

World Heritage Watch Report 2020



World Heritage Watch

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Preface

UNESCO World Heritage Sites are the common heritage of humankind, for which the international community assumes a shared responsibility. Their protection and preservation should enable them, among other things, to serve as places of admiration and education for people from all over the world. The very idea of the common heritage of the world therefore implies that world heritage tourism is something desirable. Now, however, the Covid-19 pandemic has brought tourism almost to a standstill worldwide, which invites a review of developments to date.

With the growing prosperity in the global north and increasingly in the Middle East and Asia, ever cheaper air travel, improved infrastructure in developing countries, and the communication potential of the Internet, tourism had taken a tremendous boom worldwide and became the largest legal industry in the world.

Cruise ships as big as floating cities unloaded tens of thousands of tourists every day on places like Venice or Dubrovnik, and sites like the Taj Mahal, Angkor Wat and Machu Picchu were suffocating under the crowds. Elsewhere, influencers and travel bloggers explored the last “untouched” areas and “undiscovered” cultural treasures, and sent their impressions from the site all over the world, where within seconds they were picked up by tens of thousands of followers.

World Heritage sites were particularly affected - although they were not the only ones - because they are preferred tourist destinations due to their importance and attractiveness. Without special advertising, tourist numbers skyrocketed as soon as a site was inscribed in the World Heritage List. Particularly large numbers of tourists quickly collided here with the particularly strong protection required by World Heritage regulations.

It is no surprise then that tourism marketing has become an increasingly important motivation for World Heritage nominations, resulting in a danger that the inscription in the World Heritage List could inadvertently turn from an instrument of protection into a factor of threat.

The contributions to the World Heritage Watch Report 2020 are an eloquent testimony to this development. In addition to the well-known threats from mining and other harmful uses of natural resources, investor projects, mismanagement and politically motivated interventions – often at the expense of ethnic minorities, such as in Lhasa – tourism is a primary threat in one third of all sites featured in the Report. Interestingly, this affects Europe in particular, including many less well-known sites such as Lake Ohrid in North Macedonia.

Too often the local population has no significant influence on these developments: neither on the inscription of sites in the World Heritage List, the establishment of protection regimes and the restrictions that come with them - which can go as far as evictions (e.g. in Hampi) – nor on tourism development and marketing. The end result is often just big business, and the objectives of education, meeting the local population, and the experience of heritage as something held in common are lost on the way. However, these positive aspects of tourism must not be abandoned, especially at World Heritage sites.

With the World Heritage Convention, UNESCO has a unique tool at hand to influence developments at World Heritage Sites and to make them role models for sustainable tourism. The UNESCO World Heritage Committee should therefore make a valid tourism plan and technical standards for sustainable tourism development preconditional for inscription in the World Heritage List, and strictly check whether the local

population is involved in the management of the site and receives a fair share of its benefits. Their current recommendations for sustainable tourism are non-binding, and greater attention should be given to the subject in nomination, monitoring and reporting procedures.

On the basis of their commitment to the common heritage, and in recognition of the fact that World Heritage sites have a great potential as drivers of regional development, donor countries should provide development cooperation funds for those countries who cannot manage the planning and development of sustainable tourism with their own resources. Last but not least, the tourism industry itself should have an interest in the best possible visitor experience at world heritage sites.

The Covid-19 pandemic offers World Heritage sites the opportunity to make a fresh start. Everyone involved should think about what kind of tourism we want in the future, and the UNESCO World Heritage Committee should set appropriate and binding guidelines and criteria to achieve this. How can a World Heritage site benefit from its status without being loved / trampled to death by tourists? How can local populations be empowered to fill with dignity their role as custodians of the sites, and to convey the intangible heritage associated with them? The members of the WHW network, based on their their own daily experience, are in a unique position to assess the ecological, economic and cultural effects of tourism on the ground. They can play an outstanding role in the formulation of tourism policies and guidelines for World Heritage sites, and they should make use of that opportunity with determination.

Berlin, May 2020

Maritta Koch-Weser, President

Stephan Doempke, Chairman of the Board

I. Natural Properties

World Heritage-Designated Habitat for Imperiled Vaquita Porpoise 'In Danger'

Alejandro Olivera, Center for Biological Diversity

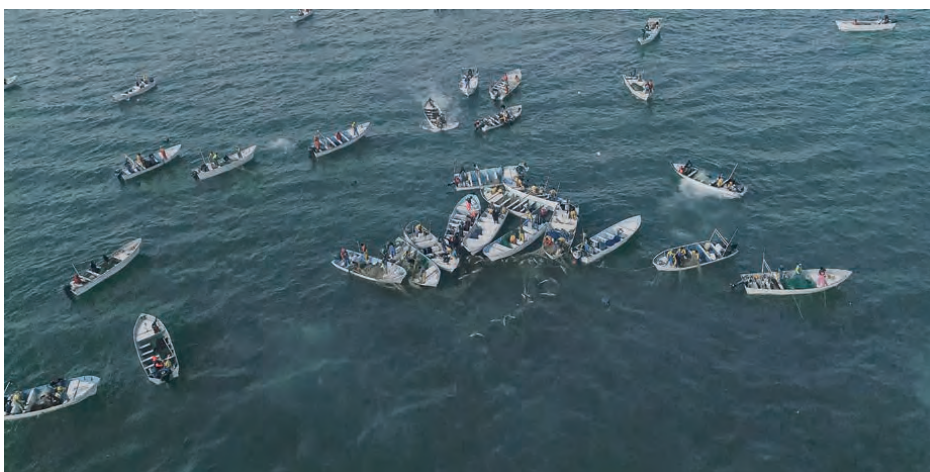


Fig. 1: Totoaba Poachers in the Vaquita refuge area.

Photo: Sea Shepherd Conservation Society

vaquita in 2014.³ In 2018, scientists reported that fewer than 19 vaquita remained with a minimum known number of six, based on sightings.⁴ In 2017, scientists estimated that 38,683 tons of totoaba inhabit the Gulf and that offtake through illegal fishing – 1,400 tons – was unsustainable.⁵

The primary threat to the vaquita's existence is bycatch, or entanglement, in gillnet fishing gear. This includes gillnets set for shrimp and finfish in the Gulf and also illegal gillnets set to catch totoaba. The

totoaba is facing a resurgent and growing demand for its swim bladder. Poachers prize totoaba for their swim bladders, which are dried and smuggled by organized crime cartels to China,

Pursuant to the World Heritage Convention, the Islands and Protected Areas of the Gulf of California site located in northwestern Mexico was inscribed on the World Heritage List in 2005 to protect the area's "extraordinary" "diversity of terrestrial and marine life."¹ The World Heritage Committee identified two endangered species in particular that were part of the property's "Outstanding Universal Value" ("OUV") – the critically endangered vaquita, which is a small porpoise endemic only to the upper Gulf of California, and the critically endangered totoaba, a large, endemic, marine fish.²

Both the vaquita and the totoaba face the same urgent and increasing threat: rampant gillnet fishing within and just outside the Gulf of California World Heritage site. The vaquita is now critically imperiled and on the edge of extinction. The population dropped precipitously from an estimated 200 in 2012 to 97



Fig. 2: Dead vaquita.

Photo source: Center for Biological Diversity

1 Convention Concerning the Protection of the World Cultural and Natural Heritage, Nov. 23, 1972, 27 U.S.T. 37, T.I.A.S. No. 8226 ("World Heritage Convention"); WHC-05/29.COM/22, Paris, 9 Sept. 2005, at 117. Of the 891 fish species present in the site, 90 are endemic. The site also contains 39 % of the world's total number of species of marine mammals and a third of the world's marine cetacean species. WHC. 2019. The Islands and Protected Areas of the Gulf of California (Mexico) inscribed on the List of World Heritage in Danger, Baku, 3 July 2019.

2 WHC-13/37.COM/8E, Paris, 17 May 2013, at 49 (Draft Statement of Outstanding Universal Value); Decision 37 COM 8E, WHC-13/37.COM/20 Paris, 5 July 2013 (adopting Draft OUV)

3 CIRVA (International Committee for the Recovery of the Vaquita). 2014. Report of the Fifth Meeting of the International Committee for the Recovery of the Vaquita. Ensenada, Baja California, México, 8-10 July 2014, Unpublished Report, 38pp., at 2

4 Jaramillo-Legorreta, A. M., Cardenas-Hinojosa, G., Nieto-Garcia, E., Rojas-Bracho, L., Thomas, L., Ver Hoef, J.M., Moore, J., Taylor, B., Barlow, J., and Tregenza, N. YEAR. Decline towards extinction of Mexico's vaquita porpoise (*Phocoena sinus*) Royal Society Open Science. <http://doi.org/10.1098/rsos.190598>

5 Centro Regional de Investigación Pesquera y Acuicultura-Guaymas. Informe Final. Evaluación De La Población De Totoaba En El Golfo De California. Responsable: Dr. Miguel Ángel Cisneros Mata. Febrero De 2018.

where they are sold on the black market for prices that can reach US\$ 46,000 per kg.⁶

World Heritage Committee Actions and Mexico's Lack of Effective Response

Under the World Heritage Convention, the Committee may list a World Heritage property as “in Danger” if it is “threatened by serious and specific dangers.”⁷ These threats may include [a] serious decline in the population of the endangered species ... of Outstanding Universal Value (OUV) for which the property was legally established to protect.”⁸

The Islands and Protected Areas of the Gulf of California World Heritage site and its OUV, including the property's vaquita and totoaba populations, are facing serious and specific dangers, as both species are threatened with extinction if gillnet fishing inside and adjacent to the World Heritage property's boundaries continues. While Mexico has consistently promised to implement new measures to protect the vaquita and reduce totoaba poaching, these measures have failed.

In 2015 the Center for Biological Diversity and the Animal Welfare Institute filed a formal request to the Committee to inscribe the Islands and Protected Areas of the Gulf of California on the List of World Heritage in Danger pursuant to its authority under Article 11 of the World Heritage Convention. This issue was first discussed by the Committee at its 40th meeting in 2016, resulting in a World Heritage Centre / IUCN reactive monitoring mission “to the property to assess its current state of conservation and to evaluate whether the property meets the conditions for inscription on the List of World Heritage in Danger.”⁹

That joint mission occurred in April 2017 and found that “illegal, unregulated and unsustainable fisheries remain a concern for the protection of the property's OUV and efforts to protect the critically endangered vaquita have not been successful” and recommended that the site be inscribed on the List of World Heritage in Danger.¹⁰ Despite this recommendation, the Committee, in response to extensive lobbying by Mexico, elected not to inscribe the site but, instead to provide Mexico time to implement new regulations and promises (including a “permanent” ban on gillnets in a large portion of the site) enacted prior to the 41st meeting.

A second mission conducted in February 2018 reiterated concerns about the status of the vaquita but recommended that the Committee defer a decision on the possible inscription of the property to its 43rd session in 2019 because “it is not possible to determine how effectively the significant efforts undertaken by the State Party to implement the 2017 recommendations have averted the risk of extinction of the vaquita.”¹¹ The Committee concurred with this recommendation.¹²

Despite multiple opportunities to demonstrate progress in implementing Committee recommendations and protecting the vaquita, Mexico's efforts have failed thereby leading to Mexico accepting an “in danger” designation at the 43rd Committee meeting in Baku, Azerbaijan.¹³ In reaching this decision, the Committee recognized that “illegal fishing has continued and even escalated in the Upper Gulf of California resulting in a threat of imminent extinction of the vaquita population.”¹⁴

As a result of the listing, Decision 43 COM 7B.26 requests that Mexico develop a set of corrective measures, a timeframe for their implementation, and a proposal for the desired state of conservation for the removal of the property from the List of World Heritage in Danger for examination by the Committee at its 44th session in 2020.

The threats to the vaquita and the need to urgently address them have been repeatedly emphasized in other international fora, including by the International Committee for the Recovery of the Vaquita,¹⁵ the International Whaling Commission¹⁶ and its Scientific Committee,¹⁷ the International Union for Nature Conservation (IUCN),¹⁸ the Convention on International Trade in Endangered Species of Wild Fauna and Flora,¹⁹ and the Society for Marine Mammalogy.²⁰

6 Report of the Eleventh meeting of the Comité Internacional para la Recuperación de la Vaquita (CIRVA)

7 World Heritage Convention, at Art. 11(4).

8 UNESCO World Heritage Committee, Operational Guidelines for the Implementation of the World Heritage Convention, WHC 13/01 (July 2013) (“WHC Operational Guidelines”), at IV(B)(180)(a).

9 Decision 40 COM 7B.75.

10 Report on the Reactive Monitoring Mission to Islands and Protected Areas of the Gulf of California (Mexico) from 09 to 15 April 2017.

11 Report on the Joint UNESCO World Heritage Centre – IUCN Reactive Monitoring Mission to Islands and Protected Areas of the Gulf of California (Mexico) from 12th to 16th February 2018.

12 Decision 42 COM 7B.86.

13 Decision 43 COM 7B.26.

14 Id.

15 Report of the Eleventh meeting of the Comité Internacional para la Recuperación de la Vaquita (CIRVA). Southwest Fisheries Science Center (SWFSC) in La Jolla, CA, USA February 19-21, 2019. <http://www.iucn-csg.org/wp-content/uploads/2019/03/CIRVA-11-Final-Report-6-March.pdf/>

16 IWC. 2018. Summary of Main Outcomes, Decisions and Required Actions from the 67th Meeting of the IWC

17 Report of the 2019 meeting of the IWC scientific committee. <https://archive.iwc.int/pages/search.php?search=%21collection73>

18 <https://iucn-csg.org/vaquita/>

19 CITES Secretary-General in Mexico to address the Vaquita and Totoaba crisis fueled by illegal international trade https://cites.org/eng/CITES_Secretary-General_in_Mexico_to_address_Vaquita_and_Totoaba_crisis_fueled_by_illegal_international_trade_31052019

20 Presidential Letter Concerning the Vaquita and Gulf of California World Heritage Site. <https://www.marinemammalscience.org/letters/vaquita-and-gulf-of-california-world-heritage-site/>

Urgent Need for Corrective Measures, Financial Support, and Implementation

Recent events demonstrate Mexico's lack of effectiveness and will to halt illegal fishing within the vaquita habitat and the urgent need for detailed, strong, and immediate corrective measures. On a single day in December 2019, Sea Shepherd Conservation Society reported sighting 70 pangas (small boats) setting and retrieving illegal gillnets near the small "zero tolerance area" (an area identified by CIRVA where the few remaining vaquita survive and where fishing must not occur) within the Vaquita Refuge.²¹ In addition, despite the Mexican government's promise to send 600 federal agents, including soldiers and national guard members, to help combat illegal activities and violence in the Upper Gulf of California region, recent media reports indicate that to date only a small number have arrived.²²

Furthermore, Mexico's Lopez Obrador administration has drastically cut the budget for agencies responsible for the conservation, management, and protection of the vaquita and its habitat, undermining needed conservation efforts. The administration's 2020 budget proposal reduces funding for SEMARNAT, the Mexican environmental ministry, by 21 percent compared

to 2018, and PROFEPA, the environmental enforcement agency, was reduced 50 percent for 2020, compared with 2018.²³

During the most recent vaquita expedition, conducted by Mexican and international scientists in late August and mid-October 2018, three pairs of vaquita were spotted.²⁴ While it is not clear if these observations represent six separate individuals, these sightings demonstrate that vaquita remain, as does Mexico's moral and legal obligation to save the species.

Despite decades of promises, the Mexican government has not effectively taken action to halt illegal fishing in the vaquita habitat. Strong corrective measures, detailing a sufficient number of enforcement personnel to the region, funding, required reporting, and timelines for demonstrating effectiveness are urgently needed, as well as another monitoring mission to ensure full implementation of the measures. The Committee's 2019 decision also opens the possibility of additional financial support to save the vaquita. Such support could be helpful particularly to increase enforcement efforts and to fund development of alternative fishing gear. It is not too late to save this porpoise that, as a consequence of anthropogenic impacts, sits on the precipice of extinction.

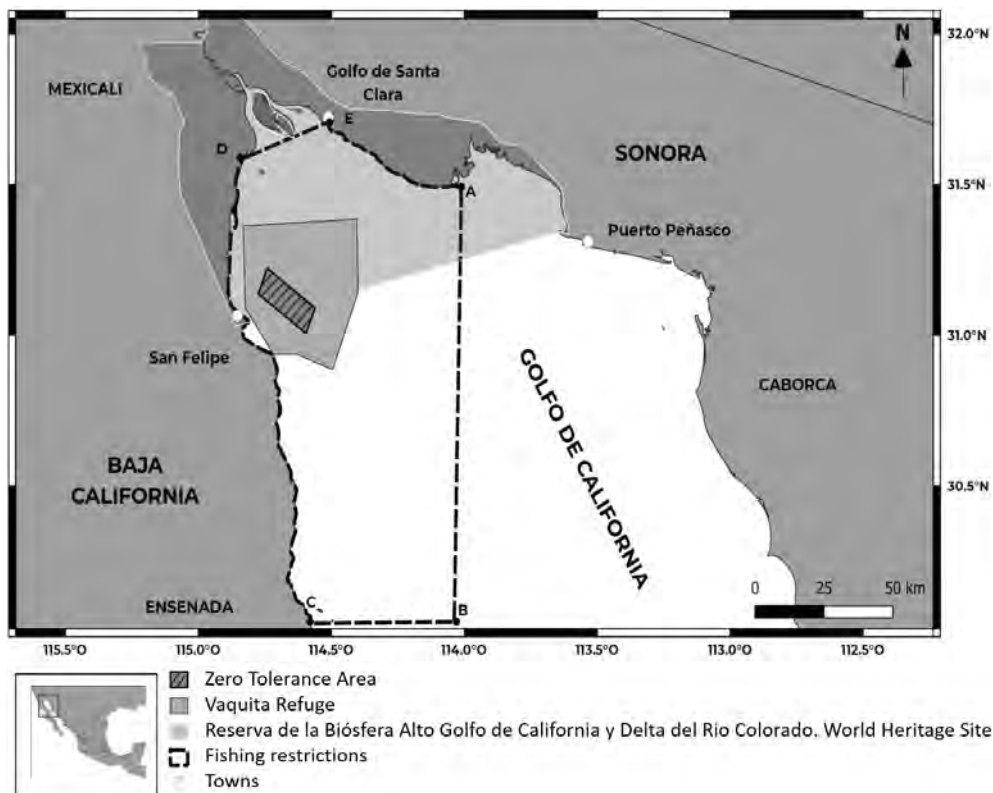


Fig. 3: The different zones of protection in the Upper Gulf of California.

