massive destruction and deterioration of habitats of saproxylic invertebrates and affected breeding areas of birds particularly important for the area.

As the logging was also interfering with regulations related to Białowieża Forest as part of the European Natura 2000 network, in its judgment of 17 April 2018 the Court of Justice of the EU ruled against Poland for failing to ensure that the forest management plan for the Białowieża Forest District would not adversely affect the integrity of the Natura 2000 sites. As a consequence of this verdict, the Polish Government decided to put logging operations on hold.

The joint UNESCO World Heritage Centre/IUCN Reactive Monitoring mission took place from 24th September to 2nd October

2018. The mission noted<sup>1</sup> that the forest management regime in place in the Belarusian component of the property privileges a strict non-intervention policy in the majority of the property and targeted active management linked to specific conservation objectives in a smaller part of the property and that such regime is fully in line with the objectives of conserving the property's OUV.

However the mission concluded that activities implemented on the Polish side were not in line with the commitments formulated in the 2014 nomination dossier and have disrupted the ecological and natural processes in the property, resulting in negative impacts on its OUV. These include in particular: widespread logging activities, including the removal of deadwood, widespread safety cuttings made on 150-meter strips on both sides of minor paths and roads, large-scale sanitary cuttings, and active forest regeneration activities.

These activities were also undertaken in the partially protected zone II, which includes old-growth forest more than 100 years old. Harvested timber has also been commercialized. The mission came up with several recommendations on actions to be undertaken in order to secure the long term conservation of the Property's OUV.

<sup>1</sup> Report on the Joint World Heritage Centre – IUCN Reactive Monitoring Mission to Białowieża Forest (Belarus and Poland) from 24 September to 2 October (2018) <https://whc.unesco.org/en/list/33/documents/>



The World Heritage Committee in its decision during the Session in Baku in 2018, besides recalling its previous decisions, concluded *inter alia* as follows:

- Non-compliance of the forestry operations in the property with the management prescriptions in line with the 2014 Nomination and as recommended by the 2018 mission would constitute a clear case of ascertained danger to the property, in line with Paragraph 180 of the *Operational Guidelines*, and warrant inscribing the property in the List of World Heritage in Danger.
- Requested the State Party of Poland to revoke the amendment of the Forest Management Plan (FMP) for the Białowieża Forest District and ensure that any new FMP for areas within the property are based on the new overall Management Plan of the Polish part of the property.
- Existing FMPs should not be amended, or only in a very restrictive way allow for strictly necessary safety measures and on the basis of a clear risk evaluation plan, and that any amendment should be sent to the World Heritage Centre with a clear justification, for review by IUCN, before approval.
- Reiterated its request to the State Party of Poland to develop, as a matter of priority, an overall Management Plan (MP) for its part of the property, which places the protection of the property's OUV as its central objective, also taking into account the recommendations of the 2018 mission, and to submit a draft of the overall MP to the World Heritage Centre for review by IUCN before its final approval.
- Requests the States Parties of Belarus and Poland to expedite the preparation of a Transboundary Integrated Management Plan, defining the overall management vision for the property based on the Statement of OUV, and setting out the transboundary governance system, as recommended by the 2018 mission.
- Noted with concern that the upgrading of the Narewowska road by the State Party of Poland could potentially affect the ecological connectivity in the property, and requests moreover the State Party of Poland to suspend any upgrading works on the road pending completion and submission of an Environmental Impact Assessment (EIA) which specifically assesses the impacts of the road improvement on the OUV.

No progress has been made by the Polish authorities to address above-mentioned recommendations and decisions. On the contrary, some of the actions undertaken are violating World Heritage Committee decisions. As a consequence of putting logging operations on hold, the year 2020, partly due to the COVID pandemic, gave a relief to the ecosystem of the Białowieża Forest and its OUV. However the future of the Property remains uncertain.

#### Key findings in relation to the response by the State Party of Poland to the decisions of the World Heritage Committee and recommendations of the 2018 joint UNESCO World Heritage Centre / IUCN Reactive Monitoring Mission

- Despite the request to the State Party of Poland to suspend any upgrading works on the Narewowska road, the upgrade has been completed and the road opened for public use.



Fig. 2: Upgraded Narewowska road opened to the public despite the decision of the World Heritage Committee.

Photo: Tomasz Pezold Knežević

- Despite the request to the State Party of Poland to revoke the amendment of the Forest Management Plan (FMP) for the Białowieża Forest District, the plan has been adopted in 2021 in spite of the fact that IUCN gave a negative assessment of the impact of the plan on the OUV.
- The Transboundary Steering Committee and the Steering Committee between the National Park and the Forest Administration in Poland and its coordination group remain nonfunctional, which results in a lack of coordination and involvement of key stakeholders such as NGOs, scientists, and local communities.
- No substantial efforts have been undertaken in order to expedite the development of an Integrated Management Plan on Polish side.
- Local communities and other stakeholders are not being properly involved in any preparatory work related to the Management Plan for the Białowieża Forest Transboundary World Heritage Site.
- 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 long-term stakeholder engagement programme needs to be implemented.
- 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 the Polish authorities regarding the vision for sustainable development of the Białowieża Forest region or awareness-raising regarding the value of the Białowieża Forest.
- Despite the fact that the State Forests Holding and Białowieża 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 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 proper stakeholder participation, and its final version was not disclosed to the public.
- Local tourism-related businesses suffered in Spring 2017 when large parts of the Forest were closed for entry and patrolled by forest guard and the police. However the year of 2020 was very prosperous for the local tourism sector. Although the Site at times was closed to tourism due to COVID-related restrictions, the remaining months provided an unprecedented visitation due to the shift from international to local destinations.



Fig. 3: An exhibition in Białowieża promoting World Heritage. The year of 2020 was very prosperous for the local tourism sector due to the shift from international to local destinations during the COVID pandemic. Photo: Tomasz Pezold Knežević

## Other issues which may have an impact on Property's Outstanding Universal Value

- Local authorities together with the regional authority for roads since beginning of 2020 have been pushing for new investment in the area – building a bicycle path along the main road Hajnówka-Białowieża without consideration of other variants. Although it would mean felling 4,400 trees, 44% of which in a nature reserve, they claim it would not have any adverse impact on the OUV.
- A photovoltaic farm planned in Białowieża village: in a similar way as with the bicycle path, an idea of creating a photovoltaic farm by a private investor is being pushed forward. The farm of a size of 1,5ha is to be located at Białowieża glade. Very little information has been provided to the public on this matter.

## Final remarks and conclusions

This report focuses on the Polish side of the Property, mostly due to the fact that the management of the Belarusian component is regarded by IUCN/UNESCO as appropriate in order to conserve OUV.

Since 2014, i.e. the significant extension of the Property, there has been no progress on the Polish side in addressing decisions of the World Heritage Committee and the recommendations of IUCN/UNESCO. On the contrary, some of the actions being undertaken are in clear contradiction to those proposals.

Several necessary inputs are in place in order to improve management and conservation of the OUV of the Property. Extensive information has been collected and include inter alia the Nomination file, decisions of the World Heritage Committee since the site's inscription in 2014, and recommendations made by the 2016 IUCN Advisory Mission. The report by the WHC/IUCN Reactive Monitoring mission of 2018 further consolidated this knowledge and provided additional detailed recommendations.

The root cause of this situation is a dysfunctional governance and management of the Polish side. It continues with the further deterioration of the Outstanding Universal Value, creating untrustful relations between involved stakeholders and the inability to use untapped potential and ensure fair and equitable sharing of benefits arising from the site.

# Europe's Last Ancient, Primary and Old-growth Forests Under Threat of Destruction

EuroNatur Foundation (Germany) / Agent Green (Romania)  
WOLF Forest Protection Movement (Slovakia) /  
Protection and Preservation of Natural Environment in Albania (Albania)



Primary and old-growth forests are masters of natural cycles and diverse ecological communities. The endemic Common Beech (*Fagus sylvatica*) and its forests were once spread widely throughout the European continent, and without human intervention they would still cover most of its southern and western temperate climate zones. But with the dispersion of human-made landscapes, only few tracts of natural – primary and old-growth – beech forests are left in Europe. These forests are of outstanding universal value. Some of them are part of the transboundary World Heritage Site “Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe”. Listed under criterion ix of the World Heritage Convention, they are “outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals”.

The Property is shared by twelve countries and encompasses 92,023,24 hectares. However, the countries hosting the component parts manage them with different levels of care, as will be described in this report. In Romania, for example, these forests are even under serious threat.

The biggest share of the transboundary World Heritage property is found in Romania (23,983 hectares in 12 component parts), hosting 26% of the its entire surface. All in all, Romania is home to the lion's share of intact forests in the European Union outside of Scandinavia as it still hosts at least 500,000 hectares of potential primary and old-growth forests (Schickhofer and Schwarz 2019).

Unfortunately, these forests are under huge commercial exploitation pressure as intense logging occurs throughout Romania and does not respect the borders of protected areas. Even Natura 2000 sites are not safe from logging, and hence Romania is now facing an infringement procedure by the European Commission. There is a risk that the European Commission will escalate the case to the European Court of Justice (ECJ). Logging in Natura 2000 sites is also threatening some of Europe's last primary and old-growth beech forests included in buffer zones of the very UNESCO property.



Fig. 1: 350–400 years old beech trees logged very close to the UNESCO World Heritage component part launa-Cariova.  
Photo: Matthias Schickhofer

In the last years there have been reports documenting evidence of several cases of logging occurring immediately adjacent to the inscribed sites in Romania. The serious impacts on the integrity of the World Heritage property are undeniable: Progressive cutting of ecologically mature forests stands in the buffer zones of the World Heritage components leads to the complete liquidation of these old ecosystems with their rich biodiversity (including numerous protected species depending on dead wood and aged trees), interrupting ecological migration corridors between UNESCO component parts and often leaving behind devastated and polluted logging sites. Many of these destroyed forests areas have an ecological value equal to those included in the property but are not protected at all and are thus being logged or under threat from future logging activities (see Fig. 2 and 3, p. 182).

The importance of protecting these last ancient beech forests like those included in the World Heritage property is further underpinned by the call within the EU Biodiversity Strategy which clearly states “As part of this focus on strict protection, it will be crucial to define, map, monitor and strictly protect all the EU's remaining primary and old-growth forest”. Thus, we are concerned for the integrity of the forests included in the World Heritage property, especially the forests of Romania.

However, Romania is not the only case causing concern. Logging and other threats to component parts of the transboundary UNESCO World Heritage property have also been reported in Albania, for example. There, Gashi River and Rrajca primary beech forests are a genetic beech refugia in the southern Bal-





Fig. 2: Protected primary beech forest inside in the launa Craiova component of the UNESCO World Heritage site, and

kan. Both sites demonstrate high ecological values and house a wide variety of fauna like the apex Balkan lynx and abundant flora species of European importance. Gashi River holds the highest protection status at national level as a "Strict Nature Reserve" (IUCN Category I), and Rrajca is the core zone of the Shebenik-Jabllanica National Park (IUCN Category II).

However, they face constant anthropogenic pressure. Overgrazing, fires ignited by shepherds, recent tourism infrastructure, road construction as well as logging are increasing in the UNESCO World Heritage Buffer zones. In Rrajca - despite the currently imposed national logging and hunting ban, respectively, both illegal activities still continue. And at Gashi River a new hydropower project is planned very close to the World Heritage site.

At the same time, other countries are setting great examples on how to counter logging and protect our natural heritage. For example in Slovakia: In the original nomination project from 2007, the Slovak components were declared protected on national level. Nevertheless, logging and hunting were carried out in the most of the inscribed areas and in the whole buffer zone.

Only in September 2020, after 12 years of constant pressure from environmental organizations (i.e. WOLF), the World Heritage Committee, civil society in Slovakia and foreign NGOs, the Slovak government has established new strictly protected areas ensuring proper protection of the inscribed area (IUCN category Ia – Strict Nature Reserves) and the buffer zone of the Slovak components of the UNESCO World Heritage property. In the buffer zone, only logging of individual trees is allowed, and only by permission of the State Nature Conservancy of the Slovak Republic.

Despite the issue of logging in Romania having been raised many times by different entities, including IUCN and the World Heritage Center and even in spite of the ongoing EU infringement procedures, Romania's primary and old-growth forests – including the valuable beech forests – are still under



Fig. 3: Unprotected forest with equivalent ecological value in Cernisoara forest unit in the buffer zone of Domogled – Valea Cernei National Park / UNESCO World Heritage site / Natura 2000 site).  
Photos: Matthias Schickhofer

threat. Again in 2020, auctions of forests within the buffer zones of the UNESCO World Heritage in Romania have been announced and/or approved by Romania's state forest management agency Romsilva for 2021.

### Domogled - Valea Cernei National Park – still a case of worst practice

The Park is Romania's largest National Park and at the same time an EU Natura 2000 site. It contains three component parts of the *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe* World Heritage site: Coronini - Bedina, launa Craiovei and Ciucevele Cernei. The entire National Park outside the inscribed UNESCO areas constitutes the formal buffer zone of the site. Still, these forests are not safe from logging as even in the strict non-intervention zones of the National Park, illegal logging has taken place. The situation in Domogled - Valea Cernei National Park seems the most serious with regard to commercial logging adjacent to World Heritage component parts and within the site's formal buffer zone.



Fig. 4: Unprotected and destroyed primary beech forest in the buffer zone of the Domogled Valea – Cernei UNESCO site and National Park / Natura 2000 site.

Photo: Matthias Schickhofer

Logging there is mainly done via "progressive cutting" (step-wise removal of all trees of a forest parcel over a period of 10 years) or "conservation logging" (cutting of openings in the

forest to stimulate growth of young trees). Thus, several environmental organizations are concerned about these intense logging activities and believe them to be threatening the whole component parts as, according to the World Heritage Centre, “a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property” (UNESCO WHC, 2017).

As previously communicated to IUCN and the World Heritage Centre, logging is occurring at the immediate border of the UNESCO World Heritage site. Throughout the year 2020 environ-

mentalists have found different logging sites within the Buffer Zone (Fig 5 and 6).

And for 2021 the list of planned logging parcels by Romsilva shows 32 parcels within the UNESCO World Heritage Site's Buffer Zones, in some cases adjacent the core zones (see Fig. 7, next page). All logging permits for 2021 can be found here with GPS coordinates (selecting the county and the forest district):<sup>1</sup>

These forests designated for logging are similar to the primary forest inside the World Heritage component parts and thus are of the same outstanding universal value. They host vast biodiversity and are home to many species, such as saproxylic beetles, bats, owls, wolves, brown bears and lynx. Thus, this past logging and future logging plans represent a clear disregard for UNESCO values and for the World Heritage Convention as well as EU legislation. These activities in Romania threaten the whole transboundary property as the whole property might be listed as “in danger” in case of a deliberate damage of a component part.

Furthermore, the issue of logging in buffer zones of World Heritage Areas is not limited to Domogled National Parks and not limited to the Romanian World Heritage sites, as mentioned above. We therefore request the World Heritage Committee to urge the World Heritage Centre and advisory bodies to set standards for buffer zone management. These standards should clearly prohibit industrial exploitation use of resources – such as commercial logging – within buffer zones of World Heritage properties.

The standards should not go below the IUCN regime for Category II Protected Area (national parks; “eliminate and prevent exploitation”; primary conservation objective valid for the whole protected area; no exploitation except subsistence use by indigenous peo-

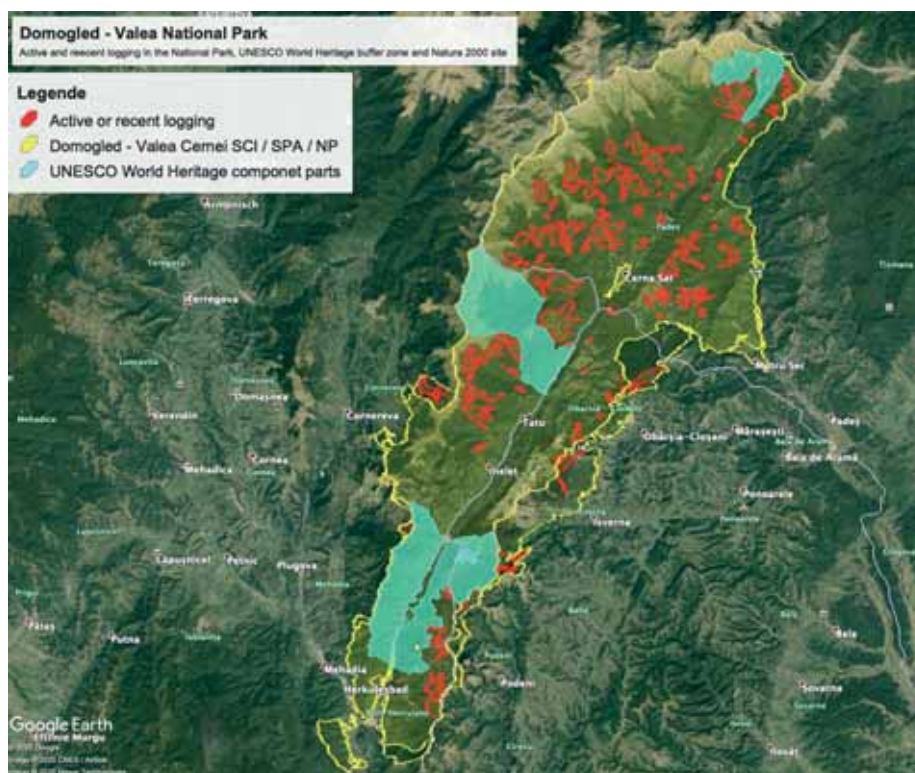


Fig. 5: Domogled National Park (yellow contours) with 3 World Heritage components (turquoise areas) and current and recent logging (red contours) in the buffer zones, even close to the core zones.

Map: Euronatur/Agent Green



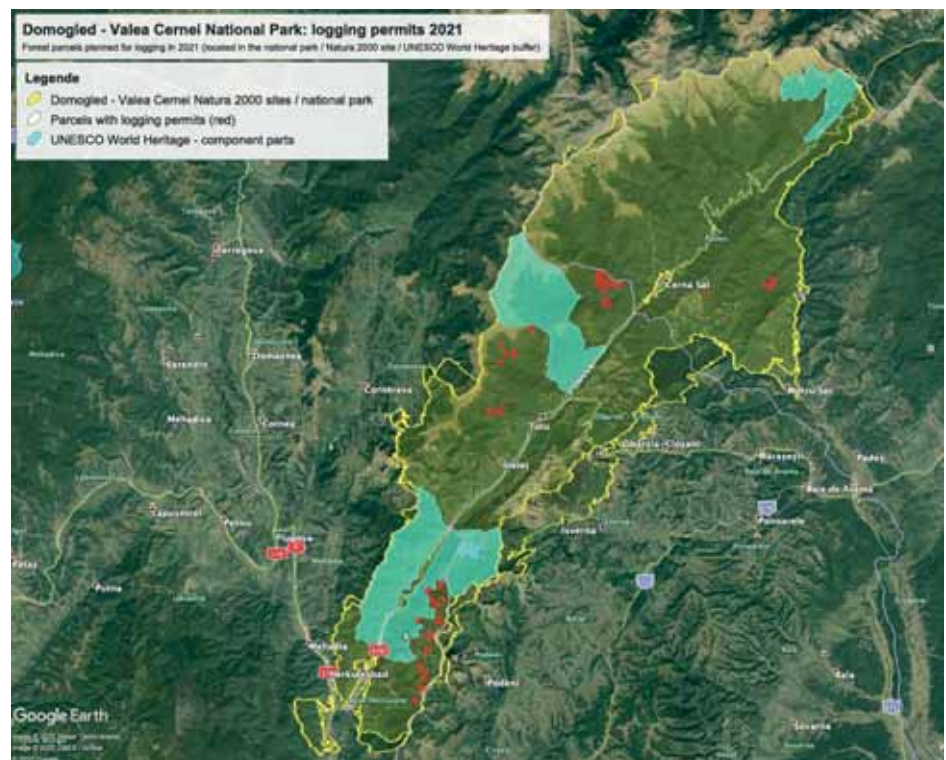
Fig. 6: Recent logging (red contours) adjacent to the components of the UNESCO World Heritage site.

Map: Euronatur/Agent Green

<sup>1</sup>[http://www.romsilva.ro/articole/catalog\\_masa\\_lemnoasa\\_2021\\_p\\_2646.htm](http://www.romsilva.ro/articole/catalog_masa_lemnoasa_2021_p_2646.htm)



Fig. 7: Parcels designated for logging in 2021 (red contour) in Domogled-Valea Cernei National Park and UNESCO World Heritage Site buffer zone. Map: Euronatur/Agent Green



ple) and need to respect – e.g. prohibition of watering down - other protection regimes relevant for the site, such as the EU's Natura 2000 directives (prohibition of significant deterioration of conservation status of natural habitats and species). The aim to strictly conserve the ecological integrity of natural habitats deserves reliable and comprehensive protection also in buffer zones, in particular when they are of similar value like the ones included in the UNESCO properties itself.

