H.E. Mr. Tian Xuejun  
Chairperson of the extended 44th Session of World Heritage Committee

The Members of the World Heritage Committee

via email

Draft Decision 44COM 7B.109 Volcanoes of Kamchatka, in context with Draft Decision 44 COM 8B.51

Berlin, 21 July 2021

Your Excellency, Distinguished Members of the World Heritage Committee,

we are writing to you concerning the World Heritage property “Volcanoes of Kamchatka”. According to the tentative timetable of 44COM, the SOC of this property and Draft Decision 7B.109 are foreseen for discussion on 23 July, and the property is recommended for inscription on the List of World Heritage in Danger.

The IUCN and World Heritage Center have prepared reports concluding that the Outstanding Universal Value of the property is under serious threat.

More than 15,000 hectares were excluded from the Southern Kamchatka Nature Park, one of the constituent parts of the property, in order to accommodate the large-scale commercial resort “Three Volcano Park”. The territory excluded from the boundaries of the Nature Park was left without any legal protection of its natural systems. The Reactive Monitoring Mission of 2019 states that the location of the resort with all proposed facilities, including a marine terminal and roads, threatens the Outstanding Universal Value of the site. The Mission also recalled that any proposal to change the boundaries of the property to accommodate this project would have to be considered as a significant boundary modification.

However, the Russian State Party has submitted an application for only a minor boundary modification. The IUCN evaluation states that this application cannot be approved. As a result, the Draft Decision proposes to inscribe the property on the List of World Heritage in Danger, in line with Paragraph 180(b) (i) of the Operational Guidelines (modification of the legal protective status of the area).

We are convinced that Draft Decision 7B.109 fully complies with the regulatory framework and the spirit of the World Heritage Convention, and should be supported by the Committee.
According to unconfirmed information we have received, the Russian State Party will request a change in the agenda of 44COM to the effect that their request for a minor boundary modification will be discussed before the Draft Decision inscribing the property in the List of World Heritage in Danger, in a clear attempt to first have the minor boundary change accepted and subsequently the inscription in the WH List in Danger rejected by the Committee.

The Committee should not allow itself to be fooled by such procedural tricks. The situation is clear: The Russian State Party is trying to sacrifice an essential component of the property and getting away with it. Should the Committee agree to this proposal, it will not only allow a real threat to the Outstanding Universal Value of the property to happen – in direct contradiction to its mission –, but will also set a dangerous precedent by rearranging its agenda in favor of commercial interests.

Should the Russian State Party indeed request to change the order of the agenda, we call upon you not to accept this request but follow the agenda as foreseen so far, and to adopt Draft Decision 7B.109 as prepared by the WH Centre and IUCN.

With the expression of our highest consideration
Sincerely

Stephan Doempke
Chair