Map: Center for Biological Diversity

21 Expedition Sights Endangered Vaquita Porpoise and Rampant Fishing Inside Biosphere Reserve (Oct.23, 2019): <https://seashepherd.org/2019/10/23/expedition-sights-endangered-vaquita-porpoise-and-rampant-fishing-inside-biosphere-reserve/>

22 El Gobierno promete 600 federales, llegan unos cuantos. El Universal (Nov. 19, 2019): <https://www.eluniversal.com.mx/opinion/carlos-loret-de-mola/el-gobierno-promete-600-federales-llegan-unos-cuantos>

23 2020 expenses budget project for the Mexican federation: https://www.ppef.hacienda.gob.mx/work/models/PPEF2020/paquete/egresos/Proyecto_Decreto.pdf;
Mexican federation spending budget for 2018: https://www.dof.gob.mx/nota_detalle.php?codigo=5506080&fecha=29/11/2017

24 <https://iucn-csg.org/vaquitas-with-calves-seen-in-september-2018-field-effort/>

New Developments at the Doñana World Heritage Site

Teresa Gil and Juanjo Carmona, WWF Spain

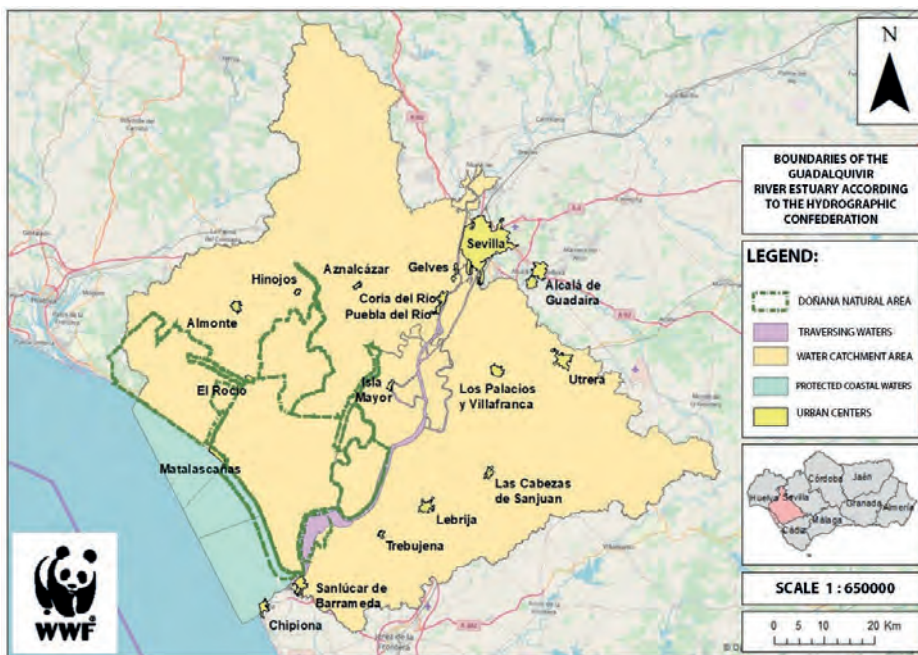


Fig. 1: Location of Doñana Protected Area (green boundary line) within the Guadalquivir Estuary as defined in the Guadalquivir River Basin Hydrological Plan.

Map: WWF Spain

ral lagoons (protected at EU level) and associated biodiversity are disappearing or degrading (see Díaz-Paniagua et al., 2019 report). Progress in the implementation of the measures proposed by UNESCO remains scarce and does not resolve the delicate situation of the site.

Uncontrolled growth of irrigated crops continues

Five years after the approval of the Special Plan of the Forest Crown of Doñana by the regional government of Andalucía, the area of illegal red fruit crops continues to grow out of control outside the property but within the river basin that feeds Doñana with freshwater. It has increased more than 13 % to reach 1,653 hectares, according to the WWF Report “Doñana under plastic: The non-stop berries invasion” (Oct 2019).

With the objective of assessing the conservation status of the Doñana Protected Area, in the southwest of Spain (Andalucía region), in January 2011 a joint mission was carried out by IUCN, the 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 World Heritage Committee has taken seven decisions and carried out a second mission in 2015 with its corresponding report on the state of Doñana. They reiterate the existence of numerous threats and pressures to the OUV of the Doñana World Heritage Site, highlighting the dredging of the Guadalquivir River, the overexploitation of the Doñana aquifer, the increase in irrigated area and the potential impacts of gas and mining projects in the area surrounding the site. It is necessary to continue monitoring the situation of Doñana as established in the decision of COM43, in Baku last year.

Most of the threats and pressures are located outside the property but have or could have an impact within it, affecting its OUV. Scientific evidence is showing this. For example, tempo-

ral lagoons (protected at EU level) and associated biodiversity are disappearing or degrading (see Díaz-Paniagua et al., 2019 report). Progress in the implementation of the measures proposed by UNESCO remains scarce and does not resolve the delicate situation of the site.

The total area of crops in areas that cannot be regulated is 1,653 hectares, which represents 20.7% of the total crops under plastics. These crops represent unfair competition for other farmers and fail to comply with the Forest Crown Special Plan, as they are located outside the area of possible regularization (irrigable agricultural soils), occupying partly dryland agricultural farms, public utility woodland, areas of special protection of natural resources and ecological corridors. WWF asks the Junta de Andalucía to act at once and implement the Special Plan, as they have assured UNESCO and the European Commission, and eliminate all crops that are not considered by the Special Plan.

Since approval in 2014 of the Special Plan, for planning land use north of the Doñana Forest Crown in Doñana, red berries crops under plastic (strawberry, blueberries, raspberries or blackberries) have claimed a greater surface area and economic weight.

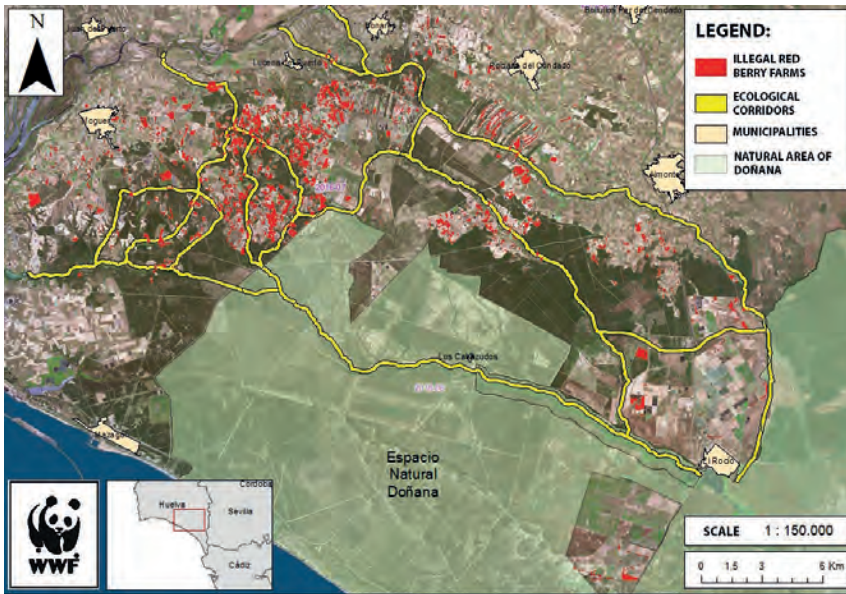


Fig. 2: Areas of illegal red fruit crops (in red), within the Special Plan of the Forest Crown of Doñana, continues to grow out of control outside the property (in green) but within the river basin that feeds Doñana with freshwater. Map: WWF Spain

During the 2015–2019 period the surface area of red berries crops within the scope of the Special Plan has increased by 552.5 hectares. This growth is having a huge impact on the quality and quantity of water available for the wetlands of Doñana Protected Area, which is on red alert.

On the other hand, the report reveals that of the total hectares outside irrigable agricultural land, almost 1,000 hectares of crops are located in public utility woodlands; 380.6 in areas of special protection of natural resources and 166.3 in areas of ecological corridors.



Fig. 3: Intensive agriculture. Red berries in the area surrounding the Doñana property. Photo: WWF Spain

The wells have continued open during several weeks, while the illegals demanded an amnesty for themselves, supported by the two parties that lead the Government of Andalusia. Finally, the GHC was able to fulfil its judicial mandate and close the wells.

Bad status of the aquifer

GHC data on the status of aquifers show that the decrease in water reserves continues unstoppable. The Spanish State has initiated a declaration that 60% of the Doñana aquifer is in bad

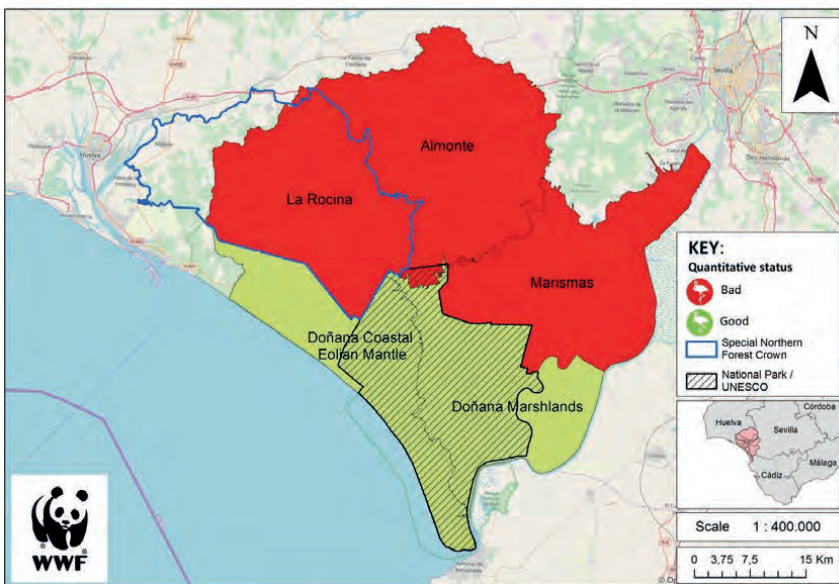
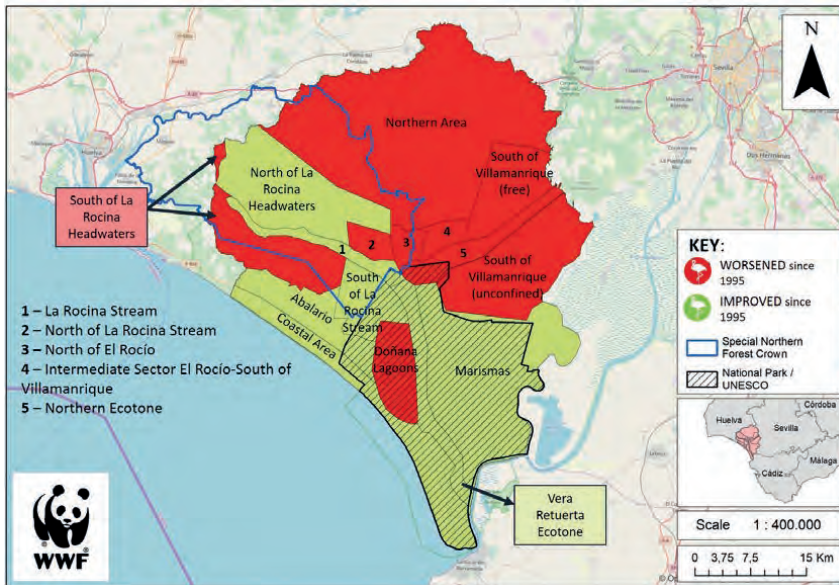
Aggressions to agents of the authority and actions to prevent the closure of wells

The lack of governance in the area of Doñana creates a sense of impunity that has become apparent between September 2018 and July 2019 in the municipality of Lucena del Puerto, one of the municipalities with the largest number of wells and illegal hectares in Doñana.

In September 2018, a guard of the Guadalquivir Hydrographic Confederation (GHC), the authority that watches over the good use of the water resource, was harassed by a group of alleged illegal farmers, while he was doing his inspection and denunciation work of illegal catchments in Doñana, to the point of requiring medical assistance. Subsequently, at the end of June 2019, the farmers of Lucena del Puerto using water illegally for irrigation again prevented the GHC from doing their duty, even though it was accompanied by National military police. The technicians of the GHC were going to close 77 illegal wells in compliance with a ruling of the Superior Court of Justice of Andalusia - maximum regional judicial body.



Fig. 4 Farmers preventing the national military authority from closing the illegal wells (summer 2019). Photo: WWF Spain



Quantitative status of aquifer waterbodies (Fig. 5) and its evolution (Fig. 6) (data source GHC).

Maps: WWF Spain



Fig. 7: There are at least 1000 illegal wells and ponds in the surrounding area. Photo: Jorge Sierra

quantitative state. This proves that their exploitation regime caused primarily by the continuous growth of strawberry and red fruit production is totally unsustainable.

The WWF Report “Doñana, an aquifer in red alert” from September 2019 analyses the “report on the status of the aquifers in the Doñana”. Its main conclusion is that the exploitation regime of the Doñana aquifer is totally unsustainable since at least half of the 90s of the last century, the reference date taken by said report and that the overall situation of the aquifer is worse than during the great drought of the mid-1990s. Extraction for irrigated agriculture has been reducing water reserves and has not allowed them to recover, even in years of heavy rains, which has caused the aquifer to have passed from 9 stable sectors and 7 in poor condition (pre-alert, alert, alarm) in 1994, to only 5 stable sectors and 11 in poor condition currently.

These data are so overwhelmingly negative that the GHC has been forced to take the most extreme measure that exists in our legislation: to declare three of the five groundwater bodies of the aquifer as “at risk of not achieving good quantitative status” due to its very bad condition – “El Rocio”, “Almonte” and “Marismas”.

This statement highlights the inaction of the Administration that, despite repeated complaints and scientific evidence, have protected this extremely serious situation without acting forcefully and effectively, allowing crops to invade the territory and wells proliferate until reach the current limit situation where much more water is extracted than is recharged.

In addition to this Declaration, effective measures must be taken urgently. WWF demands that precautionary measures should be taken against new wells and illegal crops that are detected. This will prevent the problem from aggravating, and while they are permanently closed they cannot be exploited with consequential damage to the aquifer.

Without neglecting the two sectors that are still in good status, urgent and more forceful measures must be taken in the immediate surroundings of the protected area and its river basin in order to recover the aquifer in those affected sectors. This would have a fast and important impact on Doñana. In addition, the well-known local problems of the “coastal zone” and “Doñana lagoons” sectors must be solved.

Demands

WWF demands the urgent implementation of the following measures:

- **To Junta de Andalucía** (Regional government)
 1. **Do not modify at all the Special Management Plan of Doñana Forest Crown** as claimed by illegal agribusinesses with the public support of political parties.
 2. **Close illegal farms (irrigated agricultural area not included as irrigable agricultural land).** As an urgent measure, WWF urges to the Agriculture regional government the immediate cessation of the current illegal water extraction, the elimination of illegal farms and the cessation of the use of infrastructure without permission (intakes from streams, ponds, etc.), initiating the corresponding disciplinary or criminal proceedings, as appropriate.
- **To Guadalquivir Hydrographic Confederation – GHC** (National government. River basin authority)
 3. **Urgently implement the measures provided for in the Water Law for the Groundwater Bodies (GWBs) at risk of not achieving good qualitative status.**
 4. **Adopt precautionary measures to prevent new illegal extraction from the aquifer.**
 5. **Comply with the commitment to approve and implement an annual aquifer extraction plan** which, based on the updated information, adjusts both the public and private allocations to the actual availability of water and limits the use of water so that the regime of water supplies required by the ecosystems is complied with. (Here also IGME (National research institution) plays a key role).
- **To both Junta de Andalucía and GHC**
 6. **Implement urgently the measures included in the Special Management Plan for irrigated areas located north of the Doñana Forest Crown urgently and in a coordinated way.**
 7. **Develop a Special Land Use Plan outside the scope of the Crown Plan.**
 8. **Before carrying out a transfer which in WWF's opinion will involve a waste of public money, will perpetuate the problem of unsustainable water use in the Doñana area, and which may lead to a "pull effect", it is necessary to comply with the provisions of the legislation:** control water use, review water rights, improve remote sensing techniques, implement savings measures and, of course, eliminate illegal farms and wells.

Basically illegal farmers is the interested group in continuing with an unsustainable use of water. Legal ones do not end up detaching themselves from illegal, either because of friendship and family relationships, because some are betting on two horses or because of a misunderstood corporatism that makes them not seeing the illegals as unfair competition. They have had political support from all the political spectrum for years. Since the **Special Plan of the Forest Crown of Doñana** was approved, the support is mostly local. At regional level they have lost some support from the PSOE (socialist party) and have won it among the right parties that now govern Andalucía region.

We must highlight the work of Seprona (Environmental Protection Service) and the prosecutor's service, and in recent times the work of the GHC and river patrols. Some behaviour change of certain administrations and politicians is because they have started to feel the pinch thanks to the pressure of European markets and European justice that are reacting to WWF actions and pressure. The reality has been pushing decision makers from the most radical denial, to denial with measures - nothing happens, but the administration have declared three parts of the aquifer overexploited.

Dredging of the Guadalquivir

On July 8, 2019, the Spanish Supreme Court published its Judgment by which the appeal filed by WWF Spain against the inclusion of the project of Guadalquivir River dredging in the Hydrological Plan of this river was accepted, for its serious environmental impact on Doñana.

The dredging project has been included by the Government of Spain in the last two hydrological plans of the Guadalquivir (2009–2015 and 2016–2021), and on both occasions, WWF Spain has managed to get the Spanish Supreme Court to rule against said project (STS 02/26/2015 and STS 07/08/2019).

The resolutions and reports of UNESCO have been of great help to obtain this judicial victory in defence of the natural values of Doñana, as can be read in the Judgment of 08/07/2019 in the Fourth Law Foundation, when the Court considers that the current dredging project is cancelled. In the opinion of WWF for greater legal certainty, in compliance with this Judgment, the State should carry out two actions:

- a) That the Government expressly and formally declare, by means of a legally valid administrative act, the current dredging project to be definitively and legally cancelled. This would also comply with the Government demonstration of will before UNESCO.
- b) That the project is not included in the new Hydrological Plan of the Guadalquivir river basin that is being developed at the moment by GHC and whose procedure of public participation will probably will be reactivated throughout 2020.
- c) Additionally, the Spanish State should commit to reduce the negative impacts that the maintenance dredging of the current Guadalquivir navigation channel has on the Doñana Protected Area and its associated ecosystems, as recommended by the Scientific Commission that have analysed the state of Guadalquivir river in 2010.