**We encourage the World Heritage Committee to support the protection of the World Heritage Site and respectfully urge the WHC to request the Romanian government to uphold the values of the World Heritage Convention through the following actions:**

- All logging permits in old-growth and primary forests in national parks and UNESCO World Heritage site buffer zones to be cancelled and logging activities to be stopped immediately;
- All old-growth and primary forests in the National Park and UNESCO World Heritage site buffer zones be preserved as designated non-intervention areas (eg. core zones enlarged, UNESCO sites expanded, National Catalogue of Virgin Forests properly implemented). As most of forests within the UNESCO buffer zones of the Romanian component parts are under the management and ownership of the Romanian state, this should be achievable without a bigger need for financial compensation for private land owners;
- National Parks and UNESCO World Heritage sites to be promoted as places where nature conservation is paramount and adequately funded and world's best practice management prioritizes the protection, promotion and restoration of natural ecosystems, not the exploitation of natural resources.
- After the Reactive Monitoring Mission by the World Heritage Centre and IUCN in November 2019 to assess current and potential impacts of ongoing and planned forest management operation on the Outstanding Universal Value of the property, publish the report and according to the found situation start a dialogue with Romania to make sure the situation will be handled und improved soon.

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# The Never-ending Story: Gold Mining in the Virgin Komi Forests World Heritage Property

Irina Panteleeva, Mikhail Kreyndlin and  
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Since 1997, attempts have continued to revive gold mining in the Yugyd Va National Park, which is part of the Virgin Komi Forests World Heritage site. The past year was no exception to this story.

On February 26<sup>th</sup>, 2020 the Vice-Minister of Natural Resources and Environment of the Russian Federation submitted a response to Greenpeace Russia's appeal regarding the cancellation of the gold mining license for the Chudnoe deposit within the boundaries of the Yugyd Va National Park. It follows from the answer that the Ministry refused to implement Decision 42COM 7B.78 of the World Heritage Committee regarding the revocation the license. Instead, the response said that the license was suspended (but not revoked) until the borders of the National Park would change.

In July 2020, Deputy Prime Minister Yuri Trutnev instructed the Ministry of Natural Resources to prepare a draft resolution of the Government of the Russian Federation "On bringing the boundaries of Yugyd Va National Park into line". What was meant by "bringing into line" was not specified, but subsequent events showed that it was precisely about the withdrawal of the Chudnoe field from the Yugyd Va National Park.

In August, on a pre-election meeting with representatives of political parties, the Acting Head of the Komi Republic, Vladimir Uyba, said that the boundaries of Yugyd Va National Park will be modified, gold mining will be revived at the Chudnoe gold deposit, and an ore mining and processing plant will be built. An audio recording of Mr. Uyba's speech was published on the Internet<sup>1</sup>:

*"Another story, which I think is very important is the withdrawal from the UNESCO, from the UNESCO bondage [Translator's note: «кабала»], Chudnoe gold deposit. The deposit has nothing to do with Yugyd Va, of course. This is exclusively a UNESCO story: "don't let them mine this gold." Therefore – a strict order by Trutnev: until August 31, the Ministry of Natural Resources gives a conclusion, we are supervising it, that there is no connection with the Yugyd Va. This is the Subpolar Urals, and not the virgin forests of the Komi Republic, these are completely different stories. Therefore, the boundaries will be*

*modified, this is 100%. And it's not just mining, <...>, an ore mining and processing plant will be built. Everything that Intaugol has in terms of mineral processing, it is, with a small reconstruction, absolutely goes under use. Specialists of "Gold Minerals" went and looked at it and it is a good investment for them".*

In autumn, the Ministry of Natural Resources and Ecology published for public discussion the draft proposal of the Yugyd Va National Park expansion. The draft proposal provided for the inclusion of land plots to the national park on the western and southern sides. However, after analyzing the coordinates of the National Park boundaries, Greenpeace Russia found that the Chudnoe field was removed of the national park. The explanatory note did not contain information about this. After public indignation, the Ministry of Natural Resources called this case a mistake and corrected the document. Since then, there has been no information about the promotion of the initiative to expand the National Park.

In October 2020, the draft law which proposes to give the Government of the Russian Federation the right to change the boundaries of national parks at its discretion, was adopted in the first reading. If the draft law was passed, it would be almost impossible to protect the integrity of the Park.

For the second reading, Senator Alexander Russkikh proposed amendments providing for the possibility of withdrawing land from any type of protected areas (including reserves and national parks) for the construction of linear facilities, as well as for the implementation of investment projects "of strategic importance for the development of the Russian Federation and the constituent entities of the Russian Federation."

Shortly before that, the Komi government presented to local deputies a list of investment projects which included gold mining at the Chudnoe deposit in the Yugyd Va National Park. After a Deputy of the State Council of Komi, Oleg Mikhailov, asked the officials how they could have included illegal measures in investment projects, they said that it was done "by mistake." However, the coincidence of the wording convincingly shows that the senator who amended the withdrawal of land for investment projects lobbied for the interests of "Cyprus gold miners" and their supporting officials and businessmen.

<sup>1</sup> [https://vk.com/wall-191551345\\_1515](https://vk.com/wall-191551345_1515)

Fortunately, from the final version of the law, adopted on December 23, all norms on the possibility of excluding lands from National Parks were excluded. Therefore, the lobbyists for gold mining in the World Heritage have again suffered a fiasco.

We recommend that the World Heritage Committee once again request the State Party of the Russian Federation to re-

voke the license for gold mining within the boundaries of the Virgin Komi Forests World Heritage property and abandon attempts to withdraw this territory from the boundaries of the YugydVa National Park. The Committee should also consider the possible inscription of the property on the List of World Heritage in Danger, in the case the State Party of the Russian Federation fails to comply with these requirements.

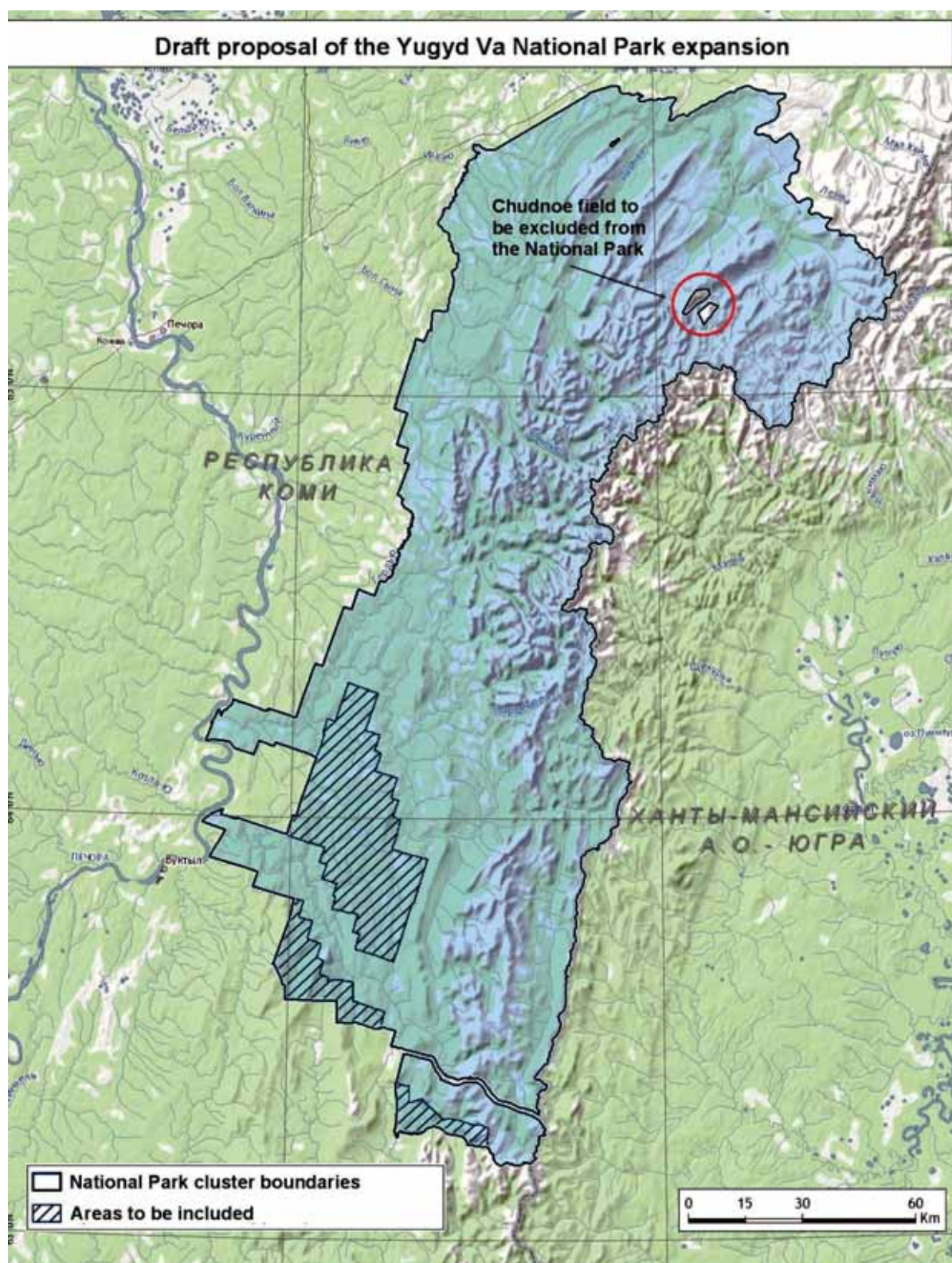


Fig. 1: Proposed changes of the boundaries of Yugyd Va National Park.

Map: Greenpeace Russia



# Resorts as the Greatest Danger for the Western Caucasus World Heritage Property

Irina Panteleeva, Mikhail Kreyndlin and  
Alexandra Pilipenko, Greenpeace Russia



The region of the Western Caucasus World Heritage Site is very attractive for the development of tourism. Since the early 2000s, there have been attempts to build ski complexes on or near the World Heritage Site. During this period, under the guise of a scientific center, the Lunnaya Polyana Mountain Ski Center was built on the Lagonaki Plateau. Expanding the network of resorts and increasing the flow of tourists remains an idea that continues to be aggressively promoted by business. In 2020, unfortunately, many steps have been taken to achieve these goals.

## Caucasus State Nature Biosphere Reserve

According to scientists from the Caucasus State Nature Reserve, the territory of the Lagonaki Highlands is extremely important for the conservation of rare and endangered species. It is a part of reserve where a record number of 196 rare animals, plants and mushrooms, included in the Russian Red Books of federal and regional significance, are documented.

However, the Lagonaki plateau has the status of a “biosphere polygon” of the Caucasus State Nature Biosphere Reserve, where, according to Russian legislation, it is possible to build sports (including mountain skiing) facilities and any tourist infrastructure (including hotels, roads, power lines, pipelines, etc.). Executive authorities are actively discussing proposals for the construction of a ski resort on the Lagonaki plateau.

In the spring of 2020, the Deputy Prime Minister of the Russian Federation Victoria Abramchenko instructed the Ministry of Natural Resources and Federal Registration Service to issue a decree of the Government of the Russian Federation on the creation of a biosphere polygon on a part of the territory of the Caucasus Reserve. According to media reports, the instruction is caused by the lack of appropriate legal acts confirming the creation of a biosphere polygon on the Lagonaki Plateau.

However, on May 2019, a meeting of the Scientific and Technical Council of the Reserve was held which considered and approved the proposals on the boundaries of the biosphere polygon.

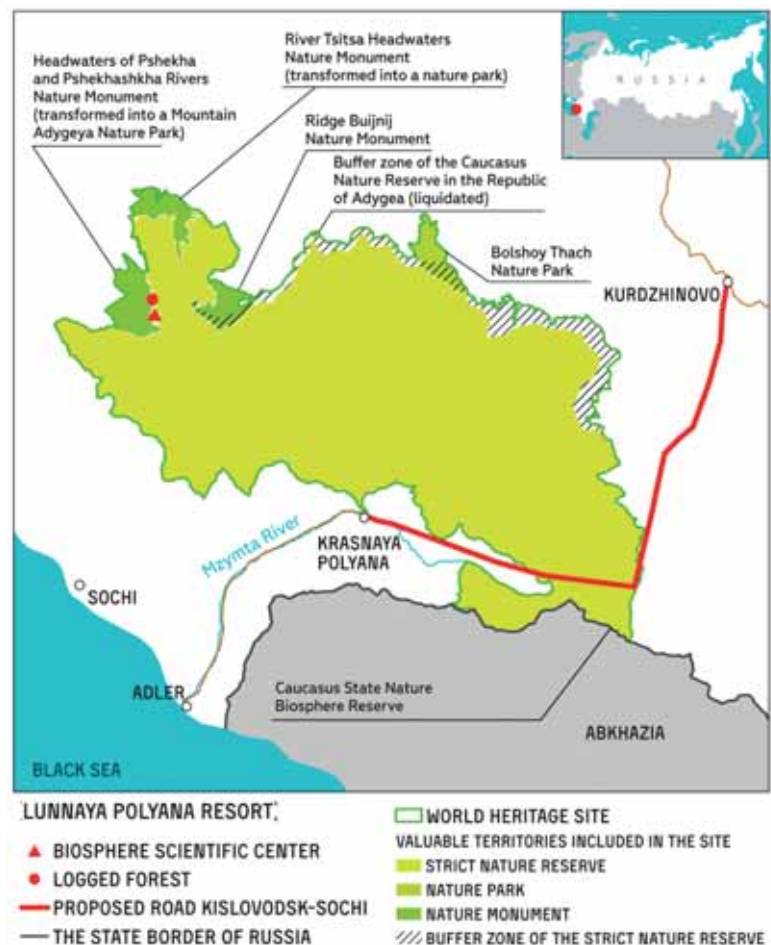


Fig. 1: Changes in the Western Caucasus World Heritage Property.

Map: Greenpeace

According to the map which was presented at a meeting, two sections are plotted on it. Site No. 2 – in the southern part – is the Fisht-Oshten massif, which was added to the reserve in 1990 not as a biosphere polygon, but as part of the reserve itself. And this is one of the most valuable natural areas of the reserve.

There is sufficient reason to believe that under the guise of creating a new biosphere polygon, it is planned to expand the territory where the construction of ski resorts can be allowed. It would be possible to develop ski resorts throughout the territory of the Lagonaki plateau, including the Fisht-Oshten massif. This area is extremely attractive for the construction of ski resorts.



In addition to the danger of constructing ski resorts, the Caucasus State Nature Reserve is also threatened by the possible construction of a road. In October 2020, Deputy Prime Minister Yuri Trutnev instructed<sup>1</sup> to work out the possibility of building a highway connecting the Caucasian Mineral Waters and the resorts of the Krasnodar Territory. This road can be laid only through the Caucasus State Nature Reserve (see Fig. 1).

### Mountain Adygeya Nature Park (former natural monument “Headwaters of Rivers Pshecha and Pshechashcha”)

On May 21, the Government of the Republic of Adygeya adopted Resolution No. 97 which transformed the natural monument “Upper reaches of the rivers Pshekha and Pshekhashkha” into the “Mountain Adygeya Nature Park”. This modification made it possible to distinguish different zones on the territory, including an economic zone. According to the new regulation, it is allowed to build linear objects and carry out any cutting (including clear cutting) for the construction of linear objects in the economic zone.

In June the boundaries of the economic zone have been established: It corresponds to the route of the road under construction to the Lunnaya Polyana Mountain Ski Center (Fig. 2). With

a high probability, the approval of such boundaries of the economic zone means that the construction of the road to Lunnaya Polyana ski resort will continue.

Also in June, the River Tsitsa Headwaters Nature Monument was transformed into a Nature Park in the same way. Now on this territory an economic zone should be allocated, where it will be allowed to build linear objects and carry out any cutting (including clear-cutting) in dead and damaged stands (sanitary cutting), as well as for the construction of linear objects. The boundaries of the economic zone have not been established yet.

### Sochi Federal Wildlife Refuge

The Sochi Federal Wildlife Refuge is not included in the World Heritage site, but its territory is adjacent to it. In October 2020, Forest Management Regulations of the Sochi Wildlife Refuge were approved. The document presents a plan for the construction of roads (33.9 km long), power lines, a balneological center, tourist services, recreational facilities, museums, information centers, a complex of sports facilities and other facilities on the territory of the Sochi Wildlife Refuge. The location of objects strongly fragments the territory of the Wildlife Refuge and requires logging. The section of the Sochi Federal Wildlife Refuge where the infrastructure is planned to be placed borders the Caucasus Nature Reserve on three sides (Fig. 3 and 4, next page).

The development of infrastructure on the territory of the Sochi Federal Wildlife Refuge will lead to extremely negative consequences for the entire system of specially protected natural areas of the Western Caucasus World Heritage property. A large number of rare and endangered species listed in the Red Books of the Russian Federation and the Krasnodar Territory are registered in this area. This territory is necessary for the successful restoring of the Persian leopard population.

The explanatory note to the draft resolution of the Government of the Russian Federation “On expanding the territory of the Caucasus State Nature Biosphere Reserve”, according to which the entire territory of the Sochi Federal Wildlife Refuge in the upper reaches of the Mzymta river was supposed to be included in the Caucasus Nature Biosphere Reserve, states: “The area of the Wildlife Refuge is inhabited by West Caucasian tur, chamois, wild boar, Roe deer, and successful habitat of Caucasian Red deer in the middle of the Caucasus Reserve depends on its preservation within the boundaries of the Wildlife Refuge. The same applies to other forest ungulates – Roe deer and wild boar, as well as the Caucasian brown bear, for which the area of the Wildlife Refuge is one of the key areas of habitat and through which the North-West Caucasian population migrates annually.”<sup>2</sup> The construction of planned facilities will lead to the destruction of the habitat and migration routes of these species.



Fig. 2: Land in the Caucasus State Nature Reserve transferred to the Lagonaki Biosphere Polygon, and its access road. Map: Greenpeace

1 <https://tass.ru/v-strane/9614403>

2 <http://regulation.gov.ru/projects#npa=8976>



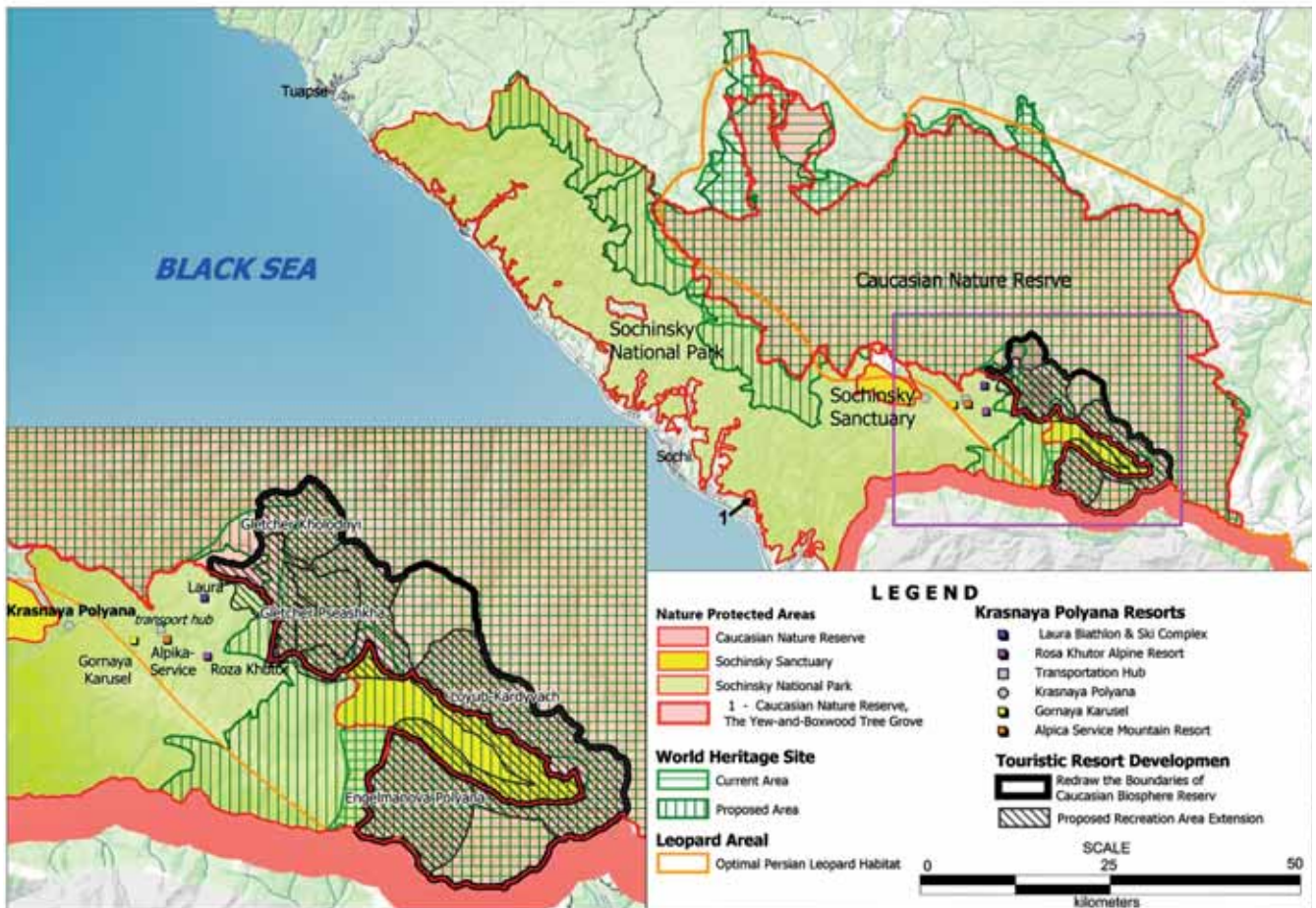


Fig. 3: Tourism development in and around Sochi Federal Wildlife Refuge.

Map: WWF

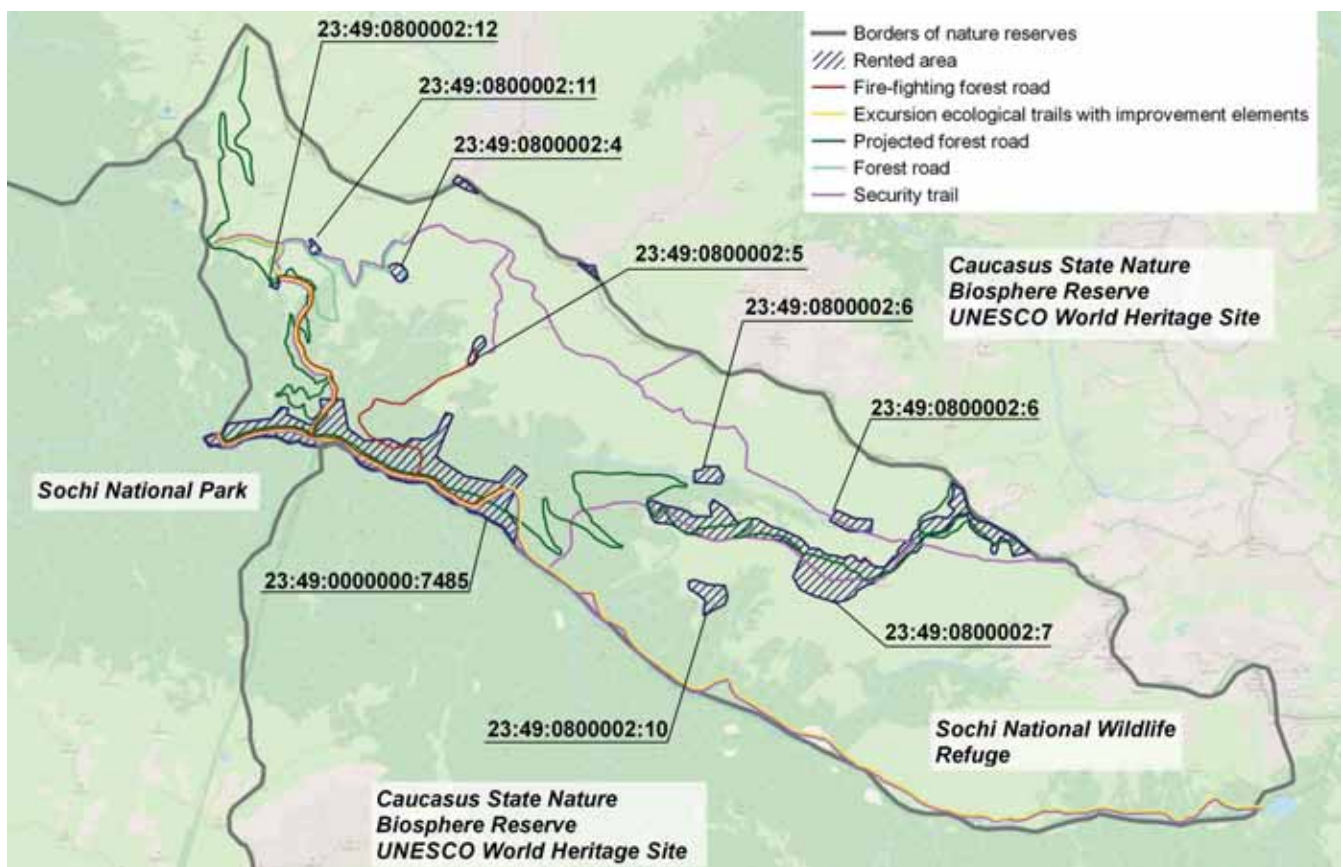


Fig. 4: Leased areas and road projects in the Sochi Federal Wildlife Refuge.

Map: Greenpeace



# Ile-Alatau State National Natural Park: Development or Destruction?

Valeriy Krylov, Sergey Kuratov and Nataliya Medvedeva,  
Ecological Society "Green Salvation"



Fig. 1: Ile-Alatau NP.

Map: Martin Lenk

The Ile-Alatau State National Natural Park (hereafter: Ile-Alatau NP) was established in 1996. It is located on the Ile-Alatau range which is the north-western shoot of the Tian Shan (Fig. 1.). The park is invaluable for the conservation of biological diversity of the region, ensuring health and well-being of the residents of the Almaty agglomeration. The park plays a critical role in mitigating the effects of climate change in the region. In 2002, Ile-Alatau NP was included in Kazakhstan's Tentative List for World Heritage nomination.<sup>1</sup>

## New threats

The year 2020 was marked for Ile-Alatau NP with the emergence of new threats and new violations of laws. As of July 1, 2017, 104 sections of the park were transferred to a long-term lease.<sup>2</sup> In 2020, under the pretext of developing tourism, 35 more plots were leased for 49 years.

Construction began on many of the leased plots and on lands that had been removed from the Ile-Alatau NP for the construction of dams. The Ecological Society "Green Salvation" received documents from the state authorities indicating that it is often carried out without an environmental impact assessment, without the conclusions of the state ecological expertise and without approved projects. These violations sparked violent public outcry. But in no case was construction stopped. It intensifies the fragmentation and destruction of ecological systems.

In addition to land leased or withdrawn from the national park, there are 167 plots of unauthorized users on its territory, covering an area of 1,304 hectares.<sup>3</sup> Some of them have been abandoned and turned into landfills. Ruins and unfinished buildings complete the picture.

Excessive economic development on the territory of the national park is evidenced by the ratio of the areas of its functional zones. In 2019, with a total park area of 199,252 hectares, it was as follows:

<sup>1</sup> Tentative List: <http://whc.unesco.org/en/statesparties/kz>.

<sup>2</sup> Adjustment of the feasibility study of the Ile-Alatau State National Natural Park regarding the master plan for development of infrastructure. "Terra" CDZ and GIS" LLP, approved by order of the Chairman of the Committee for Forestry and Wildlife of January 3, 2019 No. 17-5-6/1.—Almaty, 2019, pp.47-51: <https://www.ile-alatau.kz>

<sup>3</sup> Adjustment..., pp.10-13.

- zone of reserve regime — 62,137 hectares (31.2%);
- zone of ecological stabilization — 16,412 hectares (8.2%);
- the zone of tourist and recreational activities — 15,408 hectares (7.8%);
- zone of limited economic activity — 105,295 hectares (52.8%). It allows a wide range of different activities: grazing, building roads, recreational centers, hotels, campgrounds, museums and other tourist facilities.<sup>4</sup>



Fig. 2: Construction of a mansion in the Butakovka Canyon. September 22, 2020. Photo: Ravil Nassyrov



Fig. 3: Abandoned construction in the Kimasar Canyon. April 20, 2021. Photo: Ravil Nassyrov

In the summer of 2020, the improvement of territories and routes for visitors began on certain sections of the Ile-Alatau NP. The number of projects has increased significantly compared to last year. Often they are initiated by private investors. But these jobs do more harm than good. Firstly, there are no standards and norms for the equipment of routes in national parks in Kazakhstan. Secondly, there are no calculations of eco-

logical capacity on specific sites. Thirdly, the work is carried out by firms that have no experience in the improvement of protected areas. Measures for the preservation and restoration of ecological systems in such projects are spelled out in the most general terms

Problems with the border and the Ile-Alatau NP security zone have not been resolved. According to the law "On Specially Protected Natural Areas" (hereinafter: the Law on SPNA), the park border must be marked on the ground with special signs. State bodies have not complied with this provision of the law for 25 years. The border is marked only at checkpoints. A two-kilometer protective zone should be established and marked on the ground along the border of the park. The Almaty authorities have not done this yet. In the border areas, there are many abandoned facilities and unauthorized dumps. Pipelines and power lines are being built. Chaotic construction often leads to landslides and floods (see Fig. 4).



Fig. 4: Landslide in the Small Almaty Canyon. June 10, 2020. Photo: Ravil Nassyrov

Another factor hindering the normal functioning of national parks is the creation of new structures for their development and a course towards expanding public-private partnerships. In conditions of a high level of corruption, these mechanisms can turn into instruments for the plundering of state lands and the budget.<sup>5</sup>

## Legal situation

In 2014, 1,002 hectares in the Kok-Zhailau valley of the Ile-Alatau NP were taken out to "reserve lands" for the construction of a ski resort. As a result of a long-term public campaign in defense of the national park, in which Kazakhstanis and foreign activists participated, on October 29, 2019, the President of Kazakhstan K. Tokayev banned the construction of the re-

<sup>4</sup> Adjustment..., p.15.

<sup>5</sup> A project office for the development of five national parks of the Almaty region will open in Kazakhstan: <https://www.gov.kz/memleket/entities/eco-geo/press/news/details/114146?lang=ru> (date of the website visit—December 5, 2020).



sort.<sup>6</sup> Under the influence of the public, amendments were made to the Law on SPNA.

On October 28, 2019, amendments were made to paragraph 2 of Article 23 of the Law on SPNA, prohibiting the transfer of lands of specially protected natural areas to “reserve lands” “for the construction and operation of tourism facilities.” In other words, the rule that served as the basis for the withdrawal of Kok-Zhailau from the category of “land of protected areas” has been canceled. But the possibility of transferring land of protected areas to reserve lands has been preserved for the construction of “water facilities of special strategic importance” and the arrangement of facilities for the needs of defense and border protection.

On September 9, 2020, amendments were made to paragraph 2 of Article 23 of the Law on SPNA. “Lands of specially protected natural areas, converted to reserve lands, are transferred back to lands of specially protected natural areas if, **within one year from the date of the decision to transfer them to reserve lands, they are not transferred to other categories of lands.**” However, until April 1, 2021, the Kok-Zhailau valley was not returned to the park.

State authorized bodies understand what impetus to the development of tourism can be given by the inclusion of Kazakhstani natural sites in the World Heritage List. But within 18 years after Ile-Alatau NP was included in the Kazakhstan’s Tentative List, its nomination has not been prepared. And manipulations with the park’s lands continue.

The Law on SPNA does not establish a special status for SPNAs included in the lists of international conventions or their preliminary lists. There are no restrictions on economic activities, rent, and number of visits for protected areas, recognized at the international level.

In violation of Article 5 of the World Heritage Convention, the state authorities did not ensure “effective and active measures” for protection and conservation of Ile-Alatau NP, did not establish appropriate services for the protection and popularization of natural heritage.

In violation of paragraph 2 of Article 27 of the Convention, public authorities do not inform the public about “the dangers threatening this heritage and of the activities carried on in pursuance of this Convention.”

A similar situation is developing in the Altyn-Emel National Park. It was included in the Kazakhstan’s Tentative List for World Heritage nomination in 2002.

6 I forbid to engage in the project “Kok-Zhailau”—Tokayev: [https://tengrinews.kz/kazakhstan\\_news/zapreshchayu-zanimatsya-proektom-kok-jaylyau-to-kaev-382757/](https://tengrinews.kz/kazakhstan_news/zapreshchayu-zanimatsya-proektom-kok-jaylyau-to-kaev-382757/) (date of the website visit—February 30, 2020).

## Conclusion

Central and local authorities, business structures are actually not guided by the norms of international conventions, first of all, the Convention Concerning the Protection of the World Cultural and Natural Heritage, the Convention on Biological Diversity and the Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (the Aarhus Convention). State authorities even provide inaccurate information to the Aarhus Convention authorities regarding the situation in Ile-Alatau NP. Nevertheless, in the international arena, the Republic of Kazakhstan is making significant efforts to create an image of a country for which international obligations and the rule of law are of primary importance.<sup>7</sup>

National legislation regulating the activities of protected areas does not meet the requirements of international conventions and contains numerous contradictions that reduce its effectiveness.

State authorities do not take into account the research of international experts of the Critical Ecosystem Partnership Fund. It says about the mountain ecological systems of Central Asia: “The trends for the fragile landscapes of the high mountains are negative (i.e., increasing threats) and climate change is a threat to every ecosystem. Positive trends (i.e., decreasing threats) are primarily in areas where the state or motivated local actors have seen it in their economic self-interest to act (e.g., reduced pollution of freshwater; avoided conversion of valuable forests).”<sup>8</sup>

The development of national parks is driven by business needs. This is clearly confirmed by the content of the “State Program for the Development of the Tourism Industry of the Republic of Kazakhstan for 2019-2025.” The primitive view of the role of protected areas continues to dominate: they should make a profit from the exploitation of their land — namely its resources. No climatic, biological, geological and other features of the territory are taken into account if they do not generate income.

In general, there is a lack of understanding of the role and importance of protected areas at all levels of society, from ordinary people to officials, including the highest level.

During 2019 and 2020, Green Salvation has repeatedly drawn the attention of the Committee for Forestry and Wildlife, under whom national parks are subordinated, and other authorized

7 Over 545 million tenge is planned to be spent on PR of Almaty abroad in 2021: <https://informburo.kz/novosti/na-piar-almaty-za-rubezhom-v-2021-godu-planiruyut-potratit-bolee-545-mln-tenge.html> (date of the website visit—December 11, 2020).

8 Mountains of Central Asia Biodiversity Hotspot. Critical Ecosystem Partnership Fund – 2017, p.85: <https://www.cepf.net/sites/default/files/mountains-central-asia-ecosystem-profile-english.pdf>.

state bodies to the need to ensure the rule of law and strict compliance with international agreements.

We believe that it is necessary to introduce the following fundamental changes in the legislation and in the management of protected areas:

1. Bring the environmental legislation of the Republic of Kazakhstan in line with the requirements of international conventions.
2. To remove all third-party (outside) land owners from the borders of protected areas of republican significance.
3. Completely prohibit the transfer of protected areas from the category of "land of protected areas" to the category of "reserve land."
4. To prohibit capital construction in reserves and national parks, except for what is necessary for the functioning of their administrations.
5. To prohibit the provision of land plots of national parks for lease, with the exception of the construction of strategic facilities.
6. Local authorities of some administrative territories intervene in the conservation activities of national parks located in these territories. It is necessary to amend the law on protected areas to prohibit such interference.



# Major Weakening of Lake Baikal's Protection Regime in 2020

Eugene Simonov, Rivers without Boundaries International Coalition (RwB)  
Mikhail Kreindlin, Greenpeace Russia



## Baikal Natural Territory

Boundaries of the Baikal Natural Territory and its ecological zones, adopted by the Government of Russia, 27 November 2006 (N 1644-p)

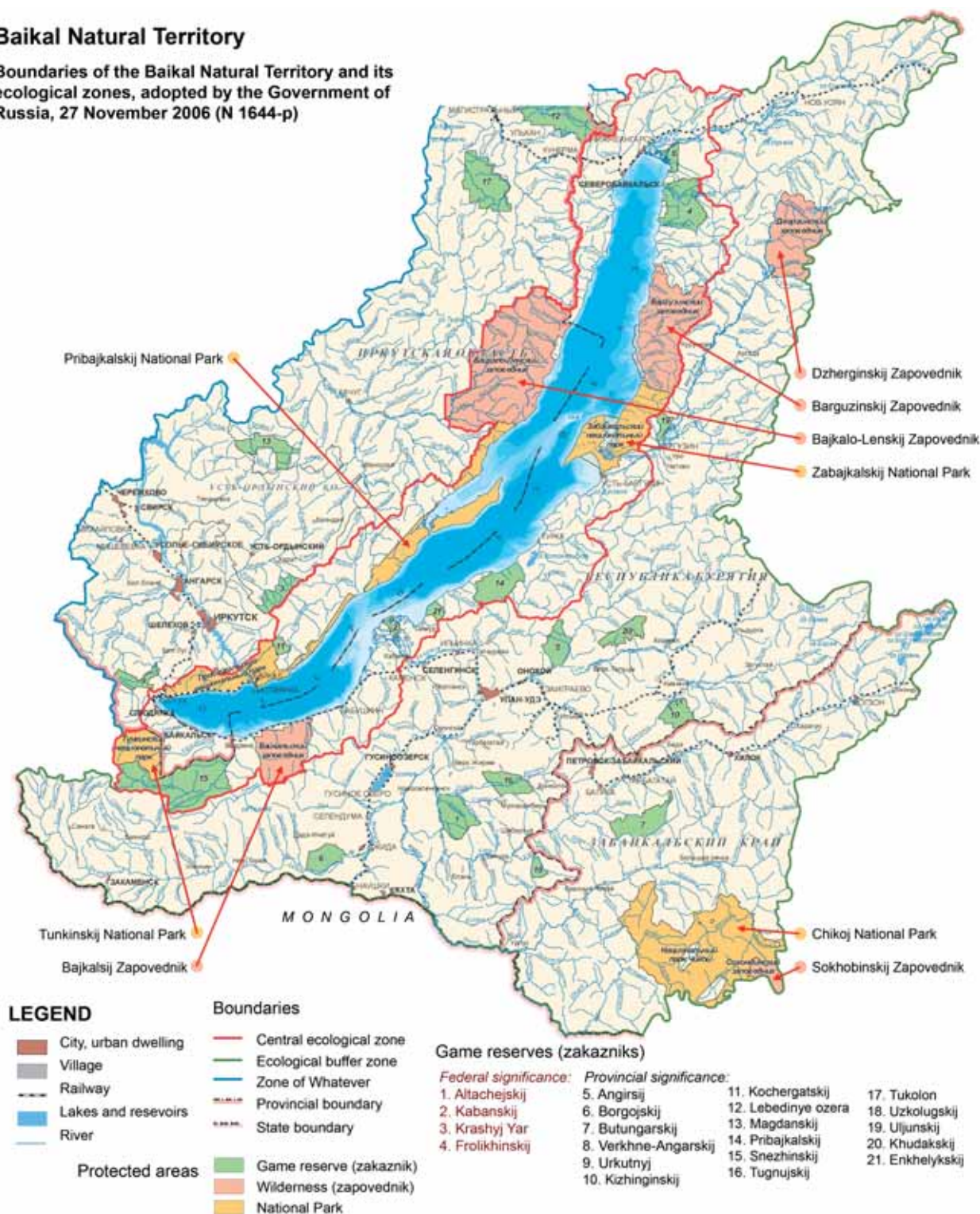


Fig. 1: The Baikal Natural Territory.

Source: [www.baikalake.ru/en/about/natmap/](http://www.baikalake.ru/en/about/natmap/) / Martin Lenk

Lake Baikal is the oldest (25–30 million years), deepest (1,637 m) and largest (23,000 km<sup>3</sup>) freshwater lake on the planet. Of its 2,595 aquatic species and subspecies of animals, 56% are endemic.<sup>1</sup> When inscribed on the World Heritage List, the Lake met all four criteria for natural properties listed under the Convention.<sup>2</sup>

The Federal “**Law on the Protection of Lake Baikal**”<sup>3</sup> was adopted in 1999, defining the Baikal Natural Territory (BNT) (Fig. 1). The Law prescribes that any project in the BNT should be subject to an Environmental Impact Assessment (EIA) and prescribes the issuance of three critical Governmental decrees: “On the List of Activities Prohibited in the Central Ecological Zone of the BNT”, “Standards for Allowable Impacts on the Unique Ecosystem of Lake Baikal” (SPI), “On the Maximum and Minimum Limits of Water Level in Lake Baikal”. These are essential to prevent the mismanagement of Baikal’s water resources, especially from the Irkutsk Hydro dam operations. The Law and those three decrees guarantee the protection of the World Heritage property.

Although Baikal is not included on the List of World Heritage in Danger, decisions on protection of the property were made during 22 out of 23 Committee sessions held since 1996.

The Lake is undergoing rapid negative changes. According to expert Dr. Oleg Timoshkin<sup>4</sup> there have been major changes in the lake ecosystem through: a massive invasion of *Spirogyra* and other green algae, secondary pollution from heaps of rotting algae, replacement of benthic and planktonic endemic species and communities by Siberian fauna and invasive species, diseases and death of endemic sponges (the main water filters), mass die-off of endemic mollusks and crustaceans, an increase in cyanobacteria, and an influx of persistent organic pollutants. Moreover, old sewage treatment plants often become a source of additional pollution.<sup>5</sup>

Throughout 2020 there were systemic attempts to weaken Lake Baikal’s protection regulations and speed up the development of tourist, infrastructure and industrial facilities in the property:



Fig. 2: Invasive green slime is taking over parts of Lake Baikal.