Reference

Carmen Díaz-Paniagua, Laura Serrano Martín, Pablo García Murillo, Margarita Florencio Díaz, Rocío Fernández Zamudio, Patricia Siljestrom Ribed 2019. Informe sobre la Repercusión de las extracciones de aguas subterráneas en el sistema de lagunas del manto eólico de Doñana. WWF Internal report for EU Commission.

The World's Worst Business Case in World Heritage Site Wadden Sea

Frank Petersen, Waddenseevereniging

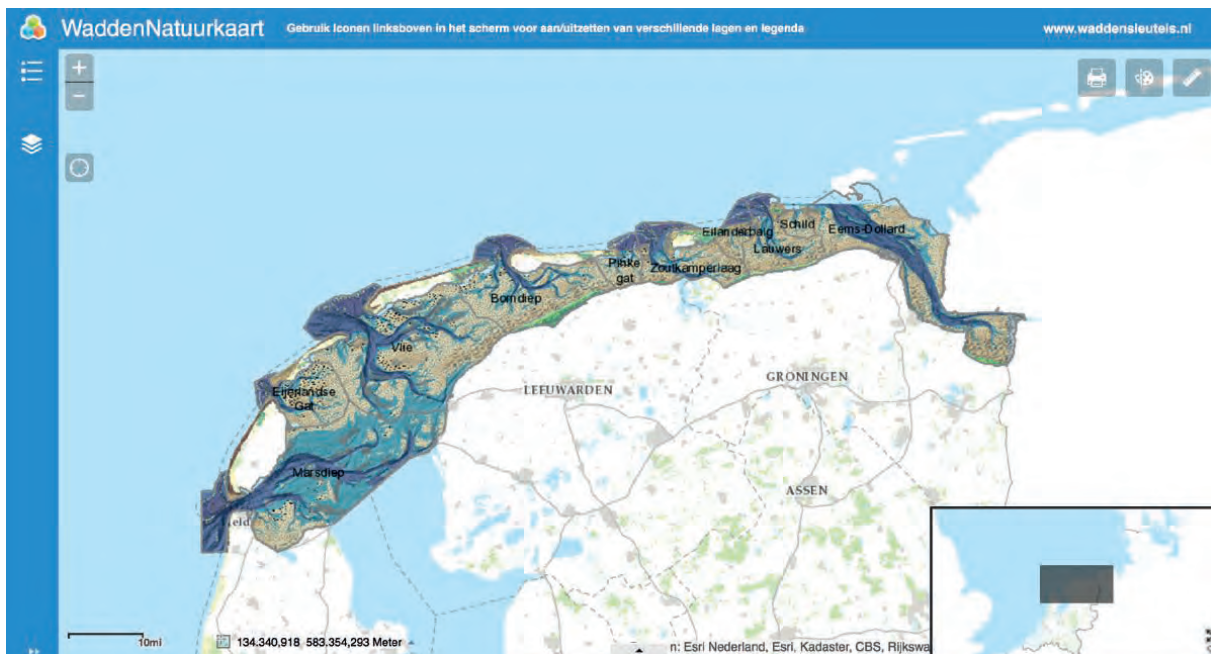


Fig. 1: The Wadden Sea in the Netherlands

.Map: Marjolijn Christiansen www.waddensleutels.nl

Climate Change is real. Preservation of natural World Heritage sites such as the Wadden Sea needs to take the effects of climate change into account. One of the foremost impacts of climate change is a rising sea level. Should the sea level rise significantly, shallow inland seas like the Wadden Sea may very well 'drown'. In that case none of the natural characteristics will remain that were crucial to its inscription on the World Heritage List.

The Wadden Sea is a shallow inland sea between the North-West European continent and a string of sandy islands. Twice a day at low tide the sea turns to land. Brave athletic people can walk from the mainland to one of the islands in the time-window between two tides. Birds have the same time-window to feed from the Waddensea's rich bottom-dwelling populations of mussels and cockles. The fragile balance of tides and exposed seabed is one of nature's unique ways to shape landscape and ecosystems and was key to the nomination by the Dutch, German and Danish governments of the Wadden Sea for UNESCO World Heritage Status. In 2009 the Wadden Sea was accepted on the global list as one of the world's natural wonders. Subsequent extensions have occurred.

Under UNESCO every government entrusted with the management of a World Heritage Site needs to present a State of Conservation (SOC) Report. The most recent SOC report was submitted to the UNESCO World Heritage Secretariat in November 2016. In the report the Danish, Dutch and German governments express their concern that "climate change may have an impact on many different Wadden Sea ecosystem features and elements, human activities and interests, at various spatial and temporal scales. It is important to recognize that climate change is a cross-cutting theme. Therefore, dealing with impacts of climate change requires an integrative approach across borders, disciplines, sectors and administrative layers (ICZM)."

A clear omission in the SOC Report by the three governments (all three parties both to the UNESCO conventions as well as the Paris Agreement on Climate Change) is their failure to relate the positive impacts of the Paris Agreement to the protection of the Wadden Sea. Ensuring no new exploration for fossil fuels underneath the WHS and a global reduction in the emissions of CO₂ (in other words the use of fossil fuels) may very well prevent further impacts of climate change on the Wadden Sea World Heritage property.

In their 2016 SOC report the State Parties responsible for the proper management of Wadden Sea World Heritage outline the need for climate change adaptation policies and measures but fail to take any initiative to prevent climate change by allowing more fossil-fuel mining underneath the Wadden Sea World Heritage property.

Reports by WWF and Waddenvereniging have clearly outlined that new or increased extraction of fossil fuels is a threat to the protection and preservation of the Wadden Sea. Specifically, the Dutch government appears to be ignoring these warning signals and intends to facilitate, and financially benefit from, further fossil-fuel extraction beneath the Wadden Sea WHS.

State parties, as well as energy companies such as Shell and Exxon/Mobil, are still keen on realizing new projects for fossil-fuel mining. Currently the Dutch government aims to extract 4 billion cubic meters of natural gas from underneath the Wadden Sea WHS. This will lead to an additional future CO₂ emission of 7.2 billion kilograms.

Under the latest Dutch Mining Act, some restrictions have been set on new mining projects. Mining installations are not allowed within the legal borders of the Wadden Sea World Heritage site. However, the use of mining installations only a few meters outside the World Heritage property is still legal. It is not only legal in a crooked kind of, it is also strongly supported by the Dutch government both legally and financially. Knowing this legal loophole, energy companies and their investors take the somewhat cynical position that “as long as it’s legal we can do it”. The effects of fossil-fuel mining on the World Heritage property are however identical. No matter if a mining installation operates within or just outside the legal limits of the WHS, the effects on both nature and climate are the same. In the new Mining Act the Dutch government appears to take the commercial interests of energy companies far more seriously than its obligation to UNESCO to preserve and protect the outstanding universal values of WHS Wadden Sea.

A recent report presented by Waddenvereniging, and peer-reviewed by some of the most prominent Dutch scientific experts on climate change, clearly warns the authorities of the likelihood that Wadden Sea will ‘drown’¹ – particularly in the event that the Dutch government continues to facilitate fossil-fuel mining underneath the property.

NGOs such as Waddenvereniging have repeatedly presented their concern about the impacts of fossil-fuel mining for the preservation of WHS Wadden Sea because of its local effects. The interrelated local effects of mining in combination with the global effect of using fossil fuels should concern governments

responsible for the protection and conservation of the Wadden Sea World Heritage property. This applies not only in relation to climate-change adaptation strategies, but perhaps even more so in strategies to prevent the extraction of fossil fuels from World Heritage sites.

There is a lack of such strategies by the Dutch government. It would be both logical as well as useful should the World Heritage Committee provide clear guidance to all parties to the Convention about the need for the prevention of CO₂ emissions due to activities affecting World Heritage sites – especially when climate change is considered a potential risk to the site concerned, as is the case for the WHS Wadden Sea. This would also be a way for UNESCO and its World Heritage Committee to contribute to, and strengthen, the Paris Agreement on Climate Change.

But on a more emotional and moral level it would be wonderful should the WH Committee decide that the world’s most unique natural sites cannot be put in a position where they contribute to the world’s most pressing environmental problem. The Wadden Sea should not be an accomplice to one of the largest threats to its own preservation and conservation.

The commercial pressure to explore and extract fossil fuels from beneath the Wadden Sea is enormous. Various international energy companies and corporate investors appear to prefer numbers over nature. The risk that the Wadden Sea World Heritage property may drown due to the effects of fossil-fuel mining and global warming are still ignored by the State Parties responsible for its protection and preservation.

Knowing the most recent scientific report on climate change and its effect on the Wadden Sea, and knowing the immense financial pressure exerted by energy companies on national and local authorities to continue fossil-fuel extraction from beneath the Wadden Sea World Heritage property, we propose that the World Heritage Committee, at its next session, presents clear guidelines that call on the States Parties to:

- Abstain from any commercial mining initiative within, underneath or adjacent to a WHS that will lead to CO₂ emissions thus ensuring that the conservation of a WHS is also beneficial to the obligations of State Parties under the Paris Agreement on Climate Change;

Should the World Heritage Committee adopt such guidelines it will be a huge message of support to the local (Noard East Fryslan, Texel, Vlieland, Terschelling, Ameland, Schiermonnikoog) as well as regional (Fryslan, Groningen and North Holland provinces) authorities that all strongly object to any new fossil fuel mining initiative but then to be overruled in their concern by the national government of The Netherlands. As it stands, the national government fails to take the genuine concerns of local communities about the integrity of WHS Wadden Sae in consideration.

¹ Schuttenhelm, Rolf, ‘De toekomst van de Waddenzee: een stijgende zeespiegel over een dalende bodem’, https://waddenvereniging.nl/ww/images/PDF/Toekomst%20van%20de%20Waddenzee/ToekomstvandeWaddenzee_rapport.pdf

The Real State of Conservation Report on Slovak Beech Forests



WOLF Forest Protection Movement

Slovakian beech forests were inscribed in the UNESCO World Heritage List in 2007 as part of a bilateral (with Ukraine) World Heritage site "Primeval Beech Forests of the Carpathians". After two extensions in several other countries, the current name of this UNESCO World Heritage site is "Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe".

In the nomination project, the Slovak components were declared protected on national level as Strict Nature Reserves¹ according to the IUCN Protected Area Categories System on an area of 5,770 hectares. Unfortunately, the Slovak Republic declared to the UNESCO authorities a state which was non-existent. The territory designated as the Slovak components has never been protected under the Ia category – Strict Nature Reserve, referred to in the nomination project.

During the preparation of the nomination project for the Slovak components in 2005, there were no negotiations with owners and users of the area, general public and non-governmental organizations. The result was the failure to acknowledge the areas as World Heritage by local communities.

The problem was also the localization of the area itself. The only available maps were those attached to the nomination project but the scale of these maps didn't allow to identify and mark the boundaries in the field. Practical protection of the Slovak components was therefore impossible. Another problem was that the boundaries in the maps delineated an area much smaller than defined in the text documents.



Fig. 1: The location of Poloniny National Park and Vihorlat Landscape Park, two Slovak components of the "Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe".

Map: Marek Wieckowski <https://journals.openedition.org/rga/2107/> modified by Stephan Doempke

Even after inscription on the UNESCO World Heritage List in 2007, logging and hunting were carried out without restrictions. Over 3,860 hectares of the area were threatened by permanent extensive logging activities. Hunting has been occurring there continuously, including group hunting, building of new hunting facilities and even hunting for wolves. In addition, development activities as a new ski resort, which would require permanent deforestation and a new road border crossing to Poland were planned in the area.

WOLF has been bringing attention to the inadequate protection of the Slovak components since 2008. During these years we did a lot of activities including communication with the World Heritage Centre and the World Heritage Committee, due to our activities the UNESCO/IUCN advisory and monitoring missions were sent to Slovakia, we have attended World Heritage Committee Sessions in Bonn 2015 and Krakow 2017 where we were lobbying for the proper protection of the property, we did a lot of monitoring in the field, consultations with local stakeholders and local communities and a lot of other activities. Most importantly, we effectively created pressure by the international community on the national government as the OUV of the property has become endangered.

We have informed the World Heritage Committee several times about the violation of the protection of Slovak components by

¹ Category Ia: Strict Nature Reserve - Protected areas that are strictly set aside to protect biodiversity and also possibly geological/geomorphological features, where human visitation, use and impacts are strictly controlled and limited to ensure protection of the conservation values. Such protected areas can serve as indispensable reference areas for scientific research and monitoring: <https://www.iucn.org/theme/protected-areas/about/protected-areas-categories/category-ia-strict-nature-reserve>

Slovak Republic, and our findings have been incorporated in the decisions adopted during the 41st and 43rd session of the Committee².

A warning example is the development of logging in Zbojský potok valley in Poloniny National Park since 2006, shown on the aerial photos. This can be for sure considered a serious threat to the Outstanding Universal Value of the property.



Fig. 2: Aerial view of Zbojský potok valley in 2006. Photo: EUROSENSE s.r.o.



Fig. 3: Aerial view of Zbojský potok valley in 2016. Photo: EUROSENSE s.r.o.

The breaking point was the Decision of the World Heritage Committee (WHC) on its 41st Session in 2017, which was very critical to state of conservation of Slovak components. The World Heritage Committee

- “Considers that, unless urgent measures are taken to address the lack of an adequate protection regime of the Slo-

vak components of the property and to ensure that their boundary delineation is adequate, their protection from logging and other potential threats cannot be guaranteed in the long-term, which would clearly constitute a potential danger to the OUV of this serial transnational property as a whole, in line with Paragraphs 137 and 180 of the Operational Guidelines”, and

- “notes with utmost concern that, despite these measures and the voluntary commitment of some entities involved not to carry out logging operations, only parts of the Slovak components of the property are currently legally protected against logging”.
- The reaction of Slovak authorities was to start a renomination process with proposals for new boundaries and new strictly protected areas. A non-intervention regime has been applied within the newly proposed boundaries of the property – either by means of legal protection of existing protected areas or beyond these nature reserves. The non-intervention regime has been endorsed by two Resolutions of the Slovak Government (no. 528/2017 of November 2017 and no. 508/2019 of October 2019). To ensure long-term protection, three new projects for nature reserves are in preparation.



Fig. 4: An aerial view of Morské oko National Nature Reserve shows an uninterrupted forest cover in the entire reserve, with large areas of primary forest. Photo: WOLF Forest Protection Movement



Fig. 5: Fully undisturbed vegetation cover at Morské oko. Photo: WOLF Forest Protection Movement

2 <http://whc.unesco.org/en/sessions/41com/> and <https://whc.unesco.org/en/sessions/43com/>

Despite these positive efforts, the former leaders of the Ministry of the Environment of the Slovak Republic in February 2020, a few weeks before the election, were trying to misuse the process of boundary modification of the Slovak components to abolish the strict protection in the part of the existing Morské oko National Nature Reserve (see Fig. 4 and 5). Their proposal would allow the construction of hotels, guesthouses, roads, logging, hunting and development of tourist infrastructure in the one of the most valuable natural areas in Slovakia.

Within the process of public consultation WOLF prepared a comment asking for upholding the strict protection in the whole Morské oko National Nature Reserve. The comment has been undersigned by 70,000 people in 5 days. The mayors of both affected villages also officially expressed their interest in the name of the citizens to preserve the existing strict protection of the whole area, and more than 20 organisations and individuals from all of the world declared their support by sending letters to the World Heritage Centre and national authorities.

Thanks to this unbelievably strong support from the public, the new Minister of the Environment, Mr. Ján Budaj, has reopened negotiations and accepted the requirements stated in WOLF's comment.

An important lesson learned from this case is the weakness and the lack of authority of the World Heritage Committee against the State Parties. World Heritage is officially declared as "the priceless and irreplaceable assets, not only of each nation, but of humanity as a whole" but the above stated case study of Slovak beech forests shows very clearly that there are no effective measures to ensure the proper protection of the World Heritage Sites if there is no will of the State Party. Even 13 years after the inscription of the Slovak components on the List of World Heritage Sites they are still missing legal protection.

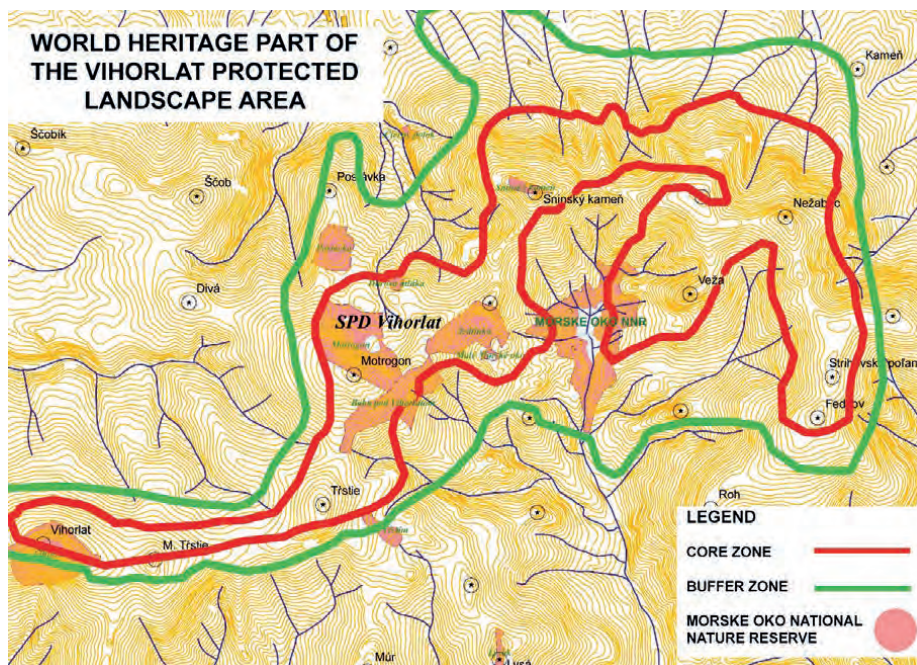


Fig. 6: Current zoning situation of the Vihorlat Landscape Park. Morské Oko National Nature Reserve is partly in the core zone and partly in the buffer zone of the Vihorlat component of the World Heritage property.
Map: State Nature Conservancy of Slovak Republic / modified by Andrea Martinez

The World Heritage Committee and World Heritage Centre can improve their tainted reputation by serious supervision of the ongoing renomination process and by putting the pressure on Slovak government to successfully finish the process of establishment of new proposed strictly protected areas (nature reserves).