Photo: Viktor Lyagushkin

## 1. A new “List of Prohibited Activities”

The new List<sup>6</sup> was adopted by Government Decree #2399 on December 31, 2020. The process of drafting new regulations was conducted in a haphazard manner, without due process of impact assessment for each proposed amendment, without considering and comparing alternatives, and without proper legal analyses of their consequences.<sup>7</sup> The List consists of 25 paragraphs with 20–23 provisions resulting in weaker protection compared to the previous Regulation #643. While improvements are partial and not even ratified, the changes, weakening the protection, are dramatic and associated with the following four immediate threats:

### A: Allowing massive construction and land grabs

The single most important threat is the deleting of the prohibition for construction at “**undisturbed natural areas**” and “water protection zones”, paving the way for unconstrained construction within the boundaries of “lands of settlements” and inside “special economic zones” as well as recreational development in other parts of the World Heritage property. This will lead to massive development and a destruction of natural ecosystems, primarily at the lakeshore. Given that municipal administrations are actively proposing to extend the settlement boundaries this destruction may spread far beyond currently designated municipal lands. Development of new residences without reliable sewage treatment facilities (still totally absent along the shores in 2020) will also lead to a substantial increase in eutrophication and exacerbate current crisis of the lake ecosystem.

As a result, there is a real threat to valuable natural areas, including habitats of rare and endangered flora and fauna, for example, the relict Tengger Desert Toad (*Strauchbufo raddei*) or the Eastern Imperial Eagle (*Aquila heliaca*). Furthermore, the expansion of existing special economic zones poses a real threat to especially valuable natural landscapes, including habitats of rare and endangered fauna and flora.

1 Timoshkin, O. A., Sitnikova, T. Ja., Rusinek, O. T. et al. (2001) Annotirovannyi spisok fauny ozera Bajkal i ego vodosbornogo bassejna [Annotated list of the fauna of lake Baikal and its catchment basin]. Novosibirsk, Nauka, vol. I (Ozero Bajkal, kn. 2), p. 1679. (in Russian)

2 Full review of Lake Baikal Property in Russian and English available in “World Natural Heritage in Russia. 25 Years in Review” published by Greenpeace in 2021 <https://www.researchgate.net/publication/346965137>

3 Federal Law “On the Protection of Lake Baikal” dated 01.05.1999 No. 94-FZ

4 <https://irk.today/2019/12/11/uchenyj-so-ran-u-bajkala-nalico-vse-priznaki-bolezni/>

5 <https://irk.today/2019/12/11/uchenyj-so-ran-u-bajkala-nalico-vse-priznaki-bolezni/>

6 <http://www.garant.ru/hotlaw/federal/1431324/#ixzz6j2hVBTnw>

7 See full submission to UNESCO <https://www.researchgate.net/publication/348416512>



Despite explicit requests from scientists and NGOs the Government refused to undertake a survey of potentially affected natural habitats and assessment of the expected losses prior to removing from the regulations a ban on construction.

#### **B: Spurring development of infrastructure and food industry facilities**

The new regulations also allowed for the construction of the following facilities:

- Within the water protection zones: any flood-protection infrastructure, reservoirs for liquid waste, sewage treatment infrastructure, communication and electricity supply structures.
- In addition to that in the Central Ecological zone beyond the water protection zones and on “lands of settlements” within such zones: any infrastructure associated with the two main railroads, infrastructure for water transport, any agricultural or food processing facilities (except for those of high environmental risk), municipal sewage treatment plants, etc.

#### **C: Relaxing regulations on the handling and burning of waste**

New amendments may pave way to hazardous operations with waste materials, initially with over six million tons of sludge left at the Baikal Pulp and Paper Mill. The document allows the building of facilities needed for waste processing and the rehabilitation of the lands degraded by Baikalsk Pulp and Paper mill. It also allows for burning newly accumulated waste and using it for energy production.



Fig. 3: Lake Baikal has experienced very low water levels in recent years due to extended drought periods.

Source: [www.planet-today.com](http://www.planet-today.com)

#### **D. Selective “sanitary cutting” of forests is explicitly encouraged for “wood harvesting”**

In Russia, “sanitary cutting” is used largely not to remove sick trees, but to extract marketable timber, including places where the protective status of the area does not allow commercial logging. Sanitary cutting is associated with road building, better access to forests, and has been widely used around Baikal, especially after some catastrophic fires in areas where commercial logging is prohibited, and with the resulting nutrients released

into streams exacerbating the Lake Baikal eutrophication. The new language of the regulation explicitly legitimizes “wood harvesting” and may encourage commercial timber extraction inside the property by “selective sanitary logging”.

Moreover, there are many other “moderately” weakening amendments not associated with severe immediate damage to the property but still weakening protection, like the acclimatization of exotic terrestrial species on farms and at research facilities. Some parts of the new List are so confusing and legally ambiguous, that some newly allowed activities may have been overlooked.

## **2. Proposed permanent changes in water level regulations disregard Lake Baikal ecosystem requirements**

The Russian Government on September 3, 2020 formally declared its intent to remove in perpetuity any binding limits on artificial water-level fluctuation which should be enforced according to the Law on Protection of Lake Baikal.<sup>8</sup> Since 2001, the governmental decree “On the Maximum and Minimum Limits of Water Level in Lake Baikal” has prescribed to limit water level fluctuation caused by hydropower operations and natural factors to one meter (between 456 to 457 m above sea level in the Pacific System). In 2015 it was abruptly relaxed, temporarily, under the excuse of an “extremely low water period”. Since 2015, the World Heritage Committee has urged Russia to provide justification for the new water level regulations<sup>9</sup>, to elaborate

an EIA of potential impacts, and not to introduce any further changes in the regulations until their effects on the property are fully understood.<sup>10</sup> This decision has never been implemented. The only study commissioned by the State in 2016 to clarify the issue was not an EIA but a water management planning review without due attention to impacts on ecological processes and endemic biota.

By the end of 2017, the “temporary” allowable fluctuation was increased from 1.0 to 2.3 metres, leaving this to the discretion of the Water Management Agency thereby removing any meaningful limitations on the operations of the Irkutsk hydro-

<sup>8</sup> Draft legislation posted by the Ministry of Natural Resources <https://regulation.gov.ru/projects#npa=107272>

<sup>9</sup> <https://whc.unesco.org/en/decisions/6279>

<sup>10</sup> <https://whc.unesco.org/en/decisions/6760>

power plant. All “justifications” provided for the change in regulations are for overcoming the inability of ageing infrastructure to adapt to climate fluctuations by relaxing regulations on the Lake Baikal water level regulation. Thus, the new regulations completely disregard the “Law on the Protection of Lake Baikal” which prescribes to develop these regulations based on the ecosystem protection requirements and the prevention of potential negative impacts.

In late August-September 2020, despite a rather high inflow into the lake (4,000–5,000 m<sup>3</sup>/s), the Irkutskenergo Co. convinced the Water Management Agency that due to modernization of a turbine the flow through the Irkutskaya Hydro should not exceed 2,350 m<sup>3</sup>/s.<sup>11</sup> As a result, during September-October 2020 the lake’s water level rose to 457.13 m above sea level, which caused the flooding of infrastructure and roads, several sensitive natural areas and coastal protected areas. However, despite the emergency, the Water Management Agency refused to increase the outflow of Angara River beyond 2,800 m<sup>3</sup>/s. It was contended that this could inundate “unauthorized settlements and businesses” newly developed in the floodplain below the Irkutsk Dam, although according to the original design, there is a 6,000 m<sup>3</sup>/s release capacity.

Widespread opposition from the Government of the Buryatia Republic, scientists, local communities, and environmental NGOs<sup>12</sup> forced the Ministry of Natural Resources to postpone the long-term amendment proposed earlier and agree to conduct additional studies. However, in 2021 the Ministry wants to reissue the temporary 2020 regulations which caused the current problems.

### 3. Declared “Main Infrastructure Projects” get exemption from the EIA procedures

On July 31, 2020 Russia adopted a new Federal Law<sup>13</sup> which will, till 31 December 2024, abolish the requirement for an EIA within the boundaries of Baikal Natural Territory for “main infrastructure” projects. “Main infrastructure” may include roads, bridges, railroads, ports and airports, all with their support projects, multi-modal transportation hubs, associated civil engineering projects, communication infrastructure, etc. The same law allows for forest clearing and the change of forest lands into other uses for the purposes of infrastructure modernization associated with the Trans-Siberian and Baikal-Amur railroads, which traverse the World Heritage property for several hundred kilometres. As of September 2020, there were over 100 specific projects associated with the modernization of two main railroads within the BNT. Without prior assessment of environmental risks, they may lead to the destruction of important natural attributes of Lake Baikal as well as exposing the area to accidents and catastrophes.

### Conclusion

We believe that these changes in legislation must be recognized as a modification of the legal protective status of the World Heritage property that may affect its Outstanding Universal Value. Moreover, taking into account the observed widespread environmental degradation and the systemic management problems that Lake Baikal is facing, this property should be inscribed on the List of World Heritage in Danger immediately according to Paragraph 180b of the Operational Guidelines. Inscribing the property on this list will require a comprehensive plan for solving the accumulated problems of Lake Baikal through a Desired State of Conservation Agreement for the removal of the property from the List of World Heritage in Danger.

<sup>11</sup> Water Management Board for Reservoir Operation [http://enbv.ru/i03\\_deyatelnost/i03.12\\_regim.php](http://enbv.ru/i03_deyatelnost/i03.12_regim.php)

<sup>12</sup> Civic Chamber of Russia held special roundtable on December 23 to address this issue <https://www.oprf.ru/press/news/2617/newsitem/56374>

<sup>13</sup> <https://rg.ru/2020/08/05/regulirovanie-otnosheniy-dok.html>



# Dam Construction is Threatening the Landscapes of Dauria

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Andrey Petrov, Greenpeace Russia<sup>2</sup>,  
Eugene Simonov, Rivers without Boundaries International Coalition



The *Landscapes of Dauria* is a transboundary Russian-Mongolian natural property inscribed on the World Heritage List in 2017. The two Russian component parts are the forest-steppe part of the Daursky Nature Reserve and the main part of the Daursky Nature Reserve together with the largest part of the Dzeren Valley Wildlife Refuge. They are located in the south-east of Zabaikalsky Province and, with buffer zones of 128,888 ha, occupy a total area of 279,023 ha. The three Mongolian parts total 633,601 ha with a buffer zone of 178,429 ha. The main artery of the Torey Lakes basin, the Ulz river, runs through those protected areas, supporting lakes and wetlands with abundant waterbirds.



Fig. 1: The Torey Lakes are a critical stopover site for tundra swans. Photo: Oleg Goroshko

## The Statement of Outstanding Universal Value was based on criteria ix and x:

- (x): The transboundary serial property conserves characteristic wildlife of Daurian steppe including a number of globally threatened bird species (White-naped Crane, Hooded Crane, Swan Goose, Relict Gull, Great Bustard and Saker Falcon) as well as the endangered Tarbagan Marmot. It also provides breeding and resting habitat for birds along the East Asian-Australasian Flyway, with up to 3 million birds in spring and 6 million in autumn using the area during migration. The property also provides critical habitat to Mongolian Gazelle.
- (ix): The Landscapes of Dauria contain substantial and relatively undisturbed areas of different types of steppe, ranging from grassland to forest, as well as many lakes and wetlands which host a diversity of species and communities characteristic of the northern part of the vast Daurian Steppe ecoregion. 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.

The peculiarity of the local climate is its wide amplitude of temperature fluctuations, both daily and annual, as well as the uneven distribution of precipitation with alternating dry and water-abundant multi-year periods. The property includes the unique Torey Lakes (Zun-Torey and Barun-Torey), which are the remains of a large lake that once occupied the entire area of the Torey-Borzinsky watershed. The lakes have an unstable water regime. Over the past 200 years, with a frequency of about 30 years, they have repeatedly dried up and then refilled with water (Fig. 2).

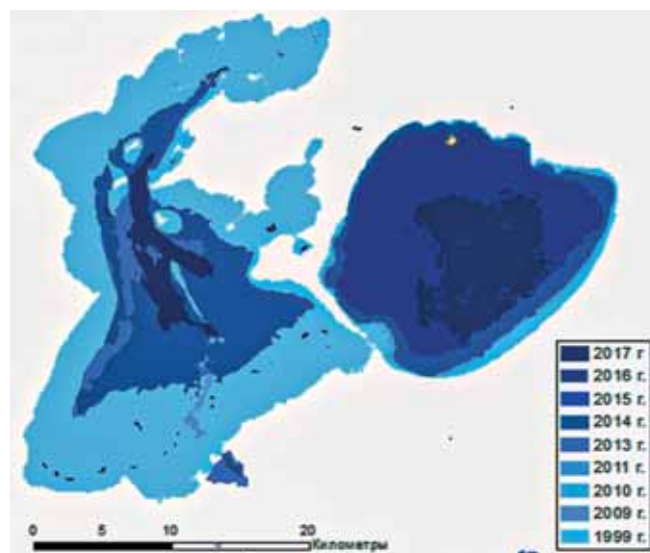


Fig. 2: The Torey lakes surface water area in different years. Map: Daursky Nature Reserve

<sup>1</sup> Dr. Kirilyuk appears in personal capacity and not as a representative of the Daursky Nature Reserve, which is only mentioned here in order to indicate his institutional affiliation.

<sup>2</sup> Andrey Petrov has recently retired from Greenpeace but is still affiliated with the organization on a voluntary basis.

Hunting and poaching, as well as fires, overgrazing, excessive water extraction and the development of the mining industry, pose a potential danger to the Outstanding Universal Value of the *Landscapes of Dauria* World Heritage property.

The rapidly growing grazing pressure in Mongolia as a whole and in the area of the World Heritage property in particular, caused by an uncontrolled increase in the number of farm animals, has already led to the onset of the resettlement of some of the Mongolian gazelles from Dornod Province of Mongolia into the Southeastern parts of Zabaikalsky Province of Russia. This may lead to an unnaturally high accumulation of gazelles in the area where the transboundary property is located. The problem is exacerbated by the presence of barbed wire fences along the Russian-Mongolian border between Lake Barun-Torey and the town of Zabaikalsk, which can cause the death of large numbers of gazelles and a reduction in species population numbers.

In 2015, Mongolia assured the World Heritage Committee of non-proliferation of mining operations in the territory of the *Landscapes of Dauria* and its buffer zone. Nevertheless, the mining sector remains the most important consumer and polluter of water in the Ulz-gol River Basin, the main tributary of the Torey Lakes. About 30 exploration and mining licenses were issued in the basin, including to two foreign companies mining copper in the buffer zone at the confluence of the Ulz-gol and Duchiyn-gol rivers.

The growing water use of the mining sector and agriculture, together with dam and water transfer projects, pose an imminent long-term threat to the integrity and natural dynamics of the steppe-wetland ecosystems of the *Landscapes of Dauria* World Heritage property.



Fig. 3: Large-scale irrigation downstream of Bayandun, July 2017. Photo: Oleg Goroshko

In 2017, the Chinese Shinshin LLC (XinXin) mining company, which built a mining and processing plant south of the World Heritage property, proposed to construct a water conduit from the transboundary Onon River to the transboundary Ulz-gol River to support mining, agriculture and “environmental needs”. Later, this proposal was raised many times by various government departments of Mongolia and included in the “Ulz River Basin Management Plan” prepared by UNDP experts using a USD 5-million grant from the Adaptation Fund. Recently it was

described by the new Head of Water Agency, Mr. Sh.Myagmar, as a part of the “Huh Mor” (Blue Horse) National Programme, which combines several most dangerous large-scale water infrastructure projects in Mongolia.

To prevent damage to the World Heritage property, the 2018 protocol of the Russian-Mongolian Environmental Cooperation Commission contained 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 the World Heritage Committee inscribing the area in the World Heritage List”.

In spite of this decision, in July 2020 the Wellmot (Вэлмoт) Company started constructing a dam across the Ulz river in the Dornod Province of Mongolia, the principal source of water for the *Landscapes of Dauria* World Heritage property. By 10 September 2020, satellite images captured a 700-meter structure built across the floodplain, identical in its location and orientation with the dam design shown in the tender documents. According to these tender documents, the earthen dam, 9–12 meters high and 700 meters long, will block the Ulz River 30 kilometers upstream and create a reservoir with a volume of 27 million cubic meters. For a river with an average flow of 7 m<sup>3</sup>/s, it is an immense structure.



Fig. 4: Construction of the dam across the Ulz river floodplain, September 10, 2020. Satellite image: Planet

The official justification for the dam is “preventing the river from drying” while the name of the project is “Onon-Ulz”, suggesting a possible further attempt for inter-basin water transfer from the Onon river. However, according to local informants it was resisted by the Mongolian residents of the Onon valley. In reality this construction seems to be ensuring a steady water supply to mining enterprises as well as expanding irrigated agriculture as the second largest water consumer.



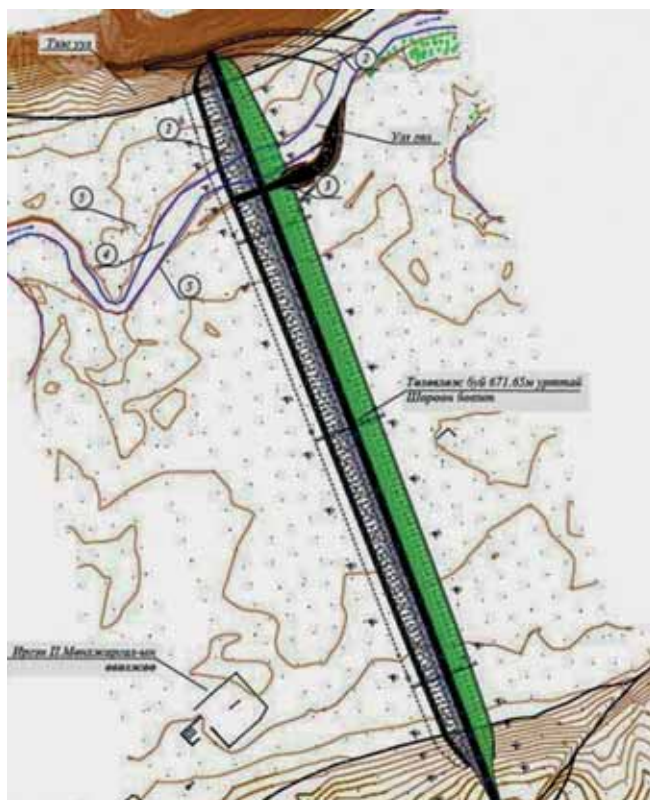


Fig. 5: Plan of the Ulz river dam.

Source: Tendering Documents for the "Onon-Ulz" water infrastructure construction project

The large infrastructures now being built will most likely have a negative impact on the following natural features of the World Heritage property:

- Water regime of floodplain and lacustrine wetlands of the World Heritage property
- Sediment flow and erosion patterns and habitat conditions in Ulz river and its wetlands where rare and migratory water-fowl are found;
- Migration of aquatic species and re-colonization of downstream habitats after drought periods, being an essential part of the natural cycle;
- Availability of water in dry periods, due to the evaporation of at least 7 million m<sup>3</sup> annually from the reservoir surface, which is planned to exceed 10 square kilometers;
- Potential damage to the World Heritage wetlands should also be considered in case of dam collapse resulting in a massive flash flood.

The degree of disruption and threat to the World Heritage property will depend on the detailed overall design of the "Onon-Ulz" water infrastructure project.

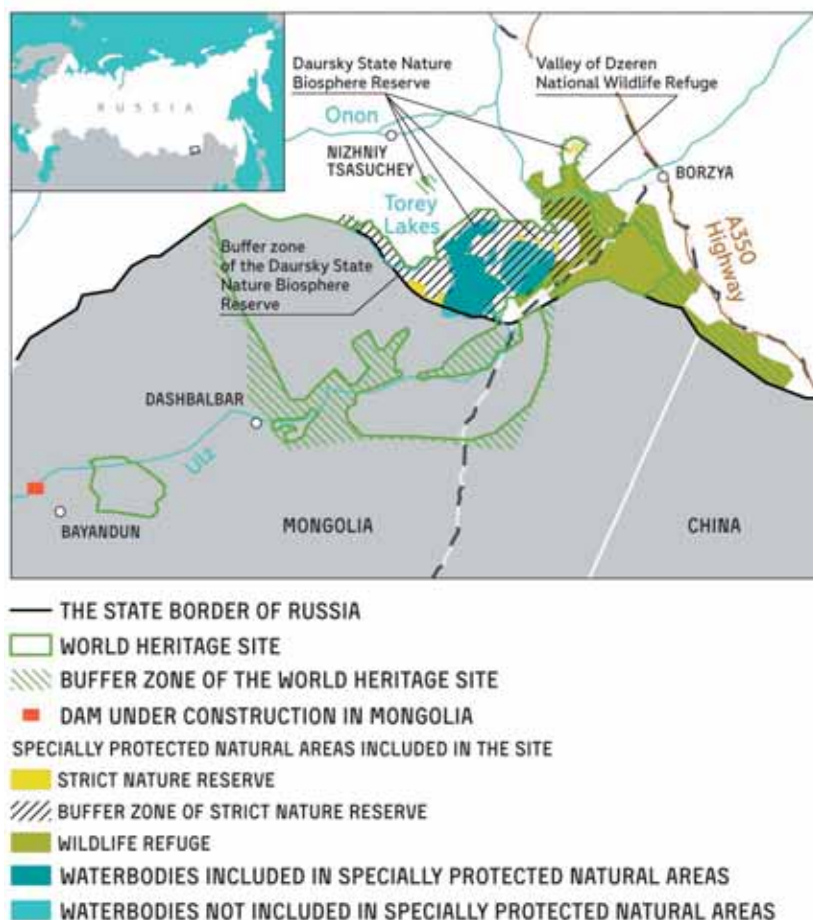


Fig. 6: The Landscapes of Dauria World Heritage property and the location of the Ulz River dam.