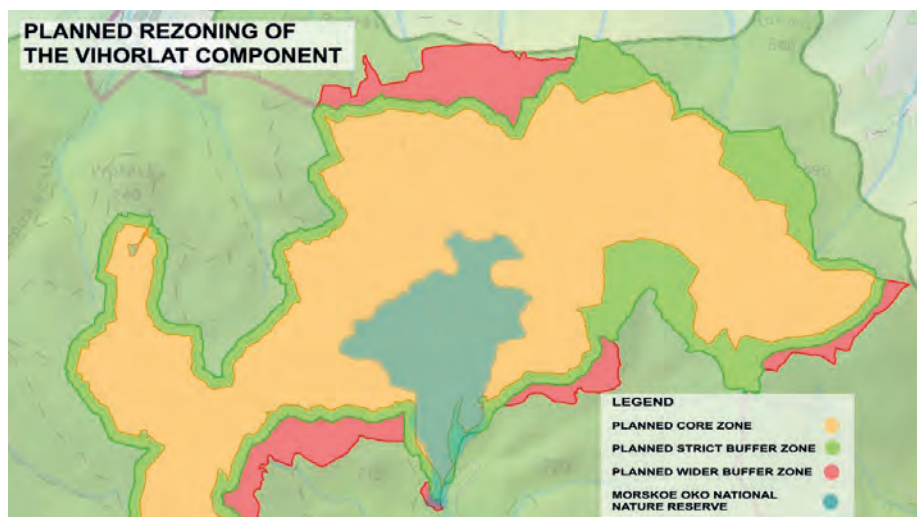


Fig. 7: Under the new zoning proposed by the Ministry of the Environment, most of Morské oko NNR would become part of the core zone but the level of protection would be downgraded to that of the surrounding Vihorlat Landscape Park. The rationale for drawing the boundary lines remains unclear.
Map: State Nature Conservancy of Slovak Republic / modified by Andrea Martinez

Logging in Romania's Paradise Forests

EuroNatur Foundation and Agent Green



When one thinks of the natural wonders of Europe, Romania does not necessarily spring to mind as a country home to some of the largest areas of forests of outstanding universal value. However, **hosting at least 500,000 hectares of potential primary and old-growth forests (Schickhofer and Schwarz 2019), Romania is easily home to the lion's share of intact forests in the European Union outside of Scandinavia.** Few would appreciate that Romania is home to some of the largest and healthiest populations of large carnivores - bears, wolves and lynx - in all of Europe. However, these ancient forests are being logged before the eyes of the European Union (EU), even at a time when the European Commission has communicated its intent to step up action to protect and restore the world's forests. Logging, both legal and illegal, is occurring in Natura 2000 sites, national parks and in the buffer zones of UNESCO World Heritage areas, immediately adjacent to the core inscribed properties. The impacts on the integrity of the World Heritage property are undeniable.

In 2007, Europe's ancient beech forests were first inscribed in the World Heritage List, with sites in Slovakia and the Ukraine forming a cross-border property Primeval Beech Forests of the Carpathians. This site was extended to Germany in 2011, and then 10 countries successfully added further forest sites to the property - now known as Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe - in 2017. This uniquely complex serial site now covers 92,023 ha across more than 40 protected areas located in 12 European countries. The Romanian component of this 2017 extension (23,983 ha) disproportionately comprised almost 40% of the 10-country addition (61,660 ha) to the existing site. **In total, Romanian forests make up 26% of the entire 12-country World Heritage listing, making it by far the largest contribution from a country in the EU.**

These component areas were added to the World Heritage List under criteria (ix) of the World Heritage Convention as 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 Romanian components are described, amongst other rich ecological and biodiversity values, as including important refuges of virgin forests, being of a high degree of naturalness, and supporting a vast

array of plants and animals including endemic, rare and threatened species (Kirchmeir and Kovarovics 2016).

However, the Romanian forest sites included in the list certainly do not represent all forests of outstanding universal value. Many forests sites of equal natural value as those included in the property are being logged and under threat from future logging activities.

Timeline of significant related World Heritage events

2017

Romania's forest areas added to *Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe* World Heritage Listing (Decision 41 COM 8B.7).

2018

Informal IUCN Field Trip to Domogled – Valea Cernei and Semenic - Cheile Carasului National Parks - visits to logging sites adjacent to World Heritage areas.

July 2019

Noting with concern, the World Heritage Committee puts Romania on notice for allowing logging within buffer zones of the Romanian components of the World Heritage property. World Heritage Committee requests a Reactive Mission to Romania to assess the situation (Decision 43 COM 7B.13).

Nov 2019

World Heritage Centre/IUCN Reactive Mission to Romania. Further forest parcels adjacent to the World Heritage auctioned by Romsilva, Romania's state forest agency only 10 days after the mission is due in Romania.

For decades, scientists and conservationists have been raising the alarm about the scale and intensity of logging in Romania and the government's abject lack of serious commitment to protecting natural values. The situation today, where ancient forests of outstanding universal value continue to be logged, is the consequence of years of terrible forest governance - over-logging, illegal logging, corruption, mismanagement and

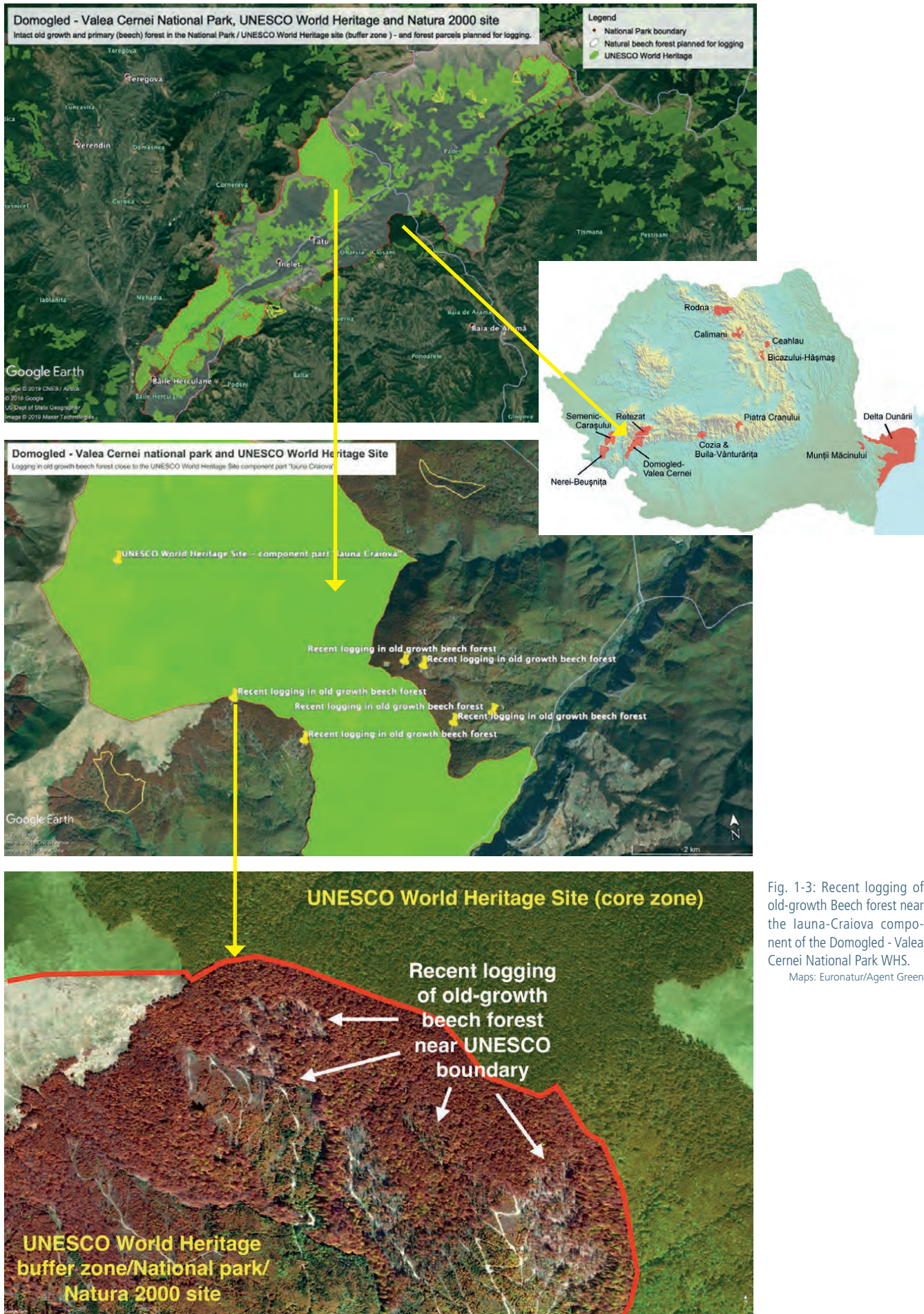


Fig. 1-3: Recent logging of old-growth Beech forest near the Iauna-Craiova component of the Domogled - Valea Cernei National Park WHS.
 Maps: Euronatur/Agent Green

a ubiquitous defiance of the rule of law. Even in 2017, when the Romanian sites were nominated to be listed, IUCN and World Heritage Centre specialists raised concern over the Romanian government's lack of commitment to the World Heritage Convention and the protection of outstanding universal values of natural sites.

As a result, commercial logging which threatens the integrity of the UNESCO site through habitat fragmentation and loss continues. **At the time of writing, it has been revealed that more forest areas within the UNESCO buffer zone and adjacent the UNESCO listed site - forests containing values equivalent to those within the UNESCO site - will be auctioned at the end of November 2019 and logged in 2020.**

Domogled - Valea Cernei National Park – a case of worse practice

Domogled - Valea Cernei National Park in south-west Romania harbours towering limestone mountain peaks, natural thermal springs, deep gorges, spectacular waterfalls, impressive cave systems, large tracts of ancient, pristine forests and critical habitat for a plethora of protected plants and animals. 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 of the core UNESCO site constitutes the formal buffer zone of the site. The situation in Domogled - Valea Cernei National Park is probably the best understood and also the most serious in regards to commercial logging adjacent the World Heritage site and within the site's formal buffer zone.

Park management staff openly talk about commercial logging within the park as if it is completely normal. Forest management is intense and commercially driven. It is mainly based upon "progressive cutting" (stepwise 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). This "progressive cutting" simply means that rather than an area being completely cut in one go, it is cut over a period of about 10 to 15 years. 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).

In many parts of the park, virgin forests that are supposed to be protected under Romanian law but have not yet gone through the difficult bureaucratic process of listing them, are illegally logged without effective criminal prosecution. Even in the strict non-intervention zones of the park, illegal logging has taken place.

In 2017, logging and road cutting was identified in virgin forests in the upper catchment of the pristine Cerna River. More recently, excursions to the park - including with members of the European Parliament, and during an informal visit with the European director of IUCN - have revealed firsthand the devastating commercial logging within the park. Logging progresses into the remotest areas of the park where the last strongholds of ancient beech forests are found. Only in the spring of 2017, a new logging road was cut in the Radoteasa valley, in the middle of a large untouched forest landscape, which is located between two UNESCO World Heritage site component parts.



Fig. 4: Logging road within the UNESCO buffer zone Domogled - Valea Cernei National Park.

Photo: Matthias Schickhofer

As has been previously communicated to IUCN and the World Heritage Centre, logging is happening at the immediate border of the UNESCO World Heritage site. In November 2019 Romanian conservationists witnessed recent logging activity at the border of the launa-Craiova component part of the UNESCO World Heritage property. The beech forests neighbouring the property - and earmarked for logging - are similar to the forest inside the World Heritage component part and share the same outstanding universal value. Even though they exist within the national park, they are not protected from logging.

Domogled - Valea Cernei National Park is also a designated EU Natura 2000 site. Nevertheless, irreplaceable primary and old-growth forests are continuously being degraded and deteriorated with approval of the national park administration and Romsilva, Romania's state forestry agency.

These future logging plans, supported by the previous Romanian government, represent a clear disregard for UNESCO values and for the World Heritage Convention. It is not clear yet how the new government will deal with the progressing logging issue in Romania's protected areas. Any deliberate damage to a component part in one of the participating countries threatens the 12 country property as a whole and the Romanian government's ongoing logging plans, which undermine the en-



Fig. 5: Tree marked for logging adjacent to the border of the World Heritage site Domogled Valea - Cernei National Park. Photo: Alexandru Teleaga

tire property, could lead to the property being listed "In Danger" in the future.

Romania's ancient forests are a true treasure of European natural and world heritage. Urgent intervention is required to ensure that as much of what remains of them is protected for all time.

In addition, the issue of logging in buffer zones of World Heritage Areas is not isolated to the Romanian World Heritage component sites. We therefore request the World Heritage Committee to urge the World Heritage Centre and advisory bodies to set standards for buffer zone management that clearly pro-

hibit industrial exploitation use of recourses - such as commercial logging - within buffer zones of World Heritage properties. Natural habitats deserve reliable 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 Romania's ancient beech forests of outstanding universal value. We 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 almost all forests within the UNESCO buffer zones are under the management and ownership of the Romanian state, this should be achievable without the need for financial compensation for private land owners;
- National Parks and UNESCO World Heritage sites be promoted as places where nature conservation is paramount and adequately funded and world's best practice management prioritises the protection, promotion and restoration of natural ecosystems, not the exploitation of natural resources.

References

- European Commission (2019). *EU Communication (2019) on Stepping up EU Action to Protect and Restore the World's Forests*, 23 July 2019, viewed 6 November 2019, https://ec.europa.eu/environment/forests/eu_comm_2019.htm
- Kirchmeir, H. and Kovarovics, A. (eds.) (2016). Nomination Dossier "Primeval Beech Forests of the Carpathians and Other Regions of Europe" as extension to the existing Natural World Heritage Site "Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany" (1133bis). Klagenfurt, 409p
- Schickhofer, M. and Schwarz, U. (2019). PRIMOFARO. Inventory of Potential Primary and Old-Growth Forest Areas in Romania. Report for EuroNatur.
- UNESCO World Heritage Centre (2017). Operational Guidelines for the Implementation of the World Heritage Convention

Old New Threats to the Virgin Komi Forests World Heritage Property

Mikhail Kreyndlin, Andrey Petrov, Alexandra Tevkina, Greenpeace Russia



In order to promote gold mining, attempts to withdraw 50,000 hectares of land from the Yugyd Va National Park are continuing despite the sites recognition as a significant part of the Virgin Komi Forests World Heritage property.¹

In 2019, Russian state organizations such as the 'All-Russian Research Institute of Environmental Protection (VNIIEkologiya)' (subordinate to the Ministry of Natural Resources of Russia), began preparing documentation relevant to the boundary changes made to the national park. According to the Terms of Reference of this work, its goals are to assess the damage incurred by the forest as a result of partial seizure of the national park and World Heritage property.

The Government of the Komi Republic has prepared a draft decision aimed at the Russian Federal Government regarding the changes made to the national park's boundaries, in which it promotes the exclusion of the territory for gold mining. However, as stated by the State Party of Russia, in their 2019 'State of Conservation Report', submitted to the World Heritage Centre, "controversial issues about economic activity in the licensed territory of the Chudnoye deposit have heretofore not been settled".

The territories that are supposed to be attached to the national park are still being largely violated by past economic activity. The forests are subject to logging and exploratory works as well as mass fire clearings. These activities are clearly visible on publicly available satellite images (*see maps*). It should be noted that in 2014, Russia made a submission to the World Heritage Center with the aim to apply boundary changes to the World Heritage property. The desired changes included the withdrawal of a site in the northern part of the park, with an area of 48,000 hectares – inclusive of the Chudnoye Field, as well as the addition of 180,000 hectares of land south of the park (Decision 39 COM 7B.23).

Preliminarily, the Komi Scientific Center of the Russian Academy of Sciences conducted a survey of this territory and came to the following conclusions.

The 'Institute of Biology' at the 'Komi Scientific Center of the Russian Academy of Sciences' states in a letter, dated 05.24.2013, (No. 17641-1256 / 694): "according to scientists of the Institute of Biology, the expansion of the area of the Virgin Komi Forests at the expense of sites located on the watershed of Schugor and Podcherem rivers in the upper reaches of Il'ych River should not be considered as compensation for the withdrawal from its structure of a site located in the basin of Balbanju River. Since 2006, specialists from the Institute of Biology have carried out field studies here annually, during which about 70 species of rare species of vascular plants, bryophytes, lichens, and fungi listed in the Red Book of the Komi Republic (2009) were identified." Thus, the information that the Chudnoye territory belongs to disturbed areas that have lost their value and, accordingly, also is of lesser value than the sites proposed for inclusion in the boundaries of the World Heritage property, does not correspond to reality.

The UNESCO World Heritage Committee has repeatedly (for example, in decisions 36 COM 7B.24², 40 COM 7B.99³, 42 COM 7B.78⁴ demanded that Russia cease all industrial activities within the boundaries of the Virgin Komi Forests World Heritage property and that it revoke the license for gold mining in the territory of the Yugyd Va National Park.

The failure of the Russian State party to comply with the decisions of the World Heritage Committee is a violation of its obligations to the UNESCO Convention concerning the Protection of the World Cultural and Natural Heritage.