Map: Greenpeace

- Given the cyclical character of climate in Dauria, it should be expected that damming Ulz River will decrease the number of years within the climate cycle suitable for successful reproduction of endangered wetland-dependent species e.g., White-naped Crane (*Grus vipio*). The creation of this reservoir may also facilitate the development of additional mining and ore processing or large-scale irrigation facilities with associated pollution, as well as aquaculture development resulting from the introduction of exotic species.
- If the Onon river waters are transferred to Ulz to "sustain perennial flow", it will fully arrest the natural ecosystem dynamics in the Torey Lakes and transform them into permanent saline-alkaline water bodies with decreasing biodiversity and bio-productivity.
- If construction works will be extended to the Doch Gol tributary of the Ulz River, this will fully disrupt natural flow dynamics, first and foremost in the Mongol Daguur Nature Reserve, and will also disturb the Mongolian Gazelle herds who frequent the remote Doch valley.

The most puzzling aspect of the "Ulz River ecological rescue" project is that at the moment it **does not to make any practical sense**. It was started at a time when the long dry period had ended and changed to a water-abundant phase



in a regular climate cycle. Therefore, in the next 15–20 years the Ulz River should have sufficient water resources to support the local economy without any artificial modification. As of today, the declared project goal of “sustaining Ulz river flow” will be implemented by forces of nature and the costly dam will be quite useless for its declared purposes until the next dry period which may start around 2035.



Fig. 7: The Torey Lakes started filling up again in October 2020. Photo: Tatiana Tkachuk

This discrepancy makes some observers suggest that the real purpose of the project may be in supporting water transfer further south to the mining areas around Gurvanzagal and Mardai and using this water at ore-processing plants. Still there are many other less costly measures that could support such water supply and cause much less harm to the key natural amenities of the area. Another complementary hypothesis is that the project is driven by corruption and election-related considerations, when money is allocated to predetermined political allies and where the end-effectiveness of the investment does not matter whatsoever. The former minister and parliament member named by the Montsame Agency as the main project proponent, in 2020, was sentenced to 6 years in prison for corruption.

The Government of Mongolia started dam construction without notification to the Russian Authorities or submitting a transboundary Heritage Impact Assessment to the World Heritage Centre. These actions contradict **articles 4, 5 and 6 of the World Heritage Convention and paragraphs 118-bis and**

**172 of the Operational Guidelines for Implementation of the Convention.** Since Mongol Daguur and Daurisky PAs are also Ramsar sites there is a contradiction with **articles 3 and 5 of the Ramsar Convention on Wetlands of International Importance.**

The Rivers without Boundaries Coalition sent a report to the World Heritage Centre in September 2020 calling for the immediate discontinuation of the construction works and an undertaking to present a comprehensive Environmental and Social Impact Assessment (ESIA) with special attention to impacts on the Outstanding Universal Values of the World Heritage property, and with due public consultation involving all affected parties.

In its submission to the World Heritage Centre, “*Dam Construction Is Threatening the Landscapes of Dauria World Heritage*”, the RwB suggests that if the Mongolian Authorities proceed with the dam construction, then the transboundary “Landscapes of Dauria” should be inscribed on the “List of World Heritage in Danger” according to Article 11 of the Convention and paragraph 180 of the Operational Guidelines.

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# A Resort Project and Ocean Disaster in the Volcanoes of Kamchatka World Heritage Property

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## The “Three Volcanoes Park” Resort

In 2019, it was decided that the “Three Volcanoes Park” resort will be partially located on the territory of the Southern Kamchatka Nature Park, which is a part of the “Volcanoes of Kamchatka” World Heritage site.

Since the concept of this resort is not compatible with nature conservation activities, the Government of the Kamchatka Territory decided to exclude the territory of the resort from the nature park boundaries. In June 2020, the Acting Governor of the Kamchatka Territory signed a resolution that changes the boundaries and protection regime of the Southern Kamchatka Nature Park.

Firstly, the territory from the top of the Vilyuchinsky Volcano to the Pacific coast – an area of 15,096.7449 ha – was excluded from the northern cluster of the park. The Vilyuchinsky volcano, Zhirovaya Bay, and Vilyuchinskaya Bay are no longer part of the Nature Park.

Secondly, the resolution approves the Regulation for the Southern Kamchatka Nature Park that weakens the protection regime of the Nature Park. The new Regulation for the entire territory of the Nature Park allows the construction and reconstruction of linear objects and clear-cutting.

The territory excluded from the boundaries of the Nature Park was left without any legal protection of its natural systems.

According to the Red Book of the Kamchatka Territory and the “Proposal for minor modifications to the boundaries of World Heritage property Volcanoes of Kamchatka” prepared by the Institute of Geography of the Russian Academy of Sciences and the Kamchatka Branch of the Pacific Institute of Geography of the Far-Eastern Branch of Russian Academy of Sciences, the excluded territory is inhabited in particular by Steller’s Sea eagle (*Haliaeetus pelagicus*) and Peregrine falcon (*Falco peregrinus*). It is impossible to preserve these unique natural systems in the absence of the status of a protected natural area and in the context of a major tourism project involving the construction of a large number of infrastructure facilities.

Allowing the construction of linear objects in the zone of special protection and the zone of protection of unique natural systems and objects of the Southern Kamchatka Nature Park, as well as allowing clear-cutting in the zone of special protection, will cause damage to the protected natural systems and objects of the Nature Park, change landscapes, and destroy the habitat of rare species.



Fig. 1: New boundaries of the South Kamchatka Nature Park.

Map: Alexandra Pilipenko / Greenpeace



Concern about the planned resort is expressed not only by public organizations. In the summer of 2020, the report of a Joint UNESCO World Heritage Centre / IUCN Reactive Monitoring Mission to the World Heritage Property stated that

*“the “Three Volcano Park” is incompatible with the preservation of the integrity of the property and if allowed to proceed, the project would result in a severe deterioration of the natural beauty and scientific value of the component South Kamchatka Nature Park, to an extent that might warrant the inscription of the property on the List of World Heritage in Danger”<sup>1</sup>.*

The report also indicates that if the State Party intends to submit a boundary modification request for the property, such a boundary modification will have to be considered as a significant boundary modification. For today, Russia sent a request to the World Heritage Center on minor modifications of the boundaries of the property. The proposed boundary modification should be considered at the next session of the World Heritage Committee.

### Marine fauna death in Kamchatka

In mid-September, the seawater along the southeastern coast of Kamchatka (Fig. 2) changed its colour and took on an unpleasant smell. People reported health effects. Dead sea animals washed ashore, leaving carcasses along many of the beaches.

Locals, especially surfers, were the first to post about the environmental disaster on social media. They said that after surfing they were experiencing sore throat, eye pain, and itching skin from being in contact with the water. Some of them reported nausea and vomiting<sup>2</sup>.

The reasons for the death of animals, and the area of possible contamination



Fig. 2: Area of confirmed ocean pollution at the coast of Southern Kamchatka.

Map: Igor Giushkov / Greenpeace

are still unknown. Greenpeace Russia sent a group of employees and volunteers there who sailed along the coast by boat to the south and found areas with yellow foam on the water (Fig.3), including in Vilyuchinskaya Bay which adjoins the former territory of the Southern Kamchatka Nature Park (before the change of boundaries that took place in 2020).



Fig. 3: Pollution of the coastal waters of Southern Kamchatka.

Photo: Matvey Paramoshin / Greenpeace

<sup>1</sup> <http://whc.unesco.org/en/documents/183777>

<sup>2</sup> <https://www.greenpeace.org/international/story/45476/environmental-disaster-kamchatka-russia>

According to the Proposal for Minor Modifications to the Boundaries of the Volcanoes of Kamchatka World Heritage Property, there are 5–6 pairs of Steller’s Sea-eagle (*Haliaeetus pelagicus*) in the territory that is being withdrawn, which constitute approximately 20–30% of the nesting quantity of the species in the Southern Kamchatka Nature Park, and approximately 5–7% of the quantity in the territory of the entire Volcanoes of Kamchatka World Natural Heritage Site.

The eagle feeds mainly on fish, so its nesting population in this area could be affected if water pollution leads to toxic contamination of fish. Salmon can also suffer from this pollution. Thus, damage can be caused to the OUV of the property.

Later, an expedition of the Kronotsky Nature Reserve with the participation of Greenpeace discovered a mass death of underwater animals in the area of Utashud Island in the water area of the Southern Kamchatka National Wildlife Refuge. Also, the mass death of marine animals was recorded on the western coast near the village of Ozernovsky. This means that, with a very high probability, the entire water area of the Wildlife Refuge was a zone of ecological disaster. That is, a significant part of the “Volcanoes of Kamchatka” World Heritage site suffered from an environmental disaster.



Fig. 4: Masses of dead sea urchins washed ashore in Southern Kamchatka.

Photo: Vasily Yablokov / Greenpeace

The waters of the Southern Kamchatka Wildlife Refuge and around them are rich in rare and endangered species. These are several species of cetaceans and sea birds, Steller’s sea eagle,

and sea otters. The sea otter are especially vulnerable since they feed on sea urchins, the mass death of which (Fig. 4) can lead to a decrease in the sea otter population, the number of which has already been falling recently<sup>3</sup>.

Unfortunately, the reasons for the mass death of marine animals have not yet been established although many government agencies and independently of them Greenpeace have conducted studies of soil, water, and dead animals<sup>4</sup>. A large number of pollutants have been discovered, but according to scientists they cannot be the cause of such a massive death. Official authorities adhere to the version that the catastrophe occurred as a result of an outbreak of dinoflagellate reproduction.

<sup>3</sup> <https://tass.ru/v-strane/9467659>

<sup>4</sup> <https://greenpeace.ru/news/2020/10/14/rossijskij-greenpeace-poluchil-pervye-rezultaty-prob/>

# Selous Game Reserve – Where Do We Go From Here?

Günter Wippel, uranium network



Tanzania's government under (now deceased) President Magafuli of Tanzania had ordered the Selous Game Reserve WHS to be 'cut up' without consulting UNESCO in order to build a large hydropower dam on the Rufiji river which runs through the middle of the reserve. He ignored UNESCO as well as the status of the area as a World Heritage site, and, as a result, the Selous Game Reserve has been on the List of World Heritage in Danger since 2014. Recent events on the ground do not suggest that this will be changed anytime soon.

## Progress of the Rufiji Hydro Power Project

Work on the Stiegler's Gorge Dam, named Rufiji Hydro Power Project (RHPP), renamed lately into Julius Nyerere Hydropower Project, is proceeding, and changes to the landscape tend to be irreversible.

In mid-November 2020, construction of a 700-meter diversion tunnel for redirecting the Rufiji River's waters away from the original riverbed to enable the building of the actual main dam in the riverbed was completed.<sup>1</sup> It was praised as the comple-

tion of the 1st stage of the project. A ceremony was held at the construction site, including high-ranking political representatives from Egypt and Tanzania, together with representatives of construction companies Arab Contractors and Elsewedy Electric.<sup>2</sup>

According to a video<sup>3</sup> posted by TANESCO, the diversion has been completed and the Rufiji river is now re-directed through the diversion tunnel; construction of the main dam in the Rufiji riverbed can start (see Fig. 1).

## Serious concerns ignored by Tanzanian Government

Serious concerns in regard to the project had been voiced repeatedly by the World Heritage Committee as well as by UNESCO Director General, Audrey Azoulay. In a letter to the late President Magafuli, she wrote:

<sup>1</sup> Tanzania is Constructing Africa's 2nd LARGEST Hydro-power dam – Julius Nyerere Hydropower Station, May 28, 2020 by Arab Contractors and Elsewedy Electric, <https://www.youtube.com/watch?v=XGG5-mwPt4g>

<sup>2</sup> Egyptian Officials Witness Tanzania's Rufiji River Ceremony, by Nawal Sayed November 18, 2020, <https://see.news/egyptian-officials-witness-tanzania-rufiji-river-ceremony/>

<sup>3</sup> Uchepushaji maji yam to Rufiji kwenye handaki ili kupisha ujenzi wa tuta kuu, bado siku moja, [www.youtube.com/watch?v=VaMRkLvpg6g](https://www.youtube.com/watch?v=VaMRkLvpg6g), posted Nov 17, 2020



Fig. 1: The Rufiji dam construction site. In the middle, the original river bed, now dammed off, on the left the entrance to the diversion tunnel.

Photo: Screenshot from [www.youtube.com/watch?v=VaMRkLvpg6g](https://www.youtube.com/watch?v=VaMRkLvpg6g)



*"... we are concerned that a decision to go forward with the construction of the Stiegler's dam is likely to have a devastating and irreversible impact on Selous' unique ecosystem, and that it will jeopardize the potential of the site to contribute to sustainable development."*<sup>4</sup>

IUCN had commissioned an 'Independent technical review of the "Strategic environmental assessment for the proposed Rufiji Hydro Power Project" in the Selous Game Reserve World Heritage site, Tanzania'<sup>5</sup> with a devastating result in regard to Tanzania's Strategic Environmental Assessment (SEA) of the project, basically saying "too little, too late", and biased: "... consistently over-rate positive impacts of the Rufiji Project, and to under-rate its negative impacts ...".

Concerns were also raised by others in regard to impacts on the Selous Game Reserve but also in regard to the impact it will have on downstream communities and environment outside the World Heritage site, to the economic viability of the project, the stress it puts on Tanzania's budget, and in regard to the expertise of the Egyptian companies who both have no previous experience in building any such projects.<sup>6</sup>

IUCN also pointed to a general lack of public consultation and poor efforts to address the concerns of key stakeholders who were consulted.<sup>7</sup>

The Tanzanian Government has consistently ignored, downplayed or rejected any concerns in regard to the project, by repeating, for example, that the project would impact only 3% of the World Heritage Site, denying the fact that there are interdependencies in ecosystems.

International bodies such as the UNESCO WHC as well as international NGOs such as IUCN, WWF and others who have called upon the Government of Tanzania to abandon the project, were ignored.

National criticism of the project received a harsh warning: Kangi Lugola, the country's minister for home affairs, said in a state-



Fig. 2: Aerial view of Stiegler's Gorge before...



Fig. 3: ... and during construction of the dam.

Source: <https://www.facebook.com/groups/theconservationimperative>

ment: *"The government will go on with the implementation of the project whether you like it or not. Those who are resisting the project will be jailed."*<sup>8</sup>

This statement is in line with earlier statements by (now deceased) president Magafuli pointing out that his government will go ahead with the project "come rain come sunshine", the non-acceptance of environmental concerns<sup>9</sup>, and with his government's stance on opposition in general ("Tanzania police to 'cripple' anti-Magafuli protesters", 21 March 2018<sup>10</sup>).

## Impacts of the "cut-up SGR" decision

As explained in World Heritage Watch Report 2020 (page 44-46), President Magafuli had ordered to cut up SGR into Nyerere National Park and Selous Game Reserve (see Fig 4).

<sup>4</sup> <https://whc.unesco.org/en/news/1785>

<sup>5</sup> <https://portals.iucn.org/library/sites/library/files/documents/2019-044-En.pdf> (published April 2019)

<sup>6</sup> Heritage Dammed - Water Infrastructure Impacts on World Heritage Sites and Free Flowing Rivers, June 2019, ISBN 978-5-4465-2345-0, DOI: 10.13140/RG.2.2.33037.38883, <https://world-heritage-watch.org/wp-content/uploads/2019/06/2019-Heritage-Dammed-Report.pdf>  
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Independent technical review of the "Strategic Environmental Assessment for the Rufiji Hydropower Project" in Selous Game Reserve World Heritage site, Tanzania: November 2019. Gland, Switzerland: IUCN. iv+ 17pp

<sup>7</sup> IUCN press release  
[www.iucn.org/news/world-heritage/201912/iucn-outsourced-paper-finds-no-proof-rufiji-dam-project-can-meet-tanzanias-development-needs](https://www.iucn.org/news/world-heritage/201912/iucn-outsourced-paper-finds-no-proof-rufiji-dam-project-can-meet-tanzanias-development-needs)

<sup>8</sup> Tanzania's hydroelectric dam project charges ahead despite environmental concerns – World Finance, Nov 1, 2019, [www.worldfinance.com/featured/tanzanias-hydroelectric-dam-project-charges-ahead-despite-environmental-concerns](https://www.worldfinance.com/featured/tanzanias-hydroelectric-dam-project-charges-ahead-despite-environmental-concerns) and <https://allafrica.com/stories/201805230131.html>

<sup>9</sup> [www.ippmedia.com/en/news/come-rain-or-shine-well-build-stieglers-project](https://www.ippmedia.com/en/news/come-rain-or-shine-well-build-stieglers-project)

<sup>10</sup> [www.theeastafrican.co.ke/news/Tanzania-police-cripple-anti-Magafuli-protesters/2558-4351898-xvkvrq/index.html](https://www.theeastafrican.co.ke/news/Tanzania-police-cripple-anti-Magafuli-protesters/2558-4351898-xvkvrq/index.html)

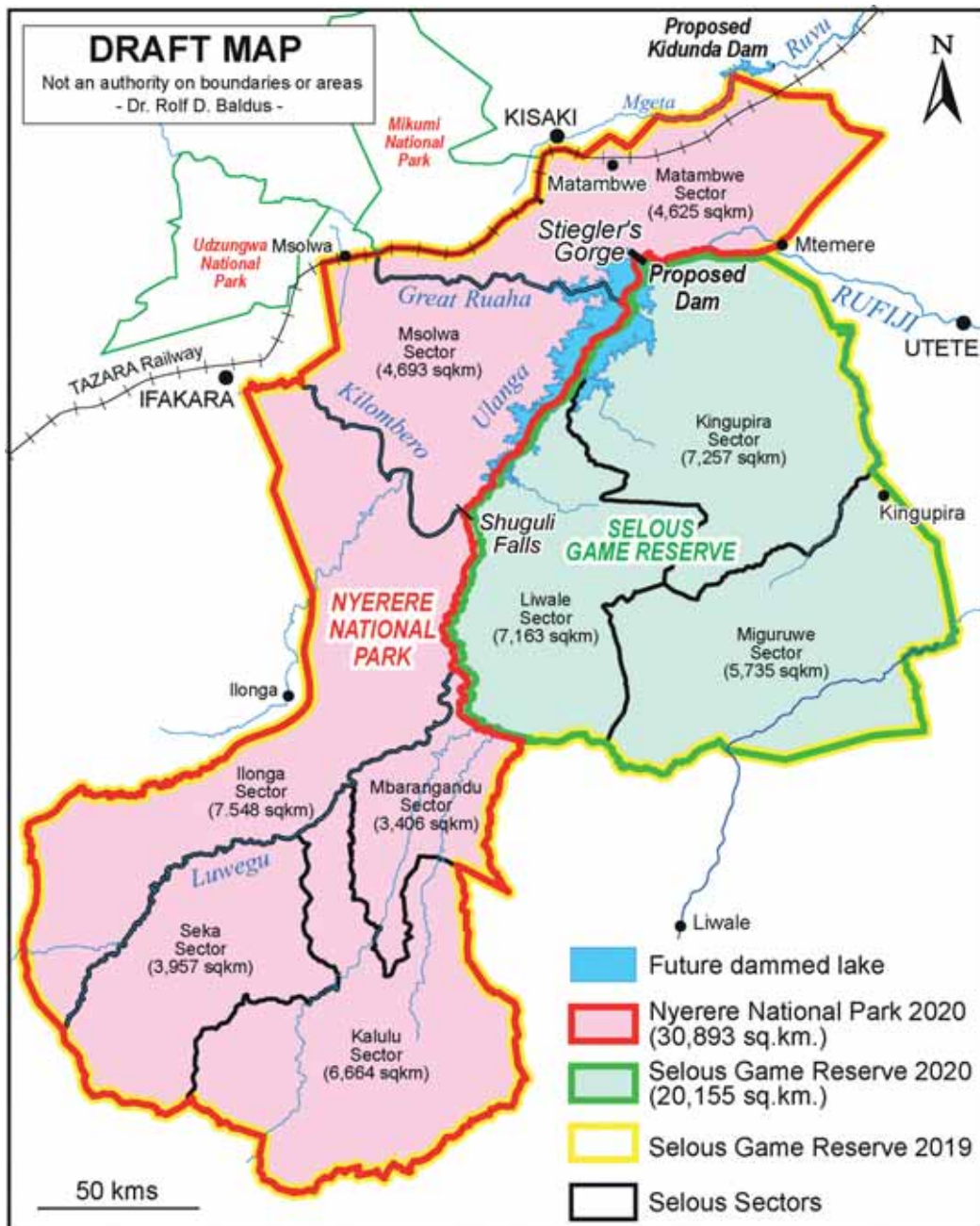


Fig. 4: Indicative map of the former Selous Game Reserve, the two newly-created protected areas on its territory, and the Stiegler's Gorge dam in the middle.  
Source: Archiv Baldus

The National Park Act of Tanzania<sup>11</sup> explicitly allows mining in a National Park (Section 22), although conditions may be imposed, however *"the minister shall not impose any conditions inconsistent with the nature of any such mining right"*. The establishment of Game Reserves is regulated under The Wildlife Conservation Act (2009) Section 20(3)<sup>12</sup>, and allows prospecting or mining in a game reserve.

Thus, establishing a National Park and a Game Reserve under Tanzanian laws is opening up the area of WHS SGR to potential resource exploitation, whereas mining had been regarded as incompatible with the World Heritage Status of a site.

### The continuing threat of uranium mining

The Mkuju River uranium mine project in the southwestern part of the Selous Game Reserve, had been postponed due to the low price of uranium. Two major uranium companies reduced their production<sup>13</sup>, hoping to boost the price. Uranium market experts projected an oversupply of uranium until the beginning of the 2020s, while after 2020 demand could exceed production<sup>14</sup>, creating an economic chance for new uranium projects.

<sup>11</sup> The National Park Act [www.maliasili.go.tz/resources/view/the-national-parks-act-cap-283](http://www.maliasili.go.tz/resources/view/the-national-parks-act-cap-283)

<sup>12</sup> <http://extwprlegs1.fao.org/docs/pdf/tan97858.pdf>

<sup>13</sup> Kazakh state-owned uranium company KAZATOMPROM cut its uranium production by 20% since 2018, and Canada's CAMECO suspended operation of its largest mine, Mc Arthur River, since July 2018.

<sup>14</sup> The Impact of Global Nuclear Fuel Inventories on Forward Uranium Production, by N. Carter, UxC [https://inis.iaea.org/collection/NCLCollectionStore/\\_Public/49/097/49097415.pdf](https://inis.iaea.org/collection/NCLCollectionStore/_Public/49/097/49097415.pdf) plus information not available on internet

In June 2020, Tanzanian IPP Media launched an article *“Uranium mining firm Mantra Tanzania is set to use the environmental friendly in-situ-recovery (ISR) mining method in the Mkuju River Project ...”*<sup>15</sup>

In fact, the mining license granted to the operator (Mantra) in 2012 is based on an Environmental and Social Impact Assessment for open-pit mining – not for in-situ recovery, a fundamentally different method of mining.

The WHC has repeatedly insisted that in case in-situ recovery (in-situ leaching) will be used at Mkuju, a new ESIA will be needed.<sup>16</sup> Obviously, no new ESIA has been submitted so far.

### Uncertainties prevail

With no annual WH Committee session in 2020 due to COVID-19, and no virtual replacement held, no decision in regard to World Heritage site SGR was taken. As of 15 April 2021, the State Party of Tanzania had not submitted a Statement of Conservation Report to the WHC. No other communication between the WHC and the State Party is known in public. As to our knowledge, no invitation has been issued by the State Party for a monitoring mission by WHC / IUCN to Tanzania, which would be a prerequisite for a WHC decision.

When Tanzania’s President John Pombe Magafuli passed away on March 17, 2021, Vice-President Ms. Samia Suluhu Hassan was sworn in as the new president of the country. Her position towards UNESCO and the status of Selous Game Reserve is still to be seen. As of now, mid-April 2021, four weeks after the new president took office, it is difficult to evaluate which course the country will take. Some of her remarks, however, give raise to concern.

“We should look at the possibility of **reducing the size of the national parks** vis-à-vis benefits of mining the minerals,” President Hassan said.<sup>17</sup> “Negotiation teams should hasten the process **so that the companies can start mining**,” she said, and “By the way the animals do not eat the minerals, we should look at the opportunity cost of mining and that of not mining,” she added.<sup>18</sup> Her stance toward the UNESCO World Heritage Convention is not publicly known yet.

Press reports quoted the latest Auditor General’s report that revealed that the decision for the Julius Nyerere Hydro Project was based on a 1970 feasibility study – without appropriate updating of the impacts of the highly controversial project, and in violation of various required legal provisions of the country. Consequences are not known yet<sup>19</sup>.

### Recommendation

The Selous Game Reserve has been Africa’s largest protected area, larger than Switzerland, inscribed under two criteria (ix and x) in the World Heritage List. Without doubt, with construction of the ‘Julius Nyerere Hydropower Project’, the infrastructure coming with it, and additional projects with negative impacts such as Kidunda dam and the continuous threat of a uranium mine in the southwest area of the property, the OUV of the Selous Game Reserve might well be damaged so seriously that the Property should be delisted.

However, heritage is obviously a long-term matter, involving not only our ancestors and current generations, but also generations into the future to whom such sites and places shall be passed on as undisturbed as possible. The question then arises what will be the best possible way to pass on the remaining site to future generations?

Delisting the site would release a very large area into the sole responsibility of the Tanzanian government – risking that the area will be opened up to more or less unrestricted resource extraction and unsustainable tourism development for all future times. Delisting – although justifiable – may not be regarded as a wise decision from a perspective of 10, 20 or 50 years in the future.

Keeping Selous Game Reserve on the List of World Heritage in Danger would retain a minimum influence of UNESCO on the site. In the meantime, IUCN should explore whether the OUV of the World Heritage can be saved on the basis of the two newly-created protected areas, possibly with additions elsewhere.

<sup>15</sup> Uranium mining firm to use safe, eco-friendly technology, IPP Media, 6 June 2020, <https://www.ippmedia.com/en/features/uranium-mining-firm-use-safe-eco-friendly-technology>

<sup>16</sup> WHC Decision 2017: 41 COM 7A.17, Nr. 8b, WHC Decision 2018: 42 COM 7A.56, Nr. 13

<sup>17</sup> President Samia heralds the beginning of a new era, The CITIZEN, April 07 2021 <https://www.thecitizen.co.tz/tanzania/news/president-samia-heralds-the-beginning-of-a-new-era-3352284>

<sup>18</sup> Mining industry welcomes President’s recent directive, The Citizen, April 08 2021 <https://www.thecitizen.co.tz/tanzania/news/-mining-industry-welcomes-president-s-recent-directive-3354060>

<sup>19</sup> Julius Nyerere Hydroelectric Power Project using 1970 feasibility study, The CITIZEN, April 08 2021 <https://www.thecitizen.co.tz/tanzania/news/julius-nyerere-hydroelectric-power-project-using-1970-feasibility-study-3354208>



# Bangladesh Must Halt High Carbon, Highly Polluting Industries Near the Sundarbans

Sultana Kamal, National Committee for Saving the Sundarbans



The National Committee for Saving the Sundarbans (NCSS) is a coalition of more than 50 civil society and non-governmental organizations of Bangladesh with shared interest in the environment. We are deeply concerned that the Government of Bangladesh (GoB) is not paying any meaningful attention to the 2017 and 2019 decisions of the World Heritage Committee (WHC) while pursuing a reckless industrialization agenda.

Located in the Ganges Delta at the Bay of Bengal, the Sundarbans is the largest mangrove forest on earth, teeming with fish and wildlife including endangered tigers, otters, freshwater dolphins, crocodiles, turtles, and more. The ecosystem provides food, livelihoods, carbon storage and protection from cyclones and tsunamis for millions of people. It will only be resilient to climate change with clean air, clean water, intact habitats, and viable populations of endangered species. Heavy industrialization in and around the ecosystem threatens successful conservation.

In May 2020, cyclone Amphan hit the Ganges Delta with storm surges up to 5 m, wind speeds of 160km/hr, and seawater flooding up to 15 km from coastlines. Hundreds of lives were lost, farms ruined, and infrastructure washed away. Inland destruction would have been much worse without the mangroves reducing wind speed and storm surges.

## 1. Heavy industrial projects moving forward in 2020

In 2017, the WHC's decision 41 COM 7B.25.4 requested Bangladesh to "to ensure that any large-scale industrial and/or infrastructure developments will not be allowed to proceed before the SEA [Strategic Environmental Assessment] has been completed". In 2019, WHC decision 43 COM 7B.3.7.7 **"expresses concern** that 154 industrial projects upstream of the property are currently active, and **reiterates** the Committee's request in Paragraph 4 of Decision 41 COM 7B.25."

A precautionary approach to implementing these decisions should have meant *halting* the operations of the 154 upstream industries, and *not proceeding* with construction of new large-scale industries, particularly the coal-fired power plants at Ram-pal, Taltali and Payra/Kalapara. Instead, in its 2020 State of

Conservation Report to UNESCO (SOCR), the Government of Bangladesh (GoB) twisted the meaning of the decisions, pretending they refer only to "environmental clearance or permission" "adjacent to the Sundarbans World Heritage property" "since 2017".<sup>1</sup>

The SOCR also obfuscates possible impacts of the 130 orange category industries as "mostly small scale enterprises based on agrarian livelihood" and "cottage industry types". But these industries include hotels, restaurants, fish farms, a Bitumen storage facility, a plastic recycling factory, a towel factory, packaging factory, a condensed natural gas filling station, and brick kilns so polluting they are required to be shut by 2025. The SOCR statements that most of these "do not emit or discharge any air/water pollutants to the surrounding environment", and "no significant discharge is visible" belies the total lack of air, water and ecosystem monitoring.

The 2020 SOCR report states that 20 highest impact "red category" industries continue to operate in the Ecological Critical Area (10km buffer zone from edge of Sundarbans Reserve Forest). These include cement mills, LPG bottling, cylinder manufacturing, petroleum refinery, jetty, cigarette packaging, artificial doll hair, car seat heaters and metal fencing. The report fails to include results of environmental monitoring and compliance of these industries, and fails to mention the High Court decision of 2018 that found that none of these industries should have been granted permits to begin with.

The 2020 SOC Report claim of "no visible emissions" from Mongla industries is not credible, given that long term ecological monitoring by University of Khulna Professor A. H. Chowdhury has documented major declines in biological productivity and a doubling of air pollution at Mongla port between 2010 and 2017.<sup>2</sup>

1 Government of the Peoples Republic of Bangladesh, Ministry of Environment, Forest and Climate Change, The Sundarbans (Bangladesh) (N 798) Progress Report On the Decisions of 43 COM.7.B3 of the World Heritage Committee on The Sundarbans World Heritage Sites (January 2020), (GoB SOCR 2020) pages 2 and 31, <https://whc.unesco.org/document/180603>

2 A. H. Chowdhury, Study report on the impacts of industrialization and infra-structural developments on the fauna, flora and ecosystems of the Sundarbans and the surrounding areas (2018), at Tables 3 & 4

NCSS has long argued that “the OUV of the property” does not simply mean the flora and fauna located *inside* the World Heritage boundaries of the wildlife sanctuaries. The wildlife sanctuaries alone are insufficient to provide the necessary ecological and hydrologic resilience for viable populations of endangered species and biological diversity, given rising seas and other threats. The entire remaining Sundarbans ecosystem – essentially the Sundarbans Reserve Forest and its 10 km buffer zone – must be managed for maximum conservation of the Sundarbans’ OUV, particularly the endangered dolphins, tigers, terrapins, crocodiles and their remaining habitats.

## 2. Shipping and dredging moving forward with unknown impacts on endangered species

There have been no improvements in management systems related to shipping or dredging to minimize negative impacts to the property, violating 41 COM 7B.25.8 and 43 COM 7B.3.9. 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 mangrove islands and riverbank communities.

In May 2020, fishermen’s groups and environmental experts sounded the alarm about the roughly 100 old barges full of coal ash from Indian power plants traveling regularly through the Bangladesh Sundarbans for use in cement production. These barges leak fuel oil and capsize regularly, most recently in April 2020, threatening the already precarious hilsa fishery (*Tenualosa ilisha*)<sup>3</sup> Hilsa makes up 12% of the fish catch of Bangladesh<sup>4</sup>, and is one of the most important species of the Sundarbans and Bay of Bengal.<sup>5</sup>

There has been no credible environmental assessment for dredging of the Passur River that includes an assessment of impacts on the Outstanding Universal Values (OUV) of the Sundarbans, violating 41 COM 7B.25.9 and 43 COM 7B.3.4. 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.<sup>6</sup>

Capital dredging began in the Passur River and adjacent to the World Heritage site in early 2018, and continues today. Capital dredging is also extensive at Payra. The Government of

Bangladesh’s 2020 report to UNESCO reveals that 7.5 million square meters of river bottom of the Passur River are set to be dredged, eliminating many of the only shallow areas away from ship traffic where dolphins hunt. The dredging will take place along nearly the entire Passur River in the Sundarbans, from Harbaria all the way to Mongla port, including the Karamjal area and Dhangmari dolphin sanctuary. Dredge spoil was supposed to be dumped in the shallows of the river directly across from the Dhangmari sanctuary and nearby Banishanta Village.

Due to people’s protest in Banishanta area, the decision was changed and the dredged spoil suddenly started to be dumped in the agricultural land of the people in Joymoni area. People of Mongla have been protesting the dumping of dredge spoil from Passur River currently despite the Covid-19 pandemic situation and government lockdown. The report states that an environmental assessment that included impacts to the OUV of the Sundarbans was completed in November 2019. But that EIA has not been made public, and the likely impacts on endangered dolphins, turtles and others remains undisclosed.<sup>7</sup>

The SOCR report admits that for Ganges River Dolphin and Irrawaddy Dolphin, changes in turbidity and other factors “largely influence their movement”, and that “site characterization of these two indicator species indicates any changes in... water depth will alter their habitat suitability.” Given that large areas of the river will become deeper to make way for daily passage of large coal ships, the potential impacts to dolphins and their prey are concerning.

The Forest Department’s own dolphin management plan of 2018 found that “extensive dredging will be needed to keep the channels in the Passur River open for navigation by the coal barges and other ship traffic needed to support the Khulna/Rampal coal-fired thermal power plant. This could cause substantial changes to the morphology of river channels, potentially altering the priority habitats for freshwater dolphins and other aquatic species, including the critically endangered Batagur turtle and vulnerable small clawed otter.”<sup>8</sup> GoB studies have also warned that Royal Bengal tiger and the deer they depend upon will be increasingly stressed by increasing traffic of tankers and barges supplying the coal plant at Rampal.<sup>9</sup> The impact of shipping on Sundarbans tigers has become even clearer during the COVID shutdown: with less boat traffic, tigers in the

3 <https://www.downtoearth.org.in/news/pollution/series-of-ash-barges-sinking-raises-concerns-on-sundarbans-ecology-71042>

4 <http://www.dhakatribune.com/bangladesh/environment/2017/06/12/payra-coal-fired-power-plant-threat-ilish-sanctuaries/>

5 <https://en.prothomalo.com/bangladesh/news/174247/Power-projects-threaten-hilsa-migration-routes>; <http://en.bdfish.org/2013/03/migratory-pattern-route-abundance-hilsa-shad-tenua-ilisha/>

6 <https://drive.google.com/file/d/0B3Rnn2y2GDfbdHNqZ25QcTvMnM/view>

7 GoB SOCR 2020 (see note 1), pages 13-15.

8 [http://bforest.portal.gov.bd/sites/default/files/files/bforest.portal.gov.bd/notices/30f5b6ba\\_cc83\\_4e05\\_8a70\\_bfebf7378296/Community-based%20NRM%20Plan%20for%20Dolphins-29July2018.pdf](http://bforest.portal.gov.bd/sites/default/files/files/bforest.portal.gov.bd/notices/30f5b6ba_cc83_4e05_8a70_bfebf7378296/Community-based%20NRM%20Plan%20for%20Dolphins-29July2018.pdf)

9 <https://whc.unesco.org/en/documents/148097>, p. 23.

West Bengal Sundarbans have been spotted by rangers six to seven times more frequently.<sup>10</sup>

In May 2020, dozens of northern river terrapin hatched at Karamjal Wildlife sanctuary less than 5 km from large industrial projects underway near Mongla Port.<sup>11</sup> The habitat of these critically endangered turtles must be better assessed and protected from pollution, dredging, and shipping.

### 3. Pollution controls for new coal fired power plants are insufficient

The SOCR report claims that the Maitree coal fired power plant at Rampal meets the World Bank Guidelines, but it cites the guideline for power plants *smaller* than 600 MW, which Maitree is not. In fact, the Maitree plant will *not* meet the World Bank's guidelines for power plants over 600 MW in degraded airsheds — though with proper pollution controls, it would. Those controls include *fabric filters* for PM, *selective catalytic reduction* for NOx, and *activated carbon injection* for mercury. The World Bank guidelines also notes dry disposal of coal ash is critical to prevent contamination of surface and groundwater. The Maitree plant, as well as the power plants at Taltali and Payra, continue to move ahead *without* state of the art pollution controls. Cylcone Amphan illustrates that the hundreds of hectares of planned ash ponds will be under water during storm surges. Even with no storms, sea level rise will put all of the ponds under water annually by 2050.<sup>12</sup> Experts recommend that shipping of coal and coal ash on the Passur River should be avoided entirely.<sup>13</sup>

The Payra coal plant began commercial operation on May 15, 2020, despite insufficient assessment of its potential impacts on the aspects of outstanding universal value (OUV) of World Heritage, including ecological processes, endangered species or biological diversity. Independent modeling of air pollution from the coal plants at Rampal at Payra show significant mercury emissions reaching the Sundarbans and Bay of Bengal, potentially contaminating the food chain.<sup>14</sup>

The SEA prospectus of February 2020 indicates the SEA will *not* address pollution mitigation measures needed at the power plants, as requested by the Committee Decisions 41COM

7B.25.10 and 43 COM 7B.3.9.<sup>15</sup> NCSS remains extremely concerned by the cumulative impacts of the proposed coal plants at Rampal, Kalapara, and Taltali, as well as nearly 18 GW of coal plants at Cox's Bazar that could further impact the ecology of the Bay of Bengal and Sundarbans.<sup>16</sup> The coal plants are a tragic mistake for the Sundarbans, especially in light of ground breaking new studies showing that Bangladesh could more affordably provide for national and local energy needs exclusively through clean solar facilities that do not harm food production, water, or biological diversity.<sup>17</sup>

### We call on the World Heritage Committee to recommend at its 44<sup>th</sup> session:

1. Add the Sundarbans of Bangladesh to the List of World Heritage in Danger.
2. Urge a strict halt to construction of highly polluting, carbon intensive industries near the Sundarbans, including the coal plants at Rampal, Taltali, and Payra, the LPG bottling plants, the Mongla Power Pac Economic Zone, and dredging in the Passur River.
3. Call on India, China and other relevant countries to explain their involvements in the coal plants at Rampal, Taltali, Payra, and Cox's Bazar, 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.
4. Call upon financiers not to support any large-scale industrial projects that will harm the Sundarbans.

10 [https://www.tbsnews.net/panorama/bengal-tigers-roam-free-tour-ist-free-sundarbans-82585?fbclid=IwAR34Ju138z2qutHz\\_DyJ4rxs-w9G-6Wn4ODMvOqMhUH0yckHEfRoJEiofsbM](https://www.tbsnews.net/panorama/bengal-tigers-roam-free-tour-ist-free-sundarbans-82585?fbclid=IwAR34Ju138z2qutHz_DyJ4rxs-w9G-6Wn4ODMvOqMhUH0yckHEfRoJEiofsbM); <https://www.outlookindia.com/newscroll/big-cat-count-rises-to-96-in-west-bengals-sundarbans/1825842>; <https://www.livemint.com/news/india/indian-tigers-find-lock-down-great-in-the-sundarbans-11588963414138.html>

11 <https://www.thedailystar.net/environment/news/eggs-critically-endangered-turtle-hatches-sundarbans-1902271>

12 <https://www.nature.com/articles/s41467-019-12808-z>.

13 <https://drive.google.com/file/d/0B3Rnn2y2GDfbdHNqZ25QcTVnMnM/view>

14 [https://energyandcleanair.org/publications/air-quality-health-and-toxics-impacts-of-the-proposed-coal-power-cluster-in-payra-bangladesh/?fbclid=IwAR1Jo8FYKM5yJl16f6yRtltWJ-4TQINJUtrBXbWozr8LIR\\_HWzi\\_DTYwOGU](https://energyandcleanair.org/publications/air-quality-health-and-toxics-impacts-of-the-proposed-coal-power-cluster-in-payra-bangladesh/?fbclid=IwAR1Jo8FYKM5yJl16f6yRtltWJ-4TQINJUtrBXbWozr8LIR_HWzi_DTYwOGU)

15 [https://bforest.portal.gov.bd/sites/default/files/files/bforest.portal.gov.bd/page/c5450f84\\_c5d6\\_4cfc\\_913a\\_bd68662b19fe/2020-03-01-13-38-6bd-ba4f12c9b24e16a21c90a7b41fee3.pdf](https://bforest.portal.gov.bd/sites/default/files/files/bforest.portal.gov.bd/page/c5450f84_c5d6_4cfc_913a_bd68662b19fe/2020-03-01-13-38-6bd-ba4f12c9b24e16a21c90a7b41fee3.pdf)

16 <http://waterkeepersbangladesh.org/report-of-a-fact-finding-mission-on-possible-risks-of-having-coal-based-power-plants-in-coxs-bazar/>

17 <https://www.sciencedirect.com/science/article/pii/S0306261918316921>



# The Australian Climate Crisis and the Great Barrier Reef World Heritage Area

Earthjustice and Environmental Justice Australia



EARTHJUSTICE



Environmental  
Justice Australia



Fig. 1: Coral bleaching on Lizard Island, Great Barrier Reef, in 2015.