According to § 180b of the Operational Guidelines for the Implementation of the World Heritage Convention, one of the criteria for the inscription of properties on the List of World Heritage in Danger is that the property is faced with major threats, which could have deleterious effects on its inherent characteristics. Such threats are, for example:

- i) a modification of the legal protective status of the area;

¹ [https://www.telegraph.co.uk/news/2019/07/21/russia-plans-rezone-europes-largest-national-park-access-coveted//](https://www.telegraph.co.uk/news/2019/07/21/russia-plans-rezone-europes-largest-national-park-access-coveted/)

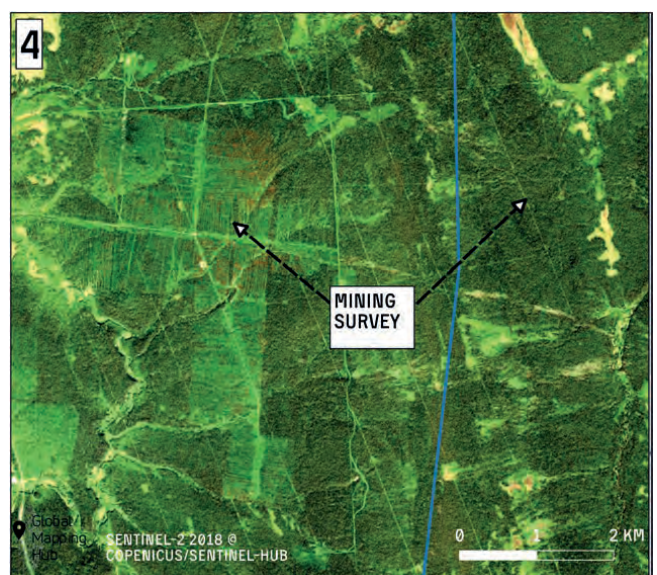
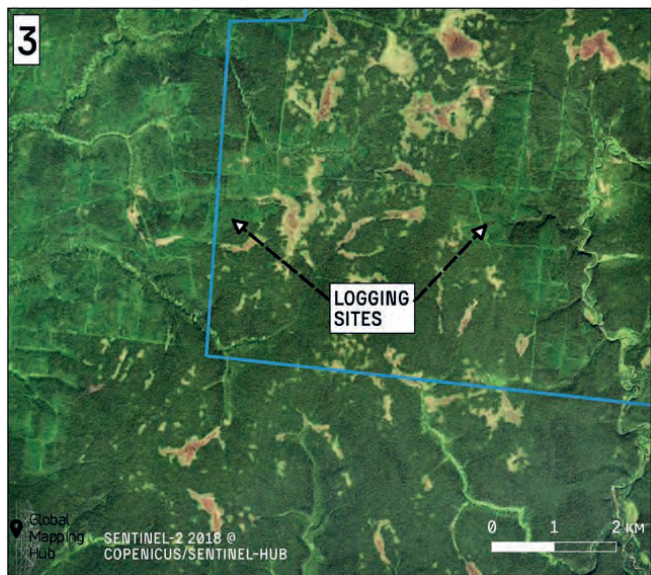
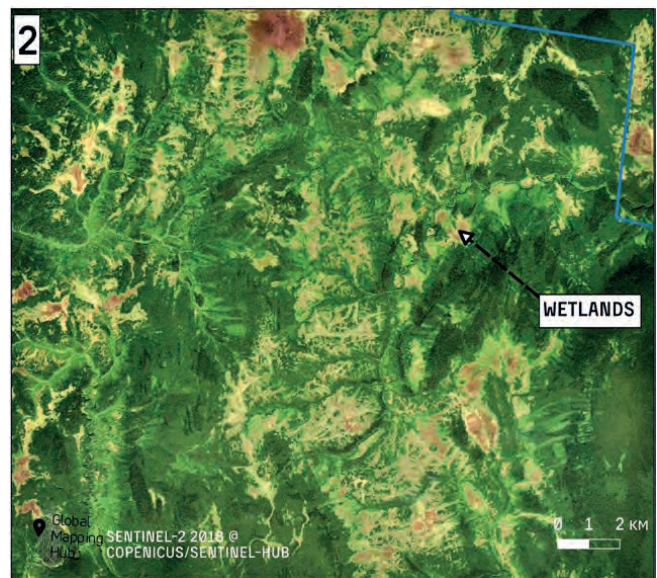
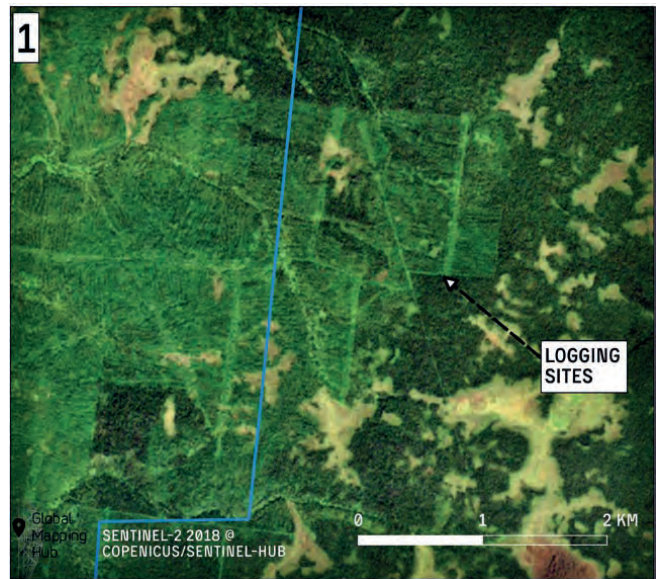
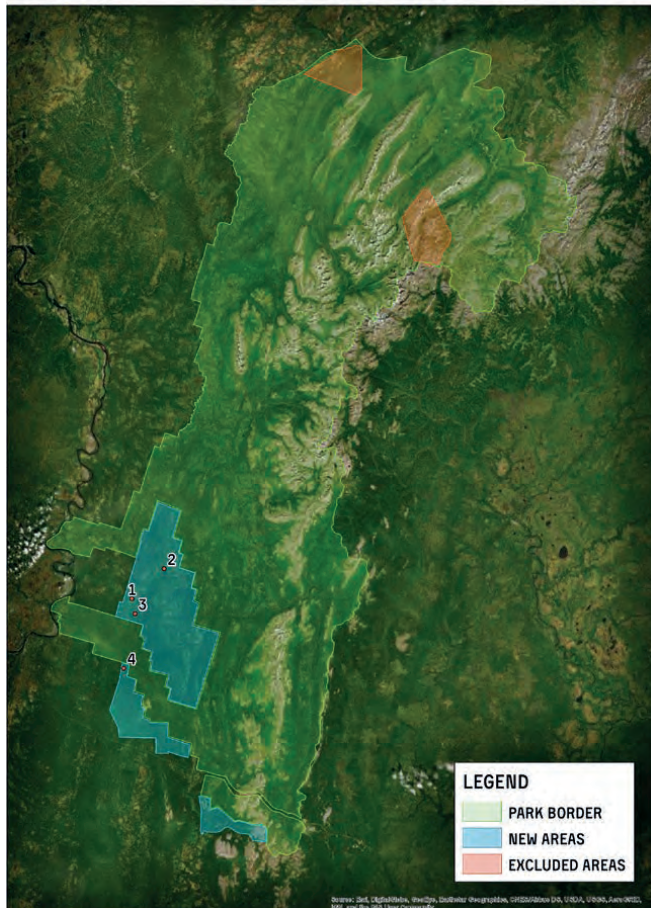
² <http://whc.unesco.org/en/decisions/4673>

³ <http://whc.unesco.org/en/decisions/6762>

⁴ <http://whc.unesco.org/en/soc/3667>

Thus, the World Heritage Committee should once again request the State Party of Russia revoke 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 borders of the Yugyd Va National Park. The Committee should also consider the possible inscription of the property to the List of World Heritage in Danger, in the case that the Russian State Party fails to comply with these requirements.

"YUGYD VA" NATIONAL PARK



Ski Resorts, Road Construction and Logging in the Western Caucasus

Mikhail Kreindlin, Greenpeace

Yulia Naberezhnaya, Russian Geographical Society

Yuri Vorovskoy, All-Russian Society for the Protection of Nature



The threats outlined in the 2019 review still remain relevant. Furthermore, the situation in the Western Caucasus World Heritage Site continues to deteriorate. An increase in man-caused impact was noted at almost all components of the Site or near its boundaries. The reasons for this situation are directly related to the soft line of UNESCO regarding the systematic non-compliance with the Decisions for this site that have been taken place for over ten years.

Since the 2014 Winter Olympics, the property has faced a disturbing southern neighborhood in the form of alpine ski resorts, two of which, Rosa Khutor, LLC and Gazprom, continue to plan for expansion. While Gazprom complies with the current legislation, so far limiting itself to planning and developing design documentation pending a decision on the establishment of so-called “biosphere polygons”, Rosa Khutor is very aggressively expanding its infrastructure, ignoring the natural value of the protected area as well as the current environmental legislation regarding the Environmental Impact Assessment (EIA) and taking into account public opinion. Within the past year, the ski resort of Rosa Khutor and its affiliate Ober Khutor continued the construction of two motorways towards the boundaries of the Caucasus Nature Reserve without a State Environmental Review, including an EIA and public discussions of the planned economic activity.

The second new motorway passes along the southern slope of the Aibga ridge towards the Turyi Mountains, also towards the boundary of the Caucasus Nature Reserve. About 20 kilometers of dirt road have been laid so far. Both motorways pass through the Sochi National Park, which was supposed to become part of the Western Caucasus property and was included in the nomination in 2015, suddenly withdrawn by the Russian Federation at the final stage, presumably on the initiative of the owners of the Rosa Khutor alpine ski resort.

Prior to the 2014 Winter Olympics, it was also planned to add the Sochi Republican State Natural Reserve to the Caucasus Nature Reserve. Instead of complying with this clause, Roza-Khutor and its affiliates Ober-Khutor, Dolina Vasta, Roza-Club, and Turyev Khutor, leased 220 land plots in the Sochi

National Park and the Sochi Republican State Natural Reserve (the upper reaches of Mzymta river) for 49 years¹ without tendering in order to implement the large-scale investment project “Development of the Krasnaya Polyana Territories for the purpose of Tourism and Recreation in 2016-2028”. After entering into the lease agreements, the right of the Sochi National Park and the Caucasus Nature Reserve to permanent (indefinite) use of these land plots was terminated. Due to the plans to expand the alpine ski resorts, the implementation of measures was halted for the restoration of the ecosystem of the Mzymta River, integrated environmental monitoring and preparation of compensation measures for the XXII Olympic and XI Paralympic Winter Games in Sochi, which were part of Russia’s pre-Olympic commitments.

The large-scale construction planned under the guise of the development of eco-tourism in the World Heritage Site will inevitably cause the degradation of natural habitats of the adjacent part of the Site and, as a result, the loss of its outstanding universal value. It is likely that after the end of the 2020 winter season, Rosa Khutor will commence the construction of the infrastructure facilities directly on the leased land plots in the Engelmann Meadow area, since so far the motorway ends right there.

In connection with the plans for expanding ski resorts under the pretext of the development of eco-tourism, it is required to clearly and unequivocally articulate the closed list of permissible infrastructure facilities to prevent the relaxation of the protection regime and the direct destruction of the protection subject during the process of the eco-tourism development. Furthermore, the opinion of the scientific department of the Caucasian Reserve and the Sochi National Park should be taken into account at all stages of drafting and implementing the development programs, first of all when choosing the land plots subject to economic activities and as well as the permissible recreational load.

¹ In accordance with Resolution No. 566-r of the Government of the Russian Federation dated March 30, 2017

In Decision 42COM 7B.80 [7], the Committee has expressed serious concern about the lease of the land plots aimed at the implementation of large-scale sports and recreational projects which immediately border the Site and are located inside the Sochi Federal Nature Reserve and the Sochi National Park. The Committee requested the Russian State Party not to allow any construction of large-scale infrastructure in areas directly adjacent to the Site, especially in protected areas, if such construction could adversely affect the outstanding universal value of the Site, which should be assessed within the EIA for each proposed site in accordance with the IUCN World Heritage Impact Assessment Guidelines. However, construction of the motorways towards leased plots suggests that UNESCO's position on this issue is still ignored.

The territory of the property located in the Republic of Adygeya also continues to experience increasing human impact, both at and within its boundaries. This concerns chiefly the republican natural monuments which form part of the Heritage Site. In November 2018, a group of public inspectors of the Adygeya Republican branch of the All-Russian Society of Nature Preservation found signs of ongoing large-scale logging in the territory of the "Upper Reaches of Pshekha and Pshehashkha Rivers" nature monument. Commercial logging was carried out in the immediate vicinity of the boundaries of the Caucasus Biosphere Reserve under the guise of selective sanitary felling.

It was established that the Forest Administration of the Republic of Adygeya had transferred the protected natural territories, including the World Heritage Site area, for long-term lease to Tsitsa, JSC for logging. According to the inspection mentioned in order to verify the compliance by Tsitsa, JSC with the protection regime of the "Headwaters of Rivers Pshecha and Pshechashcha" nature monument, yet another illegal logging was observed in forest compartment No. 45 carried out by Tsitsa, JSC under the guise of selective sanitary felling. The prosecutor's office of the Republic of Adygeya has also confirmed the illegality of felling vigorous trees.

Nevertheless, the Forest Administration of Adygeya has yet neither terminated nor revoked lease agreements for logging in the natural monument territory, inconsistent with the environmental laws of the Russian Federation and its commitments under the World Heritage Convention. Tsitsa, the logger, has constructed a logging road through the territory of the "River Tsitsa headwaters" nature monument, and set up a site for cutting the logged wood and its loading onto vehicles, in direct violation of the regime of this natural monument.

According to agreement No. 2010504905018000002 dated April 12, 2018,² construction and installation works on the pro-

ject "Construction of the water intake and water supply main to the settlements of Maikop district and the city of Maikop (first start-up facility)" are moving forward.



Fig. 1: Construction of the water intake and water supply main to the settlements of Maikop district and the city of Maikop (first start-up facility). Photo: Yuri Vorovsky

This project provides for the construction of a water intake and a water supply main in conjunction with the existing one. The works have been planned within the "River Tsitsa headwaters" nature monument, also, in the boundaries of the "Headwaters of Rivers Pshekha and Pshehashkha" nature monument. In order to legitimize this from the point of view of Russian legislation, these natural monuments have been transferred to the status of "natural park", which means differentiated zoning and green light not only for the construction of a water conduit, but also for the legalization of other types of economic activities that threaten the value of the territory.

The most critical part of this project is the planned water intake inside the Caucasus Nature Reserve – the Vodopadisty water intake with a capacity of up to 25,000m³ of water per day, located at the northwest foot of the Fisht mountain. Moreover, it is planned to build a water intake, structures, a building, spring catchment, and to carry out other works without taking into account the protection regime of the reserve. This water intake is probably intended to supply a VIP alpine ski resort in Lunnaya Polyana, which continues to ignore all the UNESCO recommendations made over the past ten years.

In addition, the fact that all the territories on the Site, except the Caucasus Nature Reserve, do not have real protection, remains a serious problem. From the moment the object was created, natural monuments and the buffer zone of the Caucasian reserve function as forestry.

In 2019, the Government of Adygeya once again raised the question of constructing a ski resort on the Lagonaki Plateau. This time the resort is planned to be located at the headwaters of the Kurdzhips River in the eastern part of Lagonaki Plateau

² <https://synapsenet.ru/zakupki/fz44/0176200005518000197%231--adi-geya-resp-stroitelnomontazhnie-raboti-po-obektu-stroitelstvo-vodozab-ora-i-magistralnogo-vodovoda-k-naselennim-punktam-majkopskogo-rajo-na-i-goroda-majkopa-pervij-puskovoj-kompleks>

(see Fig. 2). In addition to the ski slopes, it is planned to build a parking for 1000 cars and hotels with 500 rooms. In the spring of 2020, these plans received support from the federal authorities. Despite the fact that this territory was initially included in the structure from the position of maintaining territorial integrity, for 2020 it is a vivid example of ecosystem restoration. The main argument against the construction of skiing infrastructure there is a dense river network in the area, which forms a strategically important supply of drinking water for the population.

At the same time, in September 2019, the International Co-ordinating Council of the Man and the Biosphere (MAB) Programme announced plans to exclude the Caucasus Biosphere Reserve from the World Network of Biosphere Reserves. This could lead to the removal of the status of the biosphere polygon from Lagonaki Plateau and, consequently, to the impossibility of developing ski resorts there.

To prevent this, ski resort lobbyists through State Duma Deputy Vladislav Reznik, introduced a draft law to the Duma according to which a decision on the status of a biosphere reserve can be made only by the Government of the Russian Federation, without taking into account the opinion of UNESCO.³

All these factors evidence that the Western Caucasus World Heritage Site is under threat. In order to preserve its key values it is required to:

1. Abandon the plans to construct alpine ski resorts on the Lagonaki Plateau and in the Sochi Nature Reserve, integrate the territory of the Sochi Federal Nature Reserve with the Caucasus Nature Reserve, having revoked the lease agreements with Roza Khutor and its affiliated legal entities pursuant to the Russian Federation commitments, assumed based on the recommendations of UNEP made before the 2014 Winter Olympic Games.
2. Ensure the compliance with the recommendations of the UNESCO World Heritage Committee, which have been given at its annual sessions for ten years since 2008 on transformation of Lunnaya Polyana ski resort into a real research center.

3. Expand the Site territory with the Psebay regional faunal area, which also pursuant to the Russian Federation pre-Olympic commitments must have been transferred to the Caucasus Nature Reserve.
4. Provide all areas within the Site territory under the jurisdiction of the Republic of Adygeya with real protection.
5. Establish an integrated system of the area protection and management, develop comprehensive plans for management and monitoring of the state of the key values.
6. Exclude from the Krasnodar Region Land Use Planning Scheme⁴ the plans for the construction of a 500kV overhead high-voltage power line via the territory of the Caucasus Nature Reserve, as well as the construction of motorways across the Site.
7. Strengthen legislation for protected areas and the control over its enforcement.