Photo: The Ocean Agency

As custodian of the Great Barrier Reef World Heritage Area, Australia has an obligation under the World Heritage Convention to address threats to the Reef and its Outstanding Universal Value (OUV). However, Australia is violating this obligation by failing to address the most significant threat to the Reef and its OUV – climate change. Climate change has already led to events which have harmed the Reef’s OUV, including unprecedented coral bleaching and mortality in 2016, 2017, and 2020.

Unfortunately, the impacts of climate change on the Reef led the International Union for Conservation of Nature (IUCN) to assess the Reef’s outlook as “critical” in 2020. This means the Reef is now in worse condition than when the World Heritage Committee last considered inscribing it in the List of World Heritage in Danger in 2014.

But it is not too late to protect the Great Barrier Reef. The scientific evidence is clear that the Reef’s OUV can be maintained if global temperature rise is limited to well-below 1.5°C above pre-industrial levels.

Despite this, instead of aligning its actions with an emissions pathway that is consistent with its fair share<sup>1</sup> of limiting global temperature rise to well-below 1.5°C, Australia is actively fueling the climate change that is harming the Reef’s OUV:

- Australia has not increased its ambition under the Paris Agreement, submitting the same 2030 target in December 2020 as it did in 2016.
- Australia is not on track to meet its 2030 target under the Paris Agreement; does not project a significant decline in emissions to 2030; and lacks any major policies to ensure sufficient emissions reductions to meet its 2030 target.
- Australia’s 2030 target fails to reflect its fair share of responsibility for limiting temperature rise to 2°C, let alone 1.5°C.

<sup>1</sup> A state party’s “fair share” of responsibility for limiting global temperature rise to a particular level is a recognition of both its contributions to climate change and its resources and capacity to address the threat. See section 3 of this report.

- Australia is among the world's largest exporters of coal and liquefied natural gas and is determined to expand these exports. As recently as February 2021, a coal mine located just 10 kms from the World Heritage Area was permitted to move to the next stage of assessment despite its contributions to climate change and its likely impacts on Reef water quality.

Australia's actions are also in direct conflict with advice from the IUCN and World Heritage Centre that the framework for managing the Reef – the "Reef 2050 Plan" – include concrete and consistent measures to address the threat of climate change.

Of course, no single country can solve the climate crisis, but this does not absolve Australia of its obligation under the World Heritage Convention as custodian of the Reef. The World Heritage Committee should also call on all state parties to align their actions with an emissions pathway consistent with limiting warming to a level that would protect the OUV of World Heritage sites across the globe.

### World Heritage Committee, Centre, and Advisory Bodies must address mitigation

With the world on track for over 3°C of warming by 2100, there is a very real risk that World Heritage properties will be lost if the Committee continues to defer to the United Nations Framework Convention on Climate Change (UNFCCC) processes and focus only on adaptation and site-level mitigation. According to Article 4 of the WH Convention, State parties must address the threat of climate change by doing **all they can to the utmost of their resources**<sup>2</sup>, which requires them to align their actions with a global pathway that is consistent with limiting warming to the level at which the OUV is most likely to be sustained and to undertake their fair share of global emissions reductions necessary to achieve that goal. State parties must also refrain from taking actions that place them on a pathway that is inconsistent with limiting warming to the level necessary to protect properties in other states. For the most climate-vulnerable sites, such as tropical coral reefs and glaciers, the limit of warming at which OUV, or key attributes that contribute to OUV, can be sustained is well-below 1.5°C.

### Recommendations

We recommend that the World Heritage Centre and Advisory Bodies use their unique position to protect the OUV of World Heritage properties from the threat of climate change. They should do this by ensuring that State of Conservation Reports and Draft Decisions, as well as the revisions to the 2007 Climate Policy, reflect the obligations imposed by the Convention upon

state parties, and by making recommendations about the actions that each state party should be taking to align itself with a global pathway consistent with protecting World Heritage properties.

The World Heritage Committee can rectify Australia's failures. At its meeting in 2021, we recommend that the Committee:

1. Express deep concern about the very poor and deteriorating outlook for the Great Barrier Reef and the immediate and long-term threat that climate change poses to the health and survival of the Great Barrier Reef and its OUV.
2. Note that scientific evidence demonstrates that average global temperature increase must be limited to well-below 1.5°C above preindustrial levels to protect the Reef's OUV.
3. Require Australia to revise the Reef 2050 Long-Term Sustainability Plan to include:
  - f) Concrete and consistent measures to align its actions with a well-below 1.5°C pathway, including steps to decarbonize its economy; promote renewable energy sources; phase out domestic reliance on, and production and export of, fossil fuels; and intensify efforts to meet and strengthen its 2030 emissions reduction target.
  - g) Details of national policies and investments with implementation timelines to deliver the above actions.
  - h) Identification of the specific impacts of climate change on the Great Barrier Reef and its OUV, and the actions that Australia will take to address each of these impacts.
4. Request Australia to implement the new commitments in the Reef 2050 Long-Term Sustainability Plan through legislation.
5. Request Australia to invite a monitoring mission as soon as possible to review Australia's response to the climate crisis that is threatening the Reef's OUV.
6. Inscribe the Great Barrier Reef World Heritage Area on the List of World Heritage in Danger.
7. Urge all state parties to align themselves with a well-below 1.5°C pathway to assist in protecting the OUV of the Great Barrier Reef and all tropical coral reef World Heritage properties.

<sup>2</sup> "Article 4. Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage ... situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources..."

## Annex



## The Authors

### Agent Green



The Agent Green association is a non-governmental non-profit organisation dedicated to protecting the environment founded in 2009 in Romania for the purpose of preserving biodiversity. It has an affinity for investigating environment crimes, strategically exposing them and promoting solutions

for protecting nature and ensuring the well-being of future generations. Agent Green focuses its activity on environment issues that can permanently damage biodiversity: the destruction of intact ecosystems, genetically modified organisms, climate change and poisoning the environmental factors (water, air and soil). Agent Green also approaches relevant national and international corporations with regard to the implementation of policies and standards which are superior to the existing environmental law, mobilizes locals and empowers companies to adopt a sustainable production.

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### 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 LAPSET, 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.

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### Insaf Ben Othmane

Ms. Insaf Ben Othmane, a Tunisian architect, urban development strategist, is the founder of Œcumene Studio, SCS Resilience and Sharn-aqa. Her main research interests revolve around (i) Architecture in Development, (ii) Urban Resilience projects, Sustainability and (iii) the empowerment of communities through holistic integrated projects and strategies. Working for over ten years internationally in the area of community development, urban governance and strategic planning, urban technologies in Egypt and Tunisia led her to initiate several projects as 'Urban Catalyst' in partnership with local communities and various stakeholders, organizations and institutions in search of real and effective solutions to the recent urban challenges.

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### Toon Bijmens, Salman Khairalla



Toon Bijmens and Salman Khairalla are coordinators of the international campaign 'Save the Tigris' ([www.savethetigris.org](http://www.savethetigris.org)), which is a network of over 15 civil society organisations from Iraq, Iran, Turkey, Syria and other countries with the aim to advocate for the preservation of heritage in the Tigris-Euphrates basin. Particularly, Save the Tigris has

been advocating for the protection of the natural heritage of the marshlands in Iraq through advocacy with stakeholders, research and awareness activities. Through its campaign members Un Ponte Per and Humat Dijlah, Bijmens and Khairalla are also coordinating 'Sumereen', a major UNDP-supported project to develop the natural and cultural heritage of the Ahwar through the construction of infrastructure, training and livelihood support.

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## Juanjo Carmona



Juanjo Carmona has been a lawyer and environmental consultant since 1999. In 1996, he started volunteering in Doñana through WWF Spain, so he lived through one of its blackest moments, the Aznalcólar mining catastrophe. In 2001, he was hired for WWF's Doñana office, located in Hinojos, where he lives.

Since then he has been working to conserve Doñana in close collaboration with local communities, NGOs, businessmen, farmers and administrations. When talking about Doñana and its OUV, its beaches, lagoons, marshes, forests, dunes, lynx or imperial eagles, for him it is talking about his home and people.

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## Louay Dakhel

Louay Dakhel (1958) is an architect from Aleppo and has owned a consulting engineering office there since 2000. He is a member of ICO-MOS International and has participated in several international conferences such as an International Symposium on Arab and Islamic Urban Heritage at Aleppo University in 2007, and a Technical Coordination Meeting on Old Aleppo organized by UNESCO in Beirut in 2017. From 2017–2020 he has also been a lecturer at the Faculty of Archaeology of the University of Aleppo, and since 2020 he has participated in the project of restoring the wall of the Citadel of Aleppo. Mr Dakhel is the author of books such as "The Art of Islamic Decoration" (1993) and "Aleppo" (2017).

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## Wiwik Dharmiasih



Wiwik Dharmiasih (38) is a lecturer at the Department of International Relations, Universitas Udayana, in Bali, Indonesia. 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 Unit 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 of the management of World Heritage property in Bali under the Subak Research Center, Universitas Udayana (2014). She is currently active in supporting

community participation and youth involvement in the management of Bali's Cultural Landscape. She recently facilitated a photovoices community engagement initiative in Subak Jatiluwih to elicit local perspectives on the future management of the site.

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## Sonja Dimoska

Sonja Dimoska is a native of Ohrid in the Republic of Macedonia, holds two bachelor degrees in Tourism Management and Philosophy, and has additionally completed a Master of Business Administration at National Taiwan University. She is currently working in marketing and project management. Sonja joined Ohrid SOS, a citizen initiative devoted to the protection of the UNESCO Ohrid Region, in its early days in 2015, and has been one of its key members ever since. Her engagement spans from PR activities to research and analysis of proposed plans, strategies and laws as well as SOS's strategic planning.

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## Earthjustice



**EARTHJUSTICE**

Founded in 1971, Earthjustice fights for the right of all to a healthy environment. As the largest nonprofit environmental law organization in the United States, Earthjustice uses the power of the law and the strength of partnership to protect people's health, preserve magnificent places and wildlife, advance clean energy, and combat climate change. We partner with thousands of groups and individuals to take on the critical environmental issues of our time and bring about positive change.

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## Environmental Justice Australia



**Environmental Justice Australia**

Established in 1991, Environmental Justice Australia is the environment's legal team. We use the law to protect our environment, and we work to change our laws to make sure they protect the right of all Australians to clean air, clean water and healthy ecosystems.

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## EuroNatur

EuroNatur is a charitable internationally active nature foundation founded in 1987. In its projects EuroNatur focuses on creating nature conservation across national borders, to conserve our European natural heritage in all its diversity, and to protect precious ecologically valuable traditionally cultivated landscapes in Europe. EuroNatur links ecologically precious areas by protecting wildlife corridors or creating new ones. Further key concerns are achieving powerful public presence at political levels, ecological regional development, man-with-nature perspectives, long-term projects and nature conservation as a path to human reconciliation. EuroNatur always works with partners in the project region. It has developed an international network of scientists, conservationists and experts and maintains a constant dialogue with other organisations and with the business world.

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**EURONATUR**

## Kate Fielden



Dr Kate Fielden is Honorary Secretary to the Stonehenge Alliance. As an archaeologist and Trustee of CPRE Wiltshire Branch she has been involved in planning issues at Avebury and Stonehenge for around 30 years and helped in the formation of successive Local Development Plan policies and WHS Management Plans for the WHS. She is currently

Vice Chairman of Rescue: The British Archaeological Trust, and of the Avebury (Civic) Society which she represents on the Avebury WHS Steering Committee.

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## Andy Gheorghiu

Andy Gheorghiu works as a full-time freelance campaigner, consultant, and activist for climate and environmental protection. During the last decade, he co-authored several reports about the negative climate impact of gas and fracking. Andy collaborated with grassroots groups, NGOs, scientists, attorneys and political decision makers to introduce several fracking bans and moratoria in Europe and beyond. He also contributed to the final session of the Permanent Peoples' Tribunal on Fracking, Human Rights and Climate Change. Andy currently supports and is a member of the Saving Okavango's Unique Life (SOUL) Alliance.

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## Teresa Gil



Teresa Gil is a Spanish biologist with 20 years of professional experience in Natura 2000-Protected Areas management and habitats and flora conservation. Since April 2019, she has been the Head of the WWF-Spain Freshwater Programme. WWF-Spain's origin is closely linked to Doñana. Over the last 50 years, WWF has been fighting to ensure

the preservation of its OUV, trying to stop the illegal theft of water that is degrading outstanding aquatic ecosystems like Doñana National Park and promoting marshland restoration in the Guadalquivir Estuary as a way to restore some of the losses of the past, while reducing the risk in the future, improving the biodiversity and giving a green economic alternative to intensive agriculture and tourism. Teresa is a member of several NGOs like WWF, SEO Birdlife, Territorios Vivos and SEBICOP. She is member of the IUCN WCPA (World Commission on Protected Areas) and EAGL-Spain.

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## 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.

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## Elke Greiff-Gossen

Elke Greiff Gossen was born in 1961, she studied Computer Science at the University of Dortmund. Elke operates the website LoreleyInfo, an information portal for the World Heritage Upper Middle Rhine Valley. She is a member of the "BI Rheinpassagen". This citizens' initiative promotes the preservation of the World Heritage Upper Middle Rhine Valley. Elke focuses on the fields of optimizing ferry services, noise reduction, conservation of nature and climate-friendly infrastructures. She is responsible for the online presence of the "BI Rheinpassagen".



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## Fritz Groothues

Fritz Groothues studied in France and Germany and after two years as a social researcher in Ghana he moved to the UK in 1974. He spent most of his working life in the BBC World Service, first as a producer, then as Head of Strategy Development.



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## Guadalupe Yesenia Hernández Márquez

Yesenia Hernández is a consultant, academic and activist on sustainable development issues. She specializes in advocacy on public policies, biocultural diversity and traditional knowledge projects applied to sustainability initiatives. She is a member of various international indigenous forums such as



World Heritage and recognized with various awards such as: Nacional de la Juventud 2002 in the area of Environmental Protection, awarded by the Presidency of the Mexican Republic (November 24, 2003); Young International Peace Prize in the Ecology area, awarded by the UN World Youth Assembly (December 11, 2003)

and the Outstanding Woman Recognition in the Municipality of Oaxaca de Juárez, Oaxaca, March 8, 2009. Yesenia is also the head of the environmental organization Preservamb in Oaxaca, which is a recognized UNESCO Club.

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## Niels Henrik Hooge

Niels Henrik Hooge holds a Master of Laws and a Master of Arts in Philosophy, specialising in environmental law and environmental ethics respectively. He has for several decades been active and worked in and with the Danish and European NGO community in various fields and in different capacities. In 2014, he co-founded NOAH Friends of the Earth Denmark's Uranium Group. In addition to by activities in Greenland and Denmark to help reintroduce the Greenlandic uranium-zero tolerance, the group's aim is to provide information on the nuclear fuel chain, including the environmental, energy, foreign and security policy consequences of uranium extraction, processing, transport and trade, as well as nuclear waste disposal. The group actively engages members and networks both in Greenland and Denmark.



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## International Campaign for Tibet



Founded in 1988, 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.

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## 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.



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### Ammar Kannawi

Ammar Kannawi holds a Master's degree in Classical Archeology. He has conducted archaeological research and excavated at several sites in the Province of Aleppo. Until 2014, Ammar had been the curator of the Department of Classical Archeology in the Aleppo National Museum, and in 2015, he joined the team of the Idleb Antiquities Center. Ammar has supervised technical reports on emergency intervention and assessment of the condition of archaeological sites affected by the war. Additionally, he has been working with the Safeguarding the Heritage of Syria and Iraq Project (SHOSI) in implementing preservation projects, at the Idlib Museum and a number of archaeological sites in the Idlib region. Since 2018, Ammar has been Director of Protection Projects with Syrians for Heritage (SIMAT).

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### Vadim Kirilyuk



Vadim Kirilyuk has been working in the Daursky Nature Reserve for over thirty years, including almost 15 years as deputy director and five years as director. He holds a PhD in Biology, and has combined his nature conservation activities, including effective anti-poaching and integrated development of the protected area, with scientific work. He developed and lead the restoration program for Mongolian Gazelle in Transbaikalia (2001–2021), was one of the initiators and developers of the program for studying the adaptations of the Daurian ecosystems to the impacts of climate change. He designed and helped to establish two new PAs, including Dzeren Valley National Reserve. Vadim has been a key participant of planning, expeditions and other activities of the Russian-Mongolian-Chinese Dauria Protected Area. He also served for two years as the Head of the Biodiversity Program of the Amur Branch of WWF Russia.

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### Mikhail Kreindlin

Mikhail Kreindlin (1970) is a biologist and lawyer. He participated actively in the work of the Nature Protection Squad (Druzhina) of the Faculty of Biology of the Moscow State Lomonosov University in the period from 1986–98. From 1991–2002 he worked in state structures dealing



with the management of protected areas. He works now as Protected Areas Campaign Coordinator for Greenpeace Russia and has been involved in work related to natural World Heritage properties since 2001. He has conducted various court cases connected to the protection of natural World Heritage properties.

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### Aleksandra Koroleva



Aleksandra Koroleva is co-chair of the Russian NGO Ecodefense. After declaring Ecodefense a foreign agent and initiating 5 criminal cases against her, she sought political asylum in Germany where she now lives. From 2006–2009, she served as Deputy Director of the Curonian

Spit National Park and is the author of books and articles on the Curonian Spit. Since 2018, she has been the head of the project "Monitoring of regional phenomena of global climate change in the Curonian Spit", funded by the Heinrich Boell Foundation.

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### Zoltán Kun

Zoltán Kun studied forestry, gained an MSc degree on landscape architecture, and a professional engineering level on soil sciences. He has worked in both the civil society sector and also in the for-profit sector as a nature conservation expert. He is a research fellow of the Wildland Research Institute and currently serves as Head of Conservation of the Wild Europe Initiative. Zoltán Kun is a member of the IUCN's World Commission on Protected Areas and serves in various specialist group of WCPA as well as in two IUCN Task Forces about Primary Forest and Rewilding. His main focus of expertise includes the following topics: protected area management effectiveness, old-growth forests and their importance for biodiversity and climate change, wilderness protection across Europe.

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### Martin Lenk

Martin Lenk holds a major in geography (minors in landscape ecology & Slavic studies) from the University of Greifswald (Germany). He completed semesters abroad in Russia, Kazakhstan and Spain, and was involved in preparing the WH nomination of "Saryarka – Steppe and Lakes of Northern Kazakhstan". After directing a project rehabilitating ancient qanats (kahriz) in rural Azerbaijan, he joined World Heritage Watch in Berlin. Currently Martin is a development expert at the Department



of Heritage with the Ministry of Information, Culture and Tourism of the Lao PDR. He is coordinating the nomination of the first natural WH of Laos: Hin Nam No National Park. He has a strong interest in community involvement, Heritage Impact Assessment and boundary delineation/demarcation. Martin is a member of the German Society for Nature Conservation (NABU) and World Heritage Watch.

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### Josef Lueger

Prof. Dr. Josef Lueger is a doctor of geology and paleontology. In addition, he completed postgraduate studies in business and administrative management. 1989 he founded the InGEO Institute for Engineering Geology in St. Leonhard am Forst (Lower Austria), which he still heads today. Since 1985 he has been a sworn and court-certified expert for geology, groundwater and other fields. He is author of numerous scientific papers and lecturer in theory and ethics of expert opinions at the Technical University of Vienna and Danube University Krems. As one of few European experts, he also works out expert opinions and counter-reports for citizens' initiatives and environmental organizations in environmentally relevant procedures, e.g. for the „Alliance For Nature“ (Vienna).

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### Kreshnik Merxhani



Kreshnik Merxhani (1982) graduated in architecture studies at the Polytechnic University of Tirana in Albania. Since 2008 he has focused on traditional architecture, restoration projects and artistic photography, particularly in Gjirokastra. From 2008-12 he was trained in restoration by Cultural Heritage without Borders. In 2012-14 he was the project manager of a restoration project of the Hammam (turkish bath) in Kruja, another historic city in Albania. From 2014-16, he was head of the Technical Department at the Regional Directorate of National Culture in Gjirokastra, serving as chief architect for the design of several restoration and revitalization projects. He carried out a risk assessment of all the listed monuments in the region of Gjirokastra and since 2016, he has been the group leader and architect for restoring the city's old Bazaar.

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### Franco Migliorini

Franco Migliorini is an architect with 45 years practice in urban and regional planning, and a former part-time professor at Venice University. He is the author of books and essays on spatial planning in Italy and Europe, the Italian representative in the European Council of Town Planners (ECTP), and an opinion-maker in regional papers and digital press. He is active in the implementation of EU Interreg spatial projects.

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### 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 hydropower and oil sands projects and climate change.

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### Elena Minchenok



Elena Minchenok, born in St. Petersburg (Leningrad) in 1983, graduated from the Saint Petersburg State University as a Slavist. She was a co-founder of the St. Petersburg architectural heritage preservation NGO "Living City" (2006), one of the most noticed and influential civic organizations of Russia of the 2000s.