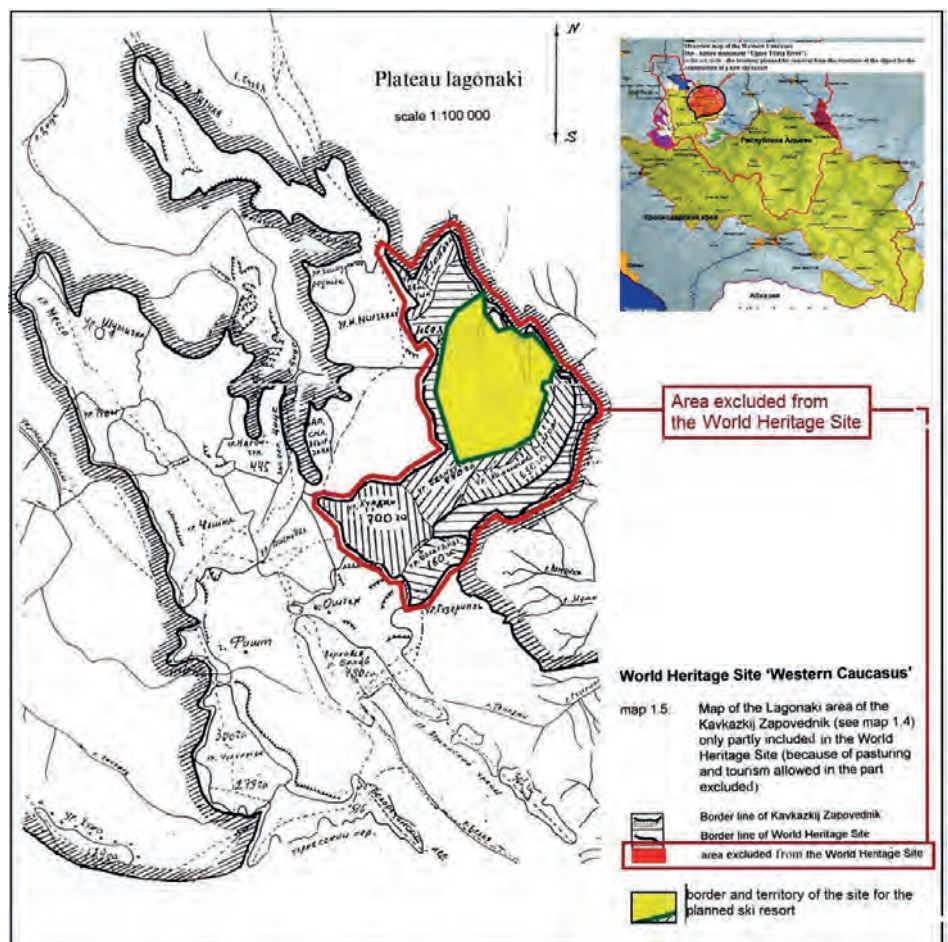


Fig. 2: Border and territory of the site for the planned ski resort.

Map: Yulia Naberezhnaya

³ <https://sozd.duma.gov.ru/bill/942749-7>

⁴ https://fgistp.economy.gov.ru/?show_document=true&doc_type=npa_term&uin=0300000020202201808062

Ile-Alatau State National Park in Danger

Valeriy Krylov, Sergey Kuratov, Nataliya Medvedeva and Svetlana Spatar, Ecological Society "Green Salvation"



The Ile-Alatau State National Park (hereafter Ile-Alatau NP) was established in 1996. 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. In 2002 Ile-Alatau NP was included in Kazakhstan's Tentative List for World Heritage nomination. On the nominated territory there are more than 1200 classes only of higher plants, rare and disappearing animals.¹

The legal regime of national parks is regulated by the Law On Specially Protected Natural Territories (hereafter "Law on SPNT") which declares² a priority of international treaties, in accordance with the Constitution (Article 4, §3) and other laws.



Fig. 1: Sky-high mountains of the Ile-Alatau National Park. Photo: Green Salvation

What threatens the park?

Even on the territory of national parks listed in the World Heritage List or Kazakhstan's Tentative List, the law allows for manipulation of the land. Zoning can be changed and the area of limited economic activity expanded (and this is already happening). Land lease is encouraged even for a period of 49 years. Moreover, the transfer of lands of SPNTs to the category of reserved lands (земли запаса) that can be privatized became legal.

Accordingly, natural habitats of Red List species can be leased out for a long-term use, which will lead to the destruction of ecosystems. This is contrary to the norms of the Convention on Biological Diversity which stipulates that each Party to the convention shall "promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings" (Article 8d).



Fig. 2: The Ile-Alatau National Park with its 5 components.

Map: Google Earth / Martin Lenk

Such contradictions in the legislation are enhanced by the arbitrary interpretation of conventions allowed by state authorities. For example, an attachment to the Prime Minister's reply to a request of the *Mazhilis's* (national parliament's) deputies regarding violations of the Law on SPNTs in Ile-Alatau National Park states: "To ensure that effective and active measures are taken for the protection, conservation and presentation of the cultural and natural heritage situated on its territory, each State Party to this Convention shall endeavour, in so far as possible, and as appropriate for each country..."³

Unauthorized Interventions

Another major problem is intervention of local executive authorities and other agencies in the activity of the national park of national importance. According to Article 10 of the law on SPNTs, representative and executive authorities of regions, cities of national importance and the capital do not have any authority to protect, preserve, and use SPNTs of national importance. According to Article 14 §2, national parks are SPNTs of national importance. They are managed by the Committee for Forestry and Wildlife (hereinafter "the Committee") of the Ministry of Ecology, Geology and Natural Resources. Intervention of local authorities in the activity of national parks on the grounds that a part of their territory is located within a city limit is illegal. Article 108 §6 of the Land Code states that "inclusion of lands into a city, town, or village limits does not entail ceding of property or land use rights to these lands." That is, administrative boundaries do not affect the main activity of national parks and do not change their subordination.

Violations of the Land Code

Local authorities flagrantly violate the norms of the Land Code. Not only the Akimat (Municipality) of Almaty, but also other agencies interfere in the activity of the Ile-Alatau National Park. Works on strengthening slopes and mudflow protection activities are allowed to be carried out in national parks, but despite of this, transfer of more and more new plots into the category



Fig. 3: Abandoned unfinished constructions can be found in many canyons in the park; here in Kimasar Canyon. Photo: Green Salvation

of reserved lands for the construction of various technical facilities continues. As a result, the integrity of ecological systems is more and more deteriorating, and their fragmentation is increasing. A significant part of the Ile-Alatau National Park has become inaccessible and even dangerous for visitors.

Third-party land use and ownership

No less serious problem is third-party (outside) land users and tenants. According to the Committee: "During 2017-2018, a commission of the Committee for Forestry and Wildlife ... conducted an inventory of land plots in the Ile-Alatau State National Natural Park. The commission received information that 77 third-party land users located within the national park do not have land title documents. Currently the National Park is taking legal steps to have the land plots returned.

"Because of the refusal of the Akimat of the City of Almaty to coordinate, a joint action plan for expropriation of lands from land users who do not have title documents, and the demolition of illegally constructed buildings in the national park has not been approved. In this regard, it is not possible to present an action plan."⁴

Along with the identification of third-party land users located within the National Park, the "Adjustment of the feasibility study of the Ile-Alatau State National Natural Park in the part of the master plan for the development of infrastructure" (hereinafter "2017 Adjustment") provides for a massive lease of lands of the national park.⁵

The review and modification of the functional zones of the national park continue. According to the 2017 Adjustment, the total area of the Ile-Alatau National Park is 199,252 ha. 52.8% of the park's land is transferred to the zone of limited economic activity and can be leased out.⁶ As of 1 July 2017, 104 land plots with a total area of more than 560 ha were leased out for a long-term use. 25 sites were leased out for short-term use (up to 5 years), including for construction of high-voltage 220 kV power lines which require the arrangement of protection strips of 25 m wide from the outside lines on the both sides.

In addition to the leased land, there are 167 land plots of outside users within the park, complicating its efficient management. According to the 2014 forest inventory documents, their total area is 1,304.257 ha. Despite the negative impact of the lease on ecological systems, the 2017 Adjustment states: "The Ile-Alatau SNNP is able to offer additional long-term and short-term leases of land, existing and planned buildings and structures for tourist use. Among the residents of the region, the number of businessmen who are willing to invest in the construction of guest houses, tourist centres, and similar facilities with a condition of further long-term lease is currently increasing."⁷ This means that destruction of the national park is officially sanctioned by state authorities.

At the same time several dozen buildings on the Ile-Alatau NP constructed both before and after the foundation of the park have been abandoned by tenants and outsiders and are gradually turning into ruins and waste dumps (Butakovka Canyon, Turgen Canyon, Almaarasan Canyon and others).

Livestock

There is livestock moving and grazing in almost all gorges of the Ile-Alatau NP. A particularly large number of livestock is concentrated in the Kaskelen and Turgen Canyons. Usually, grazing is uncontrolled, which leads to destruction of vegetation, contributes to soil erosion and the pollution of water sources. Livestock transfer alien plant species to the National Park.

As a result of overgrazing, landslides were observed in the National Park in 2016-2017.⁸ Instead of proposing to reduce the number of livestock, however, the authors of the 2017 Adjustment suggest creating sanitary protection zones in the park: "The livestock complexes are proposed to be surrounded by sanitary protection zones, which will be separated from the residential area by hedges of tree and shrub plantings."

The authors are not embarrassed by the fact that livestock complexes exist although they are illegal even in the zone of limited economic activity. According to the law "On Architectural, Urban Planning and Construction Activities in the Republic of Kazakhstan": "Sanitary protection zone is a territory separating ... industrial enterprises and other industrial, municipal and storage facilities in a populated area from nearby residential areas... in order to mitigate the impact of adverse factors."⁹ The Law on SPNTs does not even mention special-purpose zones.

Uncontrolled tourism

Ile-Alatau National Park is visited by a large number of tourists. Exact information on the relationship between organized and unorganized tourism is not publicly available. Thousands of cars



Fig. 4: The accumulation of car tourists on the shore of the Big Almaty Lake began to lead to the formation of a multi-kilometer traffic jam in the park. Big Almaty Canyon.

Photo: Green Salvation

enter the Ile-Alatau NP and move uncontrolled. Food stops and other facilities are built along the main roads.

The lack of effective control over tourists and owners of recreational areas results in numerous violations: cluttering up the territory, making bonfires in prohibited places, cutting down trees, collecting Red List plants, parking cars on river banks, etc. Uncontrolled tourism poses a serious threat to strategic natural resources. Employees of the Hydroelectric Power Station propose establishing an appropriate status for the vital Big Almaty Lake. Cascade management is concerned that the unique lake "may significantly suffer from wild tourism."¹⁰



Fig. 5: Open waste bins are installed throughout the park. They are often crowded and attract not only livestock, but wild birds. Big Almaty Canyon. Photo: Green Salvation

This is confirmed by the words of the Director of the Kazakhstan Tourism Association, R. Shaikenova. At one of press conferences she shared her views on the development of tourism in national parks. "The State Program of (Tourism) Industry Development was launched. Among other things, it includes questions of allocation of land plots, including lands in national parks. The process is very difficult; snatching a piece of land from the Ministry of Agriculture for construction of tourist infrastructure is not an easy task."¹¹



Fig. 6: Abandoned construction vehicles in Butakovka Canyon. Photo: Green Salvation

Conclusion

Developments in Kazakhstan's national parks are anarchic. The country still lacks policies on environment and forests, biodiversity conservation and the development of SPNTs. "There is no single strategic document in the Republic of Kazakhstan that directly provides for the implementation of the Strategic Plan for the Conservation and Sustainable Use of Biodiversity for 2011-2020, and the Aichi Objectives for the conservation and sustainable use of biodiversity."¹²

The Committee for Forestry and Wildlife is not guided by the norms of international conventions, primarily the Convention on Biological Diversity and the World Heritage Convention. Developments in the Ile-Alatau NP are determined by the wishes of the business community such as the primitive use of land for restaurants, saunas, guest houses, ski resorts and even high-voltage power lines, which create additional environmental pressure on the national park. The idea of removal of facilities unrelated to the parks' objectives beyond their borders is not considered at all.

Development is planned without taking into account the ecological capacity of the national park and recreational loads. The chaotic development of the national park leads to the destruction of ecosystems. If these trends continue, the national park will lose the ecosystems for which it was created and will never be included in the World Heritage List.

References

- 1 <http://whc.unesco.org/en/tentativelists/1681/>.
- 2 The law "On Specially Protected Natural Territories," Article 2, paragraph 4: "If an international treaty ratified by the Republic of Kazakhstan establishes rules other than those contained in this Law, then the rules of the international treaty apply."
- 3 Attachment to the reply of the prime-minister dated on December 14, 2018 on the deputy request No.DZ-195 dated on November 15, 2018: <http://www.parlam.kz/ru/mazhilis/question-details/15898> (date of the website visit—May 15, 2019).
- 4 Reply of the Committee for Forestry and Wildlife of April 12, 2019 to the request of the Ecological Society "Green Salvation" No.052.
- 5 Adjustment to the feasibility study of the Ile-Alatau State National Natural Park in the part of the master plan of infrastructure development. "CDZ and GIS "Terra" LLP," approved by the order of the Chairman of the Committee for Forestry and Wildlife dated January 3, 2019, No.17-5-6/1.—Almaty, 2019, pp.54-66.
- 6 Adjustment...—Almaty, 2019, p.15: Thus, conservation zone and ecological stabilization zone currently cover 78,549 hectares of the park territory, or 39.4% of the total area of the park.
- 7 Adjustment...—Almaty, 2019, pp.10-13, 47-51, 53, 93.
- 8 I.I. Kokoreva, I.G. Otradnykh, I.A. Sedina. Anthropogenic impact on natural populations of rare endemic species of the Northern Tien Shan.—Almaty, 2017, p.29.
- 9 Law of the Republic of Kazakhstan dated July 16, 2001, No.242-II "On Architectural, Urban Planning, and Construction Activity in the Republic of Kazakhstan" (with amendments as of April 19, 2019), Article 1, paragraph 47.
- 10 Hydroelectric Power Stations Cascade: strategic facility for life, August 8, 2018:<http://www.ales.kz/ru/my-v-smi/88-2014-god-5/950-kaskad-ges-pozhiznenno-strategi> (date of the website visit—April 15, 2019).
- 11 State support measures for tourism in the Republic of Kazakhstan include issuance of land on the territory of national parks. April 10, 2019: https://kztag.kz/ru/news/mery-gospodderzhki-turizma-v-rk-vklyuchayut-v-sebya-vyachu-zemelnnykh-uchastkov-na-territorii-natspa?utm_source=twitter&utm_medium=cpc (date of the website visit—May 14, 2019).
- 12 Sixth National Report of the Republic of Kazakhstan on Biological Diversity.—Astana, 2018, p.5: <https://www.cbd.int/doc/nr/nr-06/kz-nr-06-ru.pdf>.

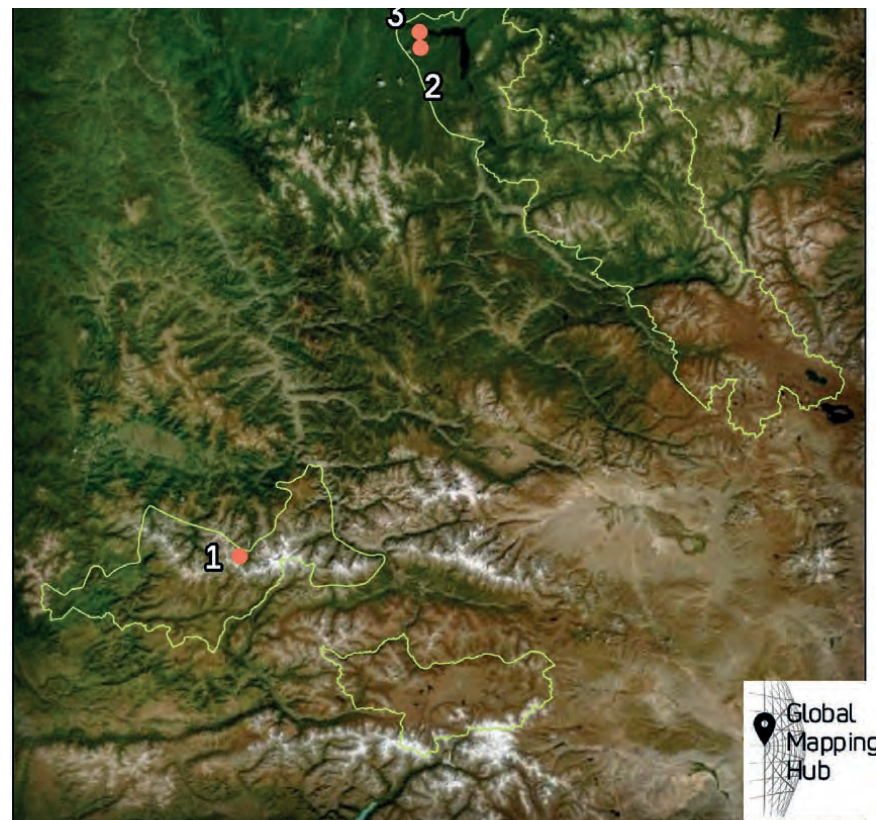
New Threats to the Golden Mountains of Altai World Heritage Property

Mikhail Kreyndlin, Andrey Petrov, Alexandra Tevkina, Greenpeace Russia



In accordance with §118bis of the Operational Guidelines for the Implementation of the World Heritage Convention, notwithstanding Paragraphs 179 and 180 of the Operational Guidelines, State Parties must ensure that Heritage Impact Assessments, and/or Strategic Environmental Assessments be carried out as a pre-requisite for development projects and activities that are planned to be implemented within or around

a World Heritage property. These assessments should serve to identify development alternatives, as well as potential positive and negative impacts on the Outstanding Universal Value of the property and to recommend mitigation measures against degradation or other negative impacts on the cultural or natural heritage within the property or its wider setting. This will ensure the long-term safeguarding of the Outstanding Universal Value, and the strengthening of heritage resilience to disasters and climate change.



In accordance with § 172, the World Heritage Committee invites the State Parties to attend the upcoming World Heritage Watch Convention to inform the Committee, through the Secretariat, of their intention to undertake or to authorize use of a protected area, whereby major restorations or new constructions may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved.

1. Construction of Tourist Complexes in the Buffer Zone of Teletskoye Lake

Active construction of tourist infrastructure is underway on the Teletskoye Lake buffer zone. In recent years a large base, named "Altai Village", has been built with roads and powerlines laid in 2015-2016 (see Fig. 2).

By Decree of the Russian Federal Government, dated December 11, 2017 (No. 2765-r), production of the "Golden Lake" all-season tourist hotspot is planned for the Altai

GOLDEN MOUNTAINS OF ALTAI

- 1 – PRIVATE LAND PLOTS IN THE CLUSTER KATUNSKY ZAPOVEDNIK AND BUFFER ZONE AROUND BELUKHA MOUNTAIN**
- 2 – GOLD MINING AREA IN THE CLUSTER BUFFER ZONE OF TELETSKOYE LAKE**
- 3 – TOURIST INFRASTRUCTURE IN THE CLUSTER BUFFER ZONE OF TELETSKOYE LAKE**

SOURCE: ESRI, DIGITALGLOBE, GEOEYE, EARTHSTAR GEOGRAPHICS, CNES/AIRBUS DS, USDA, USGS, AEROGRIID, IGN, AND THE GIS USER COMMUNITY

Fig. 1: Locations of projects threatening the Outstanding Universal Value of Golden Mountains of Altai.

Map: Global Mapping Hub / Greenpeace



Fig. 2: Boundaries of the "Altai Village" tourist complex.

Map: Global Mapping Hub / Greenpeace

Republic within the Turochaksky municipal district¹. To develop the desired infrastructure of the Golden Lake tourist complex, the signed document transfers land of the forest fund, totaling 17 hectares² to the category of land belonging to protected areas and objects. This change of categorization enables legal use of land for the stated purposes.

In the leased forest areas, BSK Co.Ltd. plans to produce a tourist complex with year-round facilities (including infrastructure) in relation to capital construction projects. This underpins their need for forest land to be recategorized.

This activity was realized without the submission of Environmental Impact Assessments to the World Heritage Centre.

The UNESCO report presented by the Russian authorities in 2019 stated that their planned tourist complex is being built outside the boundaries of the World Heritage property. However, this is not true. The necessary justification of construction was not sent to the UNESCO World Heritage Center. Thereby the World Heritage Committee was unable to assess the potential impact on the Outstanding Universal Values of the property. This violates the Operational Guidelines for the application of the Convention.

2. Gold Mining in the Buffer Zone of Teletskoye Lake

In addition to the above, on 14.08.2017, The Federal Subsoil Resources Management Agency (Rosnedra) of the Siberian Federal District, issued a license for Continent Co.Ltd. to develop

the Maly Kalychak loose gold mining deposit within the buffer zone boundaries of the Teletskoye Lake cluster of the Golden Mountains of Altai World Heritage property. The Maly Kalychak River is a tributary of the Samysh River, which flows into Lake Teletskoye. Thus, the Maly Kalychak gold placer mine is likely to damage Lake Teletskoye (see Fig. 3).



Fig. 3: Gold mining area in the buffer zone of the Lake Teletskoye cluster.

Map: Global Mapping Hub / Greenpeace

The issuance of a license for the development of a gold placer mine within the boundaries of the heritage property poses a threat to its Outstanding Universal Value. Despite repeated requests from the World Heritage Center, the Russian authorities did not provide information on the status of the license, and did not take measures to revoke it.

In the State of Conservation report for 2018, the State Party of Russia reported another gold mining site, which is located outside the boundaries of the World Heritage site.

At the same time, the World Heritage Committee has repeatedly stated that mining is incompatible with World Heritage status.

3. Construction of Tourist Facilities in the "Katunsky Reserve and Buffer Zone of Belukha Mountain."

In the buffer zone territory of the Katunsky Reserve and Belukha Mountain, within in the protected zone of the Belukha Nature Park on Darashkol Lake, several land plots have been transferred to private ownership for the development of recreational infrastructure (see Fig. 4).

On one of the plots a house was built (see Fig. 5 and 6). It was registered as an object of capital construction (which is prohibited by the regime of the nature park).

In response to a Greenpeace claim, the Prosecutor's Office confirmed the illegality of the transfer of land to private ownership. However, whilst also acknowledging the construction of the house on the land, the prosecutor did not recognize this as a violation.

¹ <http://government.ru/docs/30614/>

² cadastral numbers of land plots 04: 03: 090101: 9, 04: 03: 090101: 14, 04: 03: 090101: 25, 04:03 : 090101: 26, 04: 03: 090101: 27, 04: 03: 090101: 28, 04: 03: 090101: 30



Fig. 4: Private land plots in the Katunsky Zapovednik and Buffer Zone around Mt. Belukha.
Map: Global Mapping Hub / Greenpeace

Justification that the house was constructed was not sent to the UNESCO World Heritage Center. Thus, the committee was unable to assess the potential impact on the Outstanding Universal Value of the property, which violates the Operational Guidelines for Convention implementation.

Recommendations for preserving the Golden Mountains of Altai property:

In order to preserve the Outstanding Universal Value of The Golden Mountains of Altai World Heritage property, the following requirements must be met:

1. The Federal State of Russian should submit their plans for tourist infrastructure construction within the buffer zone of Teletskoye Lake to the World Heritage Centre for Environmental Impact Assessment.
2. The State Party of the Russian Federation should abandon the license for gold mining within the property.
3. The Government of the Altai Republic should exclude the Darashkol Lake land plots in the Katunsky Reserve and Belukha Mountain buffer zone from private ownership.



Fig. 5 & 6: Private constructions built on the shore of Lake Darashkol. Photos: Greenpeace

The Ecological Crisis at Lake Baikal is Exacerbated by Poor Governance

Eugene Simonov, Rivers without Boundaries International Coalition
Sukhgerel Dugersuren, Rivers without Boundaries Coalition – Mongolia



Lake Baikal is facing an ecological crisis despite efforts ostensibly directed at safeguarding it. A report on the site's State of Conservation submitted by Russia in late December 2019 has answered only a few of the World Heritage Committee's questions listed in Decision 42 COM 7B.76. The report provides a relevant answer to only one out of 11 specific questions raised by the Committee in 2018. It contains outdated, inaccurate or irrelevant information on four more items: environmental assessment of water-level regulation; measures to control forest fires; development of management planning guidelines for protected areas; and joint strategic assessment of hydropower planned by Mongolia. Russia's report ignores the Committee's requests that pertain to ecological monitoring, forest-management plans, assessment of wildfire impacts on the ecosystem, EIAs for each Special Economic (tourism) Zone planned on lakeshores, assessment of potential impacts of reducing the Water Protection Zone of the lake, and an EIA for remediation of the former Baikal pulp-and-paper mill. The report does not contain any judgment on the overall state of Lake Baikal; neither does it describe prevailing trends.



Fig. 1: Algal bloom in Lake Baikal.

Photo: Andrey Suknev

Russian President Voices Frustration

The real state of affairs was vividly revealed in an Order by the Russian President issued on 12 September 2019. The Order implies that efforts to protect Lake Baikal have largely failed, and calls on the Government to take these urgent measures:

- a) To review Russia's compliance with its commitments to protect Lake Baikal as a World Heritage site and the effectiveness of the Interagency Commission on the Conservation of Lake Baikal. The President ordered a comprehensive improvement of the management system including elevating the Chair of the Commission to vice-prime minister level. We share the President's concerns. Despite establishment of the Department for Protected Areas and Lake Baikal Natural Territory Management by the Ministry of Natural Resources, the actual management of the property has deteriorated. By the end of 2019 it was still unclear which office was in charge of management.
- b) To improve environmental monitoring of the lake's unique ecosystem with special attention given aquatic biota. This is clear recognition that the current monitoring system is almost irrelevant to key environmental matters.
- c) To eliminate impacts of the Baikalsk Pulp and Paper Mill and to rehabilitate the industrial site, for which an international tender process was ordered. After six years of effort this work has yet to begin. The task is urgent: in August 2019 toxic sludge was almost washed into the lake by floods.
- d) To assess the potential impact of tourism on the Baikal Nature Territory and to reduce impacts through legislation. This edict was triggered by haphazard development along the lakeshore. Chinese developers fear, not without reason, that this clause is targeting their operations. However, it is not clear whether this order will trigger investigation of illegal land allocations which have left the lakeshore dotted with private estates. The report to UNESCO mentions that eight such cases were investigated in 2018, but in 2019 more than 150 such violations were identified. There is also a move to exempt those illegally-obtained land plots from strict conservation rules. For example, in 2019 there was a proposal to exclude not just existing settlements from the Pribaikalsky National Park, but also areas of potential expansion, thus fragmenting the park. The National Prosecutor's Office officially backed this move. Meanwhile the Order does not reflect the timely call for limiting tourism to fit the lake's carrying capacity, voiced in June 2019 by the President's Envoy on the Environment.



Fig. 2: Local entrepreneurs in 2019 erected this bust of Putin on Olkhon Island to be able to “complain directly” about “oppression” through enforcement of World Heritage Site regulations. Photo: Novaya Gazeta

Russia’s report to UNESCO is silent on most of the issues identified by the President for the simple reason that little was done to implement his orders of 2017. However, any official who openly admits to this now risks accusations of sabotage. The presidential order also instructs the Prosecutor-General, the Federal Security Bureau and the Interior Minister to check whether government and business have complied with legislation on Lake Baikal. Now the President is directly threatening to use all the might of Russia’s enforcement machine against officials who sabotage protection of the Lake. Whether such incentives will work remains to be seen; in the meantime, the Governor of Irkutsk has resigned and been replaced by a general from the Ministry of Emergencies.

It is doubtful whether these agencies can solve Lake Baikal’s problems. The President could instead have used a more straightforward solution – to declare a state of environmental emergency at Lake Baikal and ask the Committee to inscribe it on the List of World Heritage in Danger. The ecological crisis has begun while inadequate management and governance turn even well-intended efforts into additional risks.

New National Project ‘Ecology’

In January 2019, the Russian Presidential Council on Strategic Planning approved the National Project entitled ‘Ecology’, which included the ‘Preservation of Lake Baikal 2019-2024’. The project replaced its unfortunate precursor ‘Federal Program on Lake Baikal’ which achieved barely 40% of its 66 intended outcomes. The new project contains only five key performance indicators:

1. Decrease discharge of polluted waters on the Baikal Natural Territory by 28.2%;
2. Reduce the area with extremely high pollution-levels by 448 ha;
3. Release 753 million artificially bred fish and larvae of Omul (cisco) and Sturgeon;

4. Build 18 km of new embankments, most of them located within 500 m of the lake;
5. Increase the coverage of monitoring from 75% to 93% of the property.

These indicators do not address key threats and may even cause further harm. Artificially bred fish are unlikely to sustain the diversity native fish fauna. Building embankments may have negative ecological impacts. In addition, the section entitled ‘Legal and Scientific Support’ has two items explicitly weakening protection and potentially causing further harm:

- a) Amending federal law to allow transfer of forest lands to other categories and permit ‘sanitary’ clear-cuts within the World Heritage property.
- b) Amending the law to eliminate some certain environmental regulations applicable to World Heritage sites and other conservation areas. There is a vague promise that regulations that are ‘still needed’ will be redeveloped from 2020, but the low quality of environmental governance in Russia leaves little hope for an improvement.

Norms for Allowable Impacts on Lake Baikal

In March 2019, the Ministry published ‘for consultation’ a draft text proposing to increase concentrations of pollutants allowed to be dumped in the property. Scientists and NGOs publicly condemned the draft, but officials insisted that this measure was needed to ensure the timely spending on new wastewater treatment plants. The regulations of 2010 set very strict limits on the concentration of pollutants in wastewater released into Baikal and its tributaries. Authorities lamented that such limits were unachievable while scientists argued they were not strict enough to prevent eutrophication of the lake.

The ensuing public debate resulted in a working group consisting of the Siberian Branch of the Academy of Science, wastewater businesses, and officials. They developed a compromise which set tough rules for discharges directly into the lake (with no discharges at all permitted in its water-protection zone), but weakened standards for releases into its tributaries. This was ostensibly to pave the way for the construction of wastewater treatment plants. The new draft is based on the assumption that any amount of wastewater may be dumped into the lake basin as long as concentrations are below the adopted threshold. These standards will be again subjected to public consultation in early 2020.

Leading experts say that this compromise lacks scientific justification. Eutrophication and the replacement of native species by invasive organisms are known to occur near the mouths of tributaries that receive wastewater even when measurements do not show an increase in concentrations of pollutants. Scientists argue that, in addition to controlling concentrations, it is also necessary to limit the overall amount of pollutants. These

concerns show that the measures included in the National Project may not be beneficial for the well-being of the lake and are not part of a well-designed management plan for the property. We request that the Committee require Russia to undertake an EIA both for the new draft 'Norms of Allowable Impacts on Lake Baikal' and on the Lake Baikal sub-project of the National Project 'Ecology'.

Assessment of proposed hydropower impacts on Lake Baikal

In Mongolia, the World Bank's MINIS Project published its 'Final Terms of Reference on Regional Environmental Assessment of Flow Regulation of Orkhon River and Shuren Hydropower Plant projects' (REA ToR). They exclude consideration of alternatives – a corruption of the principles of assessment. Nor do they give an equal role to Russia, thereby contradicting the requirements of the Committee for a transboundary SEA. On December 31, 2019 the MINIS Project was closed and therefore the World Bank will not oversee the REA.

Meanwhile, an 'Agreement for Cooperation in the Electricity Sector' signed between Russia and Mongolia in December 2019 includes environmental safeguards, making new hydropower dams in Mongolia unnecessary. Any fair assessment of alternatives would now show that wind and solar generation would be a more cost-effective solution for Mongolia than hydropower on rivers with highly variable flows discharging into the Lake Baikal. Nevertheless, Mongolia is still proceeding with its EIA for the Egiin Gol Hydro without the involvement of Russia or NGOs, and no public information on its contents or the process for assessment. This violates accepted standards for World Heritage impact assessment and ignores previous WH Committee Decisions. Russia's state-of-conservation report fails to present these facts.

Similarly, the 2019 report rephrases the same unsatisfactory explanations pertaining to Lake Baikal's water levels as were submitted to UNESCO in 2018 and which triggered the Committee's urgent request for a comprehensive EIA on this issue. Russia refused to undertake such an EIA, thereby endangering Lake Baikal. Historically the worst impacts arising from artificial regulation of water levels have occurred when high levels have caused erosion of the lakeshore and islands.

Given the ecological degradation and problems faced by Lake Baikal (such as the lack of an effective management system), we recommend that the Committee warns Russia that Lake Baikal will be inscribed on the 'Heritage in Danger List' at its 45th Session, unless the State Party undertakes to prepare a comprehensive management plan to confront the crisis, strengthen environmental regulations, and address the issues raised by the Committee. Such a decision would match the spirit of the order issued by the Russian President.



Fig. 3: Heaps of rotting algae are now found almost at any lakeshore settlement that releases wastewater.

Photo: Vladimir Petrov

References

- 1 Lake Baikal World Heritage – a Victim of Climate Change and Hydropower. Pages 54-58. In Eugene Simonov and Stephan Dompke (editors) *Heritage Dammed: Water Infrastructure Impacts on World Heritage Sites and Free Flowing Rivers*. Civil Society Report to the UNESCO World Heritage Committee and Parties of the World Heritage Convention. Moscow 2019; Rivers without Boundaries and World Heritage Watch. 132 pages. ISBN: 978-5-4465-2345-0
- 2 Decision 42COM 7B.76 <https://whc.unesco.org/en/decisions/7305>
- 3 President's web-site, September 12, 2019. <http://en.kremlin.ru/acts/news/61526>
- 4 Many WH Committee decisions called for development of management plan e.g. Decision: 38 COM 7B.76.
- 5 WHC Decision 41 COM 7B.6 and 42COM 7B.76 on monitoring
- 6 O.A. Timoshkin <https://irk.today/2019/12/11/uchenyj-so-ran-u-bajkala-nalico-vse-priznaki-bolezni/> (contains comprehensive list of scientific sources with evidence and characteristics of ecological crisis)
- 7 Closure of the mill and site rehab has been subject to at least 10 WHC Decisions.
- 8 <https://blogs.agu.org/landslideblog/2019/07/30/baikalsk-1/> and Stupin, V.P. et al 2018. System of geo-information mapping of debris flows hazard in the southern Baikal region. IOP Conference Series: Earth and Environmental Science 194 102002.
- 9 <https://www.scmp.com/news/china/diplomacy/article/3029729/russia-acts-protect-lake-baikal-amid-anger-moscow-concerns>
- 10 <https://www.themoscowtimes.com/2019/09/05/giant-putin-bust-unveiled-near-lake-baikal-a67171>
- 11 <http://www.transrivers.org/2019/2587/>
- 12 <https://www.themoscowtimes.com/2019/06/26/russia-will-restrict-lake-baikal-tourism-putin-aide-says-a66163>
- 13 http://audit.gov.ru/press_center/news/35228
- 14 Article 11 of Federal Law of May 1, 1999 No. 94
- 15 Decree of the Government #643 (30 August, 2001) on 'The List of Activities Prohibited in the Central Ecological Zone of the Baikal Natural Territory'
- 16 <https://regulation.gov.ru/projects/List/#departments=14&npa=88105>
- 17 O.A. Timoshkin <https://irk.today/2019/12/11/uchenyj-so-ran-u-bajkala-nalico-vse-priznaki-bolezni/>
- 18 <https://www.worldbank.org/en/country/mongolia/brief/mongolia-mining-infrastructure-investment-support-project>
- 19 <http://publication.pravo.gov.ru/DocumentView/0001201912040002>
- 20 <http://www.transrivers.org/2019/2572/>
- 21 Decisions 41 COM 7B.6 on Egiin Gol assessments
- 22 2018 State of conservation report by the State Party <https://whc.unesco.org/document/165638>

Volcanoes of Kamchatka: Impending Threats for its Pristine Beauty

Irina Panteleeva, Mikhail Kreyndlin, Alexandra Tevkina, Greenpeace Russia
Anastasia Martynova, ICOMOS Russia



The “Volcanoes of Kamchatka” UNESCO World Heritage Site was established on December 6, 1996. It includes six specially protected natural areas, located in the Kamchatka Territory. The protected areas include; the Kronotsky State Natural Biosphere Reserve, the South Kamchatka Wildlife Reserve of federal significance, and Natural Parks “Nalychevo”, “Bystrinsky”, “Kluchevskoy”, and “South Kamchatka”.

The Kamchatka Volcanoes are one of the most outstanding volcanic regions in the world with a large number of diverse active volcanoes with a wide range of volcanic activity. The location of the Kamchatka Peninsula between the large continental mass and the Pacific Ocean determines its unique features, expressed by continuous volcanic activity and the ongoing resettlement of various species of plants and animals. The region of the Kamchatka Volcanoes is characterized by a large diversity of Palearctic flora, including numerous endangered plant species and at least 16 endemic species. Within the boundaries of the property live 33 species of mammals as well as 145 species of birds. This UNESCO property is of exceptional value to the world community according to criteria (vii, viii, ix and x).

Since last year two natural areas of the site, the Kronotsky Nature Biosphere Reserve and the South Kamchatka Regional Nature Park, have been deemed at risk.

The fish passage in the Kronotsky Nature Reserve

The largest lake of Kamchatka, Lake Kronotskoye, is located in the central part of the Kronotsky Nature Biosphere Reserve. The lake is unique due to its natural composition, including Kokani populations (living form of sockeye salmon), which have evolved from the migratory sockeye salmon as a result of its long-term isolation. While the area and depth of the lake allowed a huge population of migratory sockeye salmon to spawn, the Kronotskaya River flowing out of the lake in the upper reaches form steep rapids that are impassable for fish.

Creating an artificial herd of migratory sockeye salmon in the basin of Lake Kronotskoye is a tempting idea for large fishing companies. Different technical variants of this idea were de-



Fig. 1: Meteorology Creek flowing into Lake Kronotskoye.

Photo: AirPano.com

veloped in the 1950–1980s, but were not implemented. At the end of 2018, another attempt was made to start the development of the Kronotsky fish passage project (see Fig. 2).



Fig. 2: Map of the planned fish passage.

Map: Global Mapping Hub / Greenpeace

In December 2018, the Ministry of Natural Resources and Environment of the Russian Federation held a meeting initiated by the Governor of the Kamchatka Region at the request of

fishing businessmen, who were considering the use of Lake Kronotskoye for industrial fishing purposes. Representatives of scientific organizations and the Ministry of Natural Resources expressed an unequivocal negative attitude to this initiative. Nevertheless, it was decided at the meeting “to explore the theoretical side of the project”¹.

Later the Governor of the Kamchatka Region publicly made a statement against the construction of a fish channel². However, in February 2019, Daria Panicheva, the Head of the Scientific Department of the Kronotsky Nature Reserve, was detained. She was strongly opposed to this project and was engaged in the preparation of scientific justifications against the construction of the proposed fish passage. The court placed her under house arrest, which was only lifted in August³. Staff members of the Kronotsky Nature Park associated the arrest with Panicheva’s position on the construction of the fish channel.

The use of Lake Kronotskoye for industrial purposes will lead to significant changes of the present ichthyofauna and will entail the withdrawal of the central region of the reserve from the specially protected natural area. This in turn will inevitably lead to the degradation of the unique natural complexes within the region that are under UNESCO protection.

A resort in the South Kamchatka Nature Park

At a session of the Legislative Assembly in October 2019, amendments to the regional law “On specially protected natural areas of Kamchatka Territory” were approved. Changes will be made to Art. 6 of the law which will enable the authorized body of the regional government to issue amendment permissions within the protected areas. Alterations are also planned for Art. 8, which is to be supplemented by several specifications. One of these specifications will focus on a regulation which maintains that any protected area must follow the permitted construction and reconstruction guidelines of capital construction projects. The regional Ministry of Nature will be responsible for issuing permits for capital construction in Kamchatka’s reserves and nature parks. Environmentalists, activists and the press oppose the adoption of amendments to the local law. Thanks to the present construction in the biosphere reserve, a corner of Kamchatka’s pristine beauty could be irreparably damaged.

In 2019 the “creation of an international standard resort (“Three Volcanoes Park”), including all the relevant infrastructure surrounding the volcanoes Mutnovskiy, Vilyuchinsky and Gorely” was initiated in the Kamchatka Territory. The authorities of

Kamchatka were instructed to prepare the approval of blueprints for the “exclusion of the “Kamchatka Volcanoes” area out of the protected boundary areas of the region as well as the boundaries of the UNESCO sites by the end of September/October 2019. This project poses a direct threat to the World Heritage site as it implies intensive use of the territories within the boundaries of the property.

There is also a plan for the construction of the «Three Volcanoes» resort by 2027 with a total investment of about 39.2 billion rubles. “Three Volcanoes Park” is a large-scale project that combines ski, mountain and cruise tourism within a territory of 280 sq. km⁴. It is proposed that the construction of ski infrastructure, hotel and tourist facilities, a tourist camp, eco camps, as well as a network of roads and a seaport are to be completed by 2028. According to the plan, the resort will include hotels with 1,000 rooms, 17 km of ski slopes and two cable cars. According to the Chairman of the Board of Directors of Three Volcanoes Park LLC, the Park will be visited by more than 400,000 people annually⁵.



Fig. 3: Vilyuchinsky volcano would be excluded almost entirely from the South Kamchatka Regional Nature Park. Photo: Earthporn.com

Construction is planned in the area of the Vilyuchinsky, Mutnovsky and Gorely volcanoes. Two protected areas culminate in this region: the “Caldera of Gorely Volcano” and the “rare landscapes of Vilyuchinsky volcano”. The project is planned to be implemented on a public-private partnership basis.

A significant part of the project is planned to be implemented within the territory of the South Kamchatka Regional Nature Park. This region is a part of the Volcanoes of Kamchatka UNESCO World Heritage property. This territory is the section of the northern cluster of the nature park from the top of the Vilyuchinsky volcano to the Pacific coast.

Construction in the Park is not consistent with the restrictions imposed by the status of a protected area. For this reason, the

1 <https://www.kommersant.ru/doc/3875955>

2 <https://www.kam24.ru/news/main/20190307/67114.html>

3 <https://kamchatinfo.com/news/society/detail/32654/>

4 <http://government.ru/news/36555/>

5 https://www.russiatourism.ru/news/16355/?sphrase_id=513404

Government of the Kamchatka Territory intends to withdraw more than 150 sq. km⁶ from the protected area and simultaneously intends to exclude it from UNESCO World Heritage property (see Fig. 4).



Fig. 4: The area to be excluded from the South Kamchatka Regional Nature Park.
Map: Global Mapping Hub / Greenpeace

The legal ground for such decisions has been created by amendments to the regional law “On specially protected natural areas of Kamchatka Territory”, which were adopted in September 2019. These amendments permit the exclusion of lands from protected areas for a number of reasons.

On 15 November 2019, the interagency working group responsible for taking decisions on the functioning and development of the regional protected areas in the Kamchatka Territory approved documents justifying the exclusion of the considered area from the territory of the South Kamchatka Regional Nature Park. The reason for the decision was as follows: “Exclusion from specially protected natural areas of regional significance sites, which contain natural systems and (or) objects with implemented protection measures, is possible without keeping to the regime of specially protected natural areas of regional significance in accordance with federal law”.

The excluded territory is the habitat for a number of rare and endemic species of animals and plants listed in the ‘Red Data Book’ of the Russian Federation and the Kamchatka Territory. Obviously, large-scale tourism in this territory will not be able to preserve the biodiversity of the area nor its unique natural complexity and its landscapes.

The draft regulation of the natural park with the new borders had to be sent for approval to the Ministry of Natural Resources and Environment of the Russian Federation by December 25, 2019. At the same time, efforts are being made to exclude the territory from the UNESCO World Heritage property. According to media reports, the Ministry of Natural Resources and Environment of the Russian Federation has already sent a notification to UNESCO about changing the boundaries of the Nature Park⁷.

To compensate for the excluded territory, the Government of the Kamchatka Territory plans to exchange the “Caldera of Gorely Volcano”, a natural monument of regional significance, together with the adjacent land into the boundaries of the South Kamchatka Nature Park. However, such actions should not be treated as a compensation for the exclusion of areas because the ‘Caldera of Gorely Volcano’ is already a specially protected area of regional significance, therefore the area of nature protection territories will not increase. Moreover, the current regime of the “Caldera of Gorely Volcano” is stricter than the regime of the South Kamchatka Nature Park.

Thus, the ongoing changes in the boundaries of the South Kamchatka Nature Park can be estimated as a significant threat to the territory. A territory which was included in the World Heritage site due to its unique natural value!

Recommendations for the preservation of the World Heritage Volcanoes of Kamchatka property:

In order to preserve the outstanding universal value of The Volcanoes of Kamchatka World Heritage property it is required that:

1. The Government of the Kamchatka Region should abandon the idea of constructing a fish passage in Lake Kronotskoye.
2. The Government of the Kamchatka Region should abandon the plan to exclude the territory from the South Kamchatka Regional Nature Park.
3. The Government of the Kamchatka Region should develop an alternative option for the implementation of the “Three Volcanoes Park” investment project on a territory which is not a specially protected natural area.
4. The UNESCO World Heritage Committee should refuse to approve the change of the boundaries of the Volcanoes of Kamchatka World Heritage property.

⁶ <https://www.kamgov.ru/minprir/collegial-body/docs?id=804>

⁷ <https://www.kommersant.ru/doc/4143378>

Tanzania: Selous Game Reserve ... losing its status?

Günter Wippel, uranium network

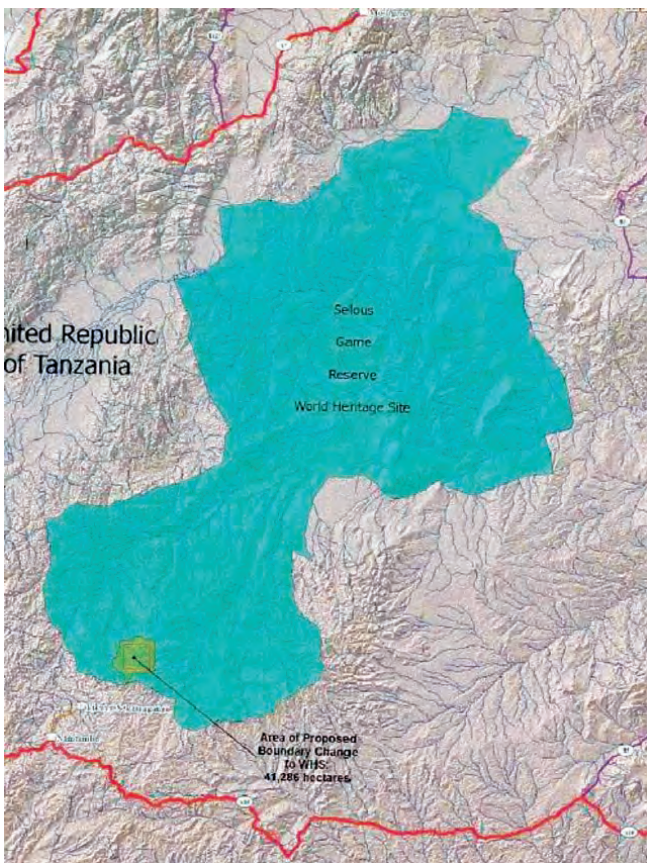


Fig. 1: The former Selous Game Reserve World Heritage Site.³ Map: UNESCO WHC

In 2014, the World Heritage Committee had placed Tanzania's World Heritage property Selous Game Reserve (SGR) on the list of sites in Danger¹ and retained it as endangered since, confirmed by its 2019 decision.

In June 2019, Tanzania's President Magafuli ordered the splitting of one of the largest World Heritage sites in Africa, Selous Game Reserve (SGR) into two parts, following the decision to build a large Hydro dam at Stiegler's Gorge, now referred to as the *Rufiji Hydropower project (RHPP)*, in a key area of SGR.²

On 9 November 2019, Magafuli proclaimed a 'new' National Park – in the area of Selous Game Reserve, to be named Julius Nyerere National Park, with approx. 30.893 sqkm, whereas the former SGR WHS is approx. 51,200 sqkm. (Government Notice No. 923 published on 29/11/2019). The new park covers the entire northwestern and southern parts of the former Selous Game Reserve, and its eastern border will run through the middle of the RHPP (see Fig. 1 and 2).



Fig. 2: Nyerere National Park.

Map: Government Proclamation 29. Nov. 2019

According to Magafuli's will, the National Park shall generate substantial income through tourism. The remaining part of SGR is expected to be used as a hunting reserve.⁴

IUCN says Selous Game Reserve is in danger of losing its status as a World Heritage site "if plans to build the Stiegler's Gorge dam go ahead."⁵

1 Update of the List of World Heritage in Danger, 43 COM 8C.2 <https://whc.unesco.org/en/decisions/7373>

2 "Tanzania to split Selous Game Reserve and establish new national park" www.tourismupdate.co.za/article/193843/Tanzania-to-split-Selous-Game-Reserve-and-establish-new-national-park (30 Jul 2019)

3 https://whc.unesco.org/en/list/199/multiple=1&unique_number=1924

4 'Make upper part of Selous Game Reserve a National Park' – Magafuli <https://www.busiweek.com/make-upper-part-of-selous-game-reserve-a-national-park-magafuli/>

5 Selous reserve could lose World Heritage status if dam project goes ahead, IUCN, 27. June 2019 www.iucn.org/news/iucn-43whc/201906/selous-reserve-could-lose-world-heritage-status-if-dam-project-goes-ahead-iucn.

Losing the status of a World Heritage site is no easy matter: only twice in history have World Heritage Site been delisted.⁶

A joint WHC/IUCN Mission to the area needs to evaluate the situation. Then, the formal decision to delist – or not – will be made by the WH Committee at the next WHC session. For 2020, the WHC session has been postponed due to the Covid-19 pandemic.

The WHC urged the Government of Tanzania to invite a mission [Decision 43 COM 7A.16, No. 9]. In its State of Conservation Report, dated 30 January 2020, submitted to the UNESCO WHCenter, the Government of Tanzania states in regard to the SGR WHS:

“On the other hand, considering the fact that all necessary information and logistical arrangement are not in place, the State Party requests the postponement of the invitation of a joint World Heritage Centre / IUCN Reactive Monitoring Mission to the property until when all necessary logistics are in place.”⁷

Given the fact that plans to build Stiegler’s Gorge Dam (now referred to as RHPP – Rufiji Hydro Power Project) had been announced by the Government of Tanzania for a number of years, the plans to split up SGR WHS were ordered by Magafuli in June 2019, and the Government Proclamation of Nov 2019, including a detailed map of a “Nyerere National Park”, and considering that the government of Tanzania has so far ignored all concerns of the WHC regarding Stiegler’s Gorge dam, this request has to be seen as a delaying tactics.

Another danger to the area of the SGR – and probably a background reason to split up the SGR, with probably all of the area losing World Heritage status protection – are mineral resources in the area: Currently, uranium, graphite and gemstones are explored. Some years ago, dozens of exploration licenses had been granted inside the SGR WHS.

The World Heritage status of the area and the fact that the 2012 decision to allow excision of an area for a uranium mine had been stamped “unique and extraordinary” make it practically impossible to allow another exception for mining in the World Heritage Site.

In case the SGR World Heritage Site would lose its status, nearly 40% of the former SGR WHS (20,300 sqkm) would remain a Game Reserve under Tanzanian law, with no World Heritage protection.

6 World Heritage List – delisted sites <http://whc.unesco.org/en/list/?error=forgotlogin&order=property&delisted=1&mode=list>

7 <http://whc.unesco.org/document/180507>

In 2013, IUCN stated in its Mission Report:

“The Wildlife Conservation Act (WCA) (...) The 2009 amendment includes an important modification, which is the explicit permission of prospecting for and mining of oil, gas or uranium in game reserves under defined conditions, notwithstanding the continued general prohibition of prospecting and mining in game reserves.”⁸ (underline added)

Thus, 40% of the SGR area, some 20,300 sqkm would basically be open to all kinds of resource exploitation. Conveniently, this area would be adjacent to Stiegler’s Gorge Dam and close to electricity produced by the dam; industrial development of the area might follow, making it unsuitable for wildlife.

The continuing threat of uranium mining

In 2012, an area around Mkuju River uranium deposit had been excised from the World Heritage site. In 2017, ROSATOM, the owner of the project, had announced an “at least three year” postponement of the project due to the depressed price of uranium.⁹ The price of uranium has not recovered ever since.

European involvement ...

In 2013, after unsatisfactory comments of the IAEA on Tanzania’s legislation in nuclear matters, the Tanzanian energy minister of the time made a visit to Brussels and requested support. Later the same year, members of the European Commission Nuclear Safety Programme visited Tanzania.

By 2016, the European Union had created, via the European Commission, PROJECT MC5.01/15B – SUPPORT TO SOUTHERN AFRICAN STATES IN NUCLEAR SAFETY AND SAFEGUARDS.¹⁰

With the support of the European Union and its ‘Nuclear Safety Programm’, Tanzania advanced its laws and regulations in nuclear matters. Tanzania Atomic Energy Commission (TAEC), was furnished with radiation monitoring equipment – bringing Tanzania closer to the ability to exploit uranium.

Within the UN Economic Commission for Europe (UNECE) there is also activity in regard to uranium: UNECE published in its “Energy Series” Reports No. 46, 49, 55 and finally No. 57 “**Redesigning the Uranium Resource Pathway**”¹¹, ending up by defining uranium as a potential source for sustainable development,

8 Mission Report, Reactive Monitoring Mission Selous Game Reserve (United Republic of Tanzania), 02 - 11 December 2013, <https://whc.unesco.org/en/documents/129161>, underlining not in the original

9 Russian state corporation suspends \$1.2 billion uranium project in Tanzania (July 7, 2017) www.mining.com/russian-state-corporation-suspends-1-2-billion-uranium-project-tanzania/

10 PROJECT MC5.01/15B - SUPPORT TO SOUTHERN AFRICAN STATES IN NUCLEAR SAFETY AND SAFEGUARDS <https://www.sadcproject.istc.int/page/our-project>

11 UNECE Energy Series No. 57 Redesigning the Uranium Resource Pathway www.unece.org/fileadmin/DAM/energy/se/pdfs/UNFC/pub/E_ECE_ENERGY_124.pdf

claiming uranium could be mined and handled in a ‘sustainable’ way.

... and the Mkuju River Uranium Project.

Amazingly, the UNECE Report No 57 names Mkuju River Uranium Project explicitly and solely as a source of uranium – and in-situ-leaching as the method of choice for exploiting it¹², the method considered by MRP’s owners. No other uranium deposit in the world is mentioned.

More surprising, UNECE Report No. 57 claims (page 65, 3rd paragraph):

“So, when at the end of life, the Mjuku River project site was returned to within the boundaries of the Selous National Park it would be hard or impossible to tell there had been a mine at all.”

The statement is in stark contrast to expert findings on in-situ leaching. The U.S. Geological Service concluded: “To date, no remediation of an ISR operation in the United States has successfully returned the aquifer to baseline conditions.”¹³

Another expert review states: “The experience of acid ISL uranium mining in areas controlled by the former Soviet Union provides a stark contrast to experiences in America and Australia. In most applications of the technique, there have been extreme occurrences of groundwater contamination. At some sites, this contamination has migrated considerable distances to impact on potable drinking water supplies.”¹⁴

The real reason for changing to ISL is given in a UraniumOne presentation: Capital expenditures (CAPEX) and operational expenditures (OPEX) are lower with ISL. The company advertises the same advantages of ISL on its website.¹⁵

Mining by in-situ leaching (ISL) is advertised as “environmentally friendly”, however, the president of the Uranium One-Group