In 2007, she joined the All-Russian Society for the Protection of Historical and Cultural Monuments (VOOPIK) and has been member of the Presidium and of the Council of the organization for number of years. In 2009, she became a member of ICOMOS, and in 2011-2012 she was editor and author of a bilingual book "Saint Petersburg: Heritage at Risk", a project that was lead in collaboration with MAPS (Moscow Architecture Preservation Society) and SAVE Britain's Heritage and involved an international team of contributing authors. Author of numerous articles on heritage preservation in the Russian press.

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### Irina Panteleeva



Irina Panteleeva, a half-time World Heritage Program Coordinator, Greenpeace Russia, is a sociologist by profession who has made a career change, and is currently engaged in the problems of specially protected natural areas and World Heritage Sites. Outside of work, Irina likes to volunteer in national parks. She is the editor-compiler and one of the authors of the book "World Natural Heritage in Russia. 25 years in review".

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### Andrey Petrov

Andrey Petrov (1958) is a geographer. He graduated from the Faculty of Geography of the Moscow State Lomonosov University and then worked there as a scientist. He was an active member of the Nature Protection Squad (Druzhina) in the period from 1977-1990 and has a PhD. He has worked as World Heritage Campaign Coordinator in Greenpeace Russia since 2005, and went into retirement in 2020. He is an expert in questions regarding protected areas, environmental tourism and the application of the World Heritage Convention. He was elected as one of the Heritage Heroes at the 39th Session of the World Heritage Committee.



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### Tomasz Pezold Knežević



Tomasz has been a conservationist for 19 years, including over 12 years international experience with IUCN and WWF in the following countries and territories: Serbia, Albania, (FYR/ North) Macedonia, Montenegro, Poland, Croatia, Bosnia and Herzegovina, Kosovo, Moldova, Ukraine, Transnistria, Turkey, Bulgaria, Romania, Greece, Belarus. Currently he is working as Biodiversity Conservation Specialist, specialising in biodiversity conservation, protected area management, transboundary conservation, UNESCO World Heritage, building systemic and institutional capacities, regional development, tourism in protected areas, natural resources management and governance. His special interests are in transboundary conservation, and UNESCO World Heritage. Tomasz is a member of the IUCN WCPA's World Heritage Network and Transboundary Conservation Specialist Group.

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### Aleksandra Pilipenko (Tevkina)



Aleksandra Pilipenko (Tevkina) graduated from Moscow State University of Geodesy and Cartography in 2018 with a Master's degree. She began to be engaged in nature conservation in the Student Nature Protection Team of MSU with which she has been working to the present. Since 2019, she has been an employee of the GIS unit of Greenpeace Russia.

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### Gerry Proctor

Gerry Proctor has an Honours in Theology and a Masters in Philosophy at Liverpool Hope University with a thesis entitled "A Commitment to Neighbourhood". He worked for eight years with young people in the town of St Helens and then spent six years living and working in Latin America in poor communities in Ecuador and Bolivia. He then returned to Liverpool, his birthplace, and worked for 12 years in charge of one of the largest Roman Catholic communities in the city. In the past decade he has lived in the apartment complexes of the city centre and waterfront working with residents and founding Engage Liverpool which works to improve people's quality of life and raise the profile of urban issues to improve the sustainability of city living. He sits on the Liverpool World Heritage Site Steering Group.



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### Protection and Preservation of Natural Environment in Albania

Protection and Preservation of Natural Environment in Albania (PPNEA) is a non-governmental environmental organisation that operates nationwide, known as Albania's first environmental organisation. It was established in 1991 by a special decree of the Albanian Academy of Sciences. PPNEA participates in and organizes many environmental awareness-raising campaigns and undertakes a vast array of different projects. The organisation has a vast experience in nature and biodiversity conservation, environmental education focusing on sustainable livelihood, and interdisciplinary natural resources management. PPNEA's mission is to secure a societal and governing atmosphere where nature conservation is a priority through rigorous scientific research, community engagement, strategic partnerships and continuous interaction with decision-makers.



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## 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.

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## Paul Reed

Paul Reed has been a Preservation Archaeologist with Tucson, Arizona – based Archaeology Southwest since 2001. He lives in Taos, New Mexico and also serves as Chaco Scholar at Salmon Ruins Museum, New Mexico. Over the last several years, Reed has been working to protect the Greater Chaco Landscape from expanded oil-gas development associated with fracking in the Mancos Shale formation. Through a series of meetings and forums with public officials, tribal leaders, various US Government agencies, New Mexico state officials, and New Mexico's Congressional delegation, Archaeology Southwest and its partners (with Reed as lead) have focused on expanding protections to sites, traditional cultural places, and fragile landscapes in the greater San Juan Basin. Reed is also a member of the Society for American Archaeology's Mancos Shale Formation-Chaco Task Force.

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## Dawn Adrienne Saliba



Dawn Adrienne Saliba, Ph.D. is the President of the collective MALTA-ARCH, which since 2017 has been advocating for the preservation of archaeological sites on Malta. (It is currently in the process of gaining NGO Status.) She is also an interdisciplinary researcher pursuing postgraduate studies in Archaeology with the Uni-

versity of Malta. Her current project investigates theatrical representation and performative liminality in the Late Neolithic underground temple and burial site, the Hal Saflieni Hypogeum.

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## Daniel Scarry



Daniel Scarry became engaged with Ohrid SOS, a local citizen initiative in the Republic of Macedonia, in 2015 after proposals were announced to drain the vital Studenchishte Marsh wetland and impose large-scale tourism infrastructure upon the Ohrid Region WHS. 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.

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## Christian Schuhböck

Dr. 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.

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## Chemi Shiff



Chemi Shiff has worked in Emek Shaveh since 2015 as a researcher. He is responsible for the preliminary research that serves as the basis of the organization's activities. He has also published several reports regarding different issues concerning the need to safeguard the multi-faceted heritage of Jerusalem and all of the region as a corner stone for

any peaceful solution of the Israeli-Palestinian conflict. Chemi earned his PhD at the Department of Geography in Tel Aviv University under the supervision of Prof. Tovi Fenster and Prof.

Raphi Greenberg. In his research he examined how archaeology is utilized for the negotiation between contested identity groups in Israeli society. Additionally, in the past he has been employed as an archaeologist in the Israel Antiquities Authority.  
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### Jorg Sicot



Jorg Sicot, Dipl.-Ing., age 52, is an architect and environmental activist. Born in Germany and having lived in South Africa, Germany and France, he is now working and living in Malta since 2005. For ten years he has been a committee member with Flimkien għal Ambjent Aħjar, and is currently its chairperson. He is an avid photogra-

pher with a special interest in architecture and built urban environment. Further interests and hobbies include gardening, painting, drawing, reading, cinematography and social justice. He is fluent in German, English and Afrikaans, with basic knowledge of Dutch, Maltese, French and Sanskrit. Currently he is self-employed as an Interior Architect.

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### Eugene Simonov



Eugene Simonov is an environmental activist and expert. 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 im-

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.

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### SOSOrinoco



The purpose of SOSOrinoco is to shed light on the existing body of work regarding the situation in the Amazonia and Orinoquia regions of Venezuela, to raise awareness of the tragedy that is occurring and to outline some urgent measures that need to be taken in order to halt the unfolding human and environmental disaster. SOSOrinoco is an advocacy group started in 2018 by a group of experts inside and outside of Venezuela. They have been working anonymously, concealing the names of team members and witnesses, due to the high risk of doing this type of research in Venezuela. Their commitment has been to document and create an in-depth diagnostic of the region south of the Orinoco River and to raise awareness about the tragedy that is occurring, as well as to outline urgent measures that need to be taken in order to halt this disaster.

*Contact: info@SOSOrinoco.org*

### Sunspirit for Justice and Peace



Sunspirit for Justice and Peace is a civil society organization working in the area of social justice and peace in Indonesia. Working closely with communities and other civic actors at local and national level, their mandate is to encourage social transformation through civic driven initiatives. They combine various strategies of research, development of models or experiments, advocacy and networks in solving problems towards greater justice and peace in our society.

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### Tasos Tanoulas

Dr. Tasos Tanoulas is an architect who worked in the Greek Ministry of Culture from 1976-2016, at the Service for the Preservation of the Acropolis Monuments (1977-2010), and in charge of the Propylaia Restoration Project (1984-2010). After retirement, he was superintendent of the Restoration of the Propylaia South Wing (2013-2016). A member of Greek and international scientific institutions and committees, he published more than seventy articles in scholarly periodicals and volumes, on architectural history and theory from antiquity to date. Books: Study for the Restoration of the Propylaia, vol. I (1994) and vol. II (2002); The Propylaea of the Athenian Acropolis During the Middle Ages (267-1458), published in 1997. He received the Europa Nostra Award for Conservation and the Europa Nostra Public Choice Award in 2013, as the leader of the Propylaia Restoration Project. In 2020, he founded the initiative Acropolis SOS.

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### Ibrahim Tchan



Ibrahim Tchan is a Beninese lawyer specializing in cultural heritage. He is the director and co-founder of the Tata Somba Ecomuseum, West Africa's premier ecological museum. Nominated for the 2020 edition of the World Monuments Watch with Koutammakou, the land of the Batammariba, he coordinates the Koutammakou Benin and Togo Cultural

Landscape Preservation Project with his organization Corps des Volontaires Beninenses on this UNESCO world heritage site, with the financial support of the World Monuments Fund. Ibrahim is particularly engaged in projects involving local communities in the management and animation of world heritage. He designed the ConP'Art (Knowing my world heritage) didactic tool dedicated to the education of children (10 and 13 years old) about African world heritage through the Comic Strip character called Tory, the Little Ecocitoyen.

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### Manana Tevzadze

Manana Tevzadze holds an MA in World Heritage Studies at Brandenburg University of Technology and also holds a History and Theory of Art degree from Tbilisi State University. She has 15 years of professional experience working in cultural heritage management in Georgia, ranging from the public sector to non-governmental organizations, the private sector and academia, including international consultancies for Norway, the EC and GIZ. Manana was one of the leaders of the campaign "Save Bagrati Cathedral" in 2009, and participated actively in the protest campaign against the destruction of the Sakdrisi Ancient Gold Mine in 2014. Since 2013 she has been the chairperson of the Georgian National Committee of the Blue Shield and presently serves as the Secretary of ICOMOS Georgia.

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### Klaus Thomas

Klaus Thomas (1948) is an MBA who has retired from the Federal Ministry of the Interior and is now the spokesperson for the "Bürgerinitiative Rheinpassagen" (Rhine Transit Routes Citizens' Initiative) which works for the conservation of the landscape and culture of the Middle Rhine. This includes various activities to fight against noise



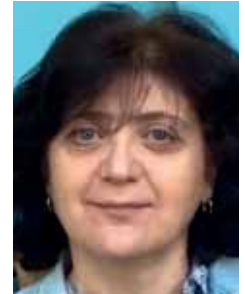
harassment from rail and road traffic in order to transmit this unique landscape unscathed to future generations.

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### Nato Tsintsabadze

Nato Tsintsabadze is a conservation architect. She graduated from Tbilisi State Academy of Arts in 1987 and obtained her MA degree in Post-War Recovery Studies (1997-1998) at the University of York (UK). She is one of the founders of the National Trust of Georgia and sits on its Board. She became a member of ICOMOS in 1993 and served as Secretary General and Coordinator of International Projects of ICOMOS Georgia since 1999. She is also an author and co-author of several publications including Towards the Future, National Policy of Cultural Heritage Sector of Georgia (2014) and Introducing Young People to the Protection of Heritage Sites and Historic Cities - An Introduction Course for Schoolchildren. She was elected President of ICOMOS Georgia in February 2019.

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### Astrid Vella

Following studies in Baroque architecture at the University of Malta, Astrid Vella founded FlimkiengħalAmbjentAħjar (FAA), a volunteer organization working to protect Malta's heritage and environment while ensuring a better quality of life. Since 2006, FAA has saved many heritage buildings and gardens from encroachment or outright demolition, including Ta' Haġrat UNESCO World Heritage Temples, the Sliema heritage houses, Villa Bologna - Attard, Villino Giannin and Villa Mekrech at Għaxaq,



as well as protecting St John's Co-Cathedral and its surrounding underground passages from damage through the construction of an underground museum. FAA is currently campaigning for heritage preservation, social and environmental justice at Manoel Island and Villa Buleben in Zebbuġ, the preservation of the Ġgantija Temples UNESCO World Heritage Site, and the reform of abusive planning and building regulations.

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## WALHI



Wahana Lingkungan Hidup Indonesia (Indonesian Forum for the Environment) was founded in 1980 and joined Friends of the Earth Indonesia in 1989. WALHI is the largest and oldest environmental advocacy NGO in Indonesia. WALHI unites more than 479 NGOs and 156 individuals throughout Indonesia's vast archipelago, with independent offices and grassroots constituencies located in 27 of the nation's 31 provinces. Its newsletter is published in both English and the native language. WALHI works on a wide range of issues, including agrarian conflict over access to natural resources, indigenous rights and peasants, coastal and marine, and deforestation. WALHI also has several cross cutting issues such as climate change, women and disaster risk management.

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## Günter Wippel

Günter Wippel holds a degree in economics and has worked on issues such as uranium mining and human rights since the 1980s. He was a co-organizer of the The World Uranium Hearing in Austria (1992) and has attended many conferences on the issue of uranium mining. In 2003, he co-founded a human-rights group, MENSCHEN-RECHTE 3000 e.V., connecting human rights violations and environmental destruction. This NGO has also worked for many years on the rights of indigenous peoples. In 2008, he initiated the working group "uranium-network.org" and co-organized international conferences on the impacts of uranium mining in Bamako / Mali (2012), in Tanzania (2013) and in Johannesburg / South Africa (2015). The NGO works with communities affected or threatened by uranium mining worldwide, focusing most recently on countries in Africa.

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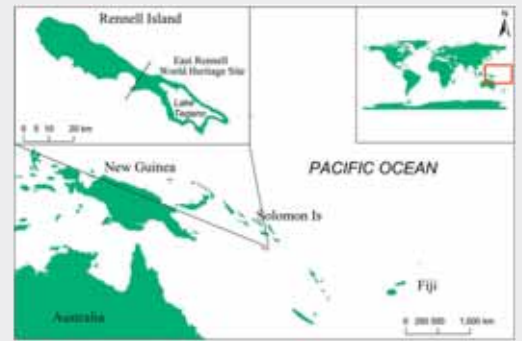
## WOLF Forest Protection Movement



WOLF is a non-governmental organization working on the protection of Slovak natural forests. It has been active in influencing the protection of nature in Slovakia for 27 years already. So far WOLF has achieved the creation of over 1,000 hectares of non-intervention forest areas; better protection of Slovak wolves and bears by decreasing hunting; influencing people's attitude in favour of the need for wilderness protection; significant change of the national legislation concerning the subsidising of the wood burning as the renewable source of energy, and many others. The most current campaign called "Everything for nothing" is focusing on establishment of strict protection on 10% of the area of the Slovak republic. In our activities we keep in mind that „Wilderness will save the world“.

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## Donate for the People of East Rennell, Solomon Islands



## Food Shortage in a Pacific Islands World Heritage Site!

IUCN – the body advising UNESCO – has stated in its recent report:

*"The real long-term threat to the ... site is the lack of alternative income generating alternatives to commercial logging and mining ... Additional support for sustainable livelihoods should urgently be provided to communities to ensure protection and management of the site."*

Please make your  
generous donation  
earmarked "East Rennell"  
here:

<https://world-heritage-watch.org/donate/>.

When the eastern half of the island of Rennell was inscribed in the World Heritage List in 1998, the local community was in full support, hoping that their lives would change for the better through tourism and investments. Logging outside the World Heritage has led to a loss of groundwater, and sea level rise to increased salinity. It has become impossible for the community to grow *taro*, their staple food, and it has come to the point that they suffer food shortage. The islanders need fishing gear and seedlings of fruit trees in order to provide for their own food. The islanders need fishing gear and seedlings of fruit trees in order to provide for their own food.

We are in close contact with Jorge Tauika, the leader of the local community's Lake Tegano World Heritage Site Association, a registered charity which will be the recipient of our support. With your support, he can go to the capital, Honiara, in order to buy the fishing equipment and seedlings so urgently needed to keep his people healthy and the World Heritage safe.





World Heritage Watch is an independent non-governmental organization founded in 2014 and committed to the preservation of the UNESCO World Heritage worldwide. We keep watch that the World Heritage is not sacrificed to political compromises and economic interests. We support UNESCO in obtaining up-to-date, complete and accurate information about the situation of the World Heritage properties. And we help local people to protect their sites and to have a reasonable benefit from them. In UNESCO, recognition has now grown that the over 1000 World Heritage properties cannot be monitored, protected and sustainably managed without the active involvement of civil society.

World Heritage Watch (WHW) is also a worldwide civil society network of more than 180 NGOs, indigenous peoples, individuals and local communities who contribute to the safeguarding of UNESCO World Heritage sites. We claim our rightful role in the global governance system of the UNESCO World Heritage Convention, and we insist on our right to participate in the identification, interpretation, management and monitoring of World Heritage sites. We claim the right of local communities to know, understand, benefit from, maintain, enjoy and develop natural and cultural heritage, and we raise awareness in the general public about challenges the World Heritage faces from mismanagement, development pressures, climate change, overtourism and armed conflict.

### **Our goals**

World Heritage Watch has the following objectives:

- To raise awareness about the importance of UNESCO World Heritage;
- To strengthen the role of civil society in the UNESCO World Heritage Convention;
- To support UNESCO in protecting and safeguarding world heritage sites.

World Heritage Watch pursues these goals by

- building a network and forum for the exchange of information and experience of its members;
- supporting NGOs and local communities who work for their World Heritage sites;
- helping to bring updated and detailed information relevant to the preservation of the World Heritage properties to the attention of governments and UNESCO;
- informing the public about developments related to the World Heritage properties.

World Heritage Watch considers itself to be an enabling and facilitating platform providing support, coordination and communication for our global network of civil society actors who are committed to "their" World Heritage property and will notify us of dangers that threaten them. Our highest concern is the reliability of our information and the technical quality of our work.

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#### **Support World Heritage Watch**

through a generous tax-deductible donation!

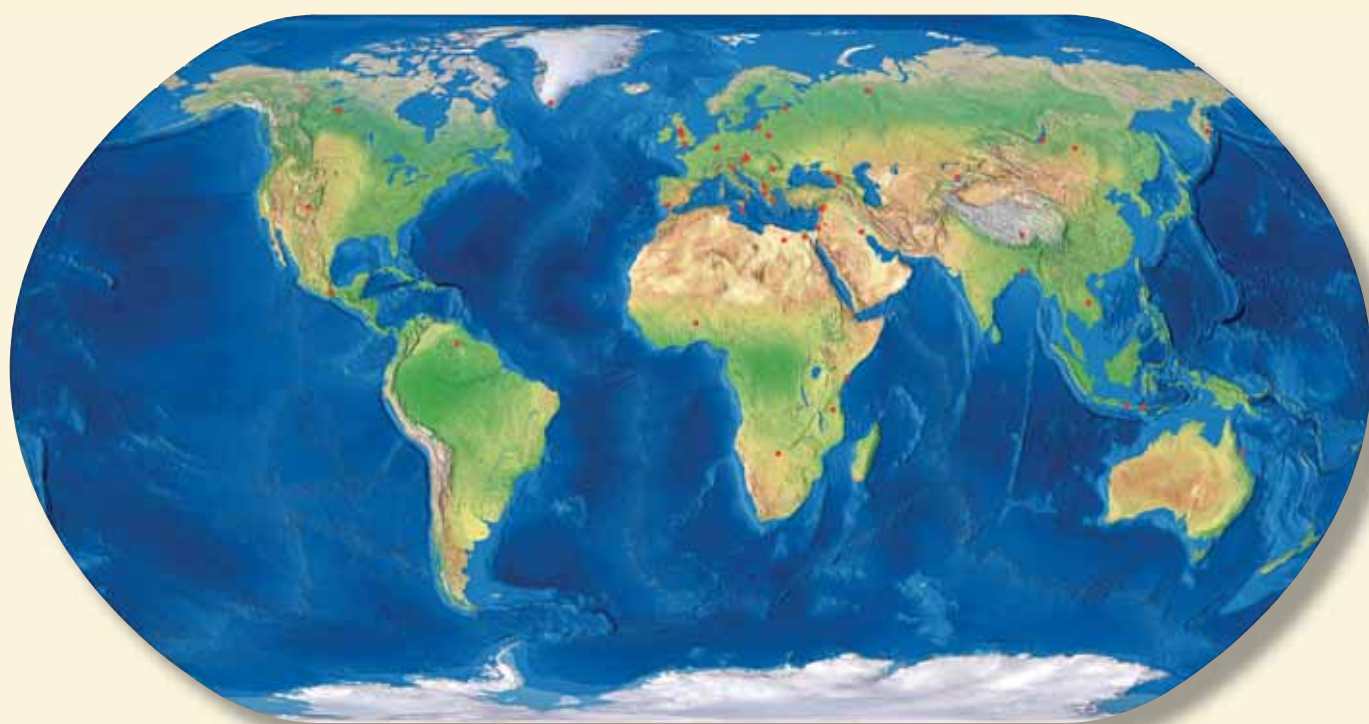
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Map of the properties covered in this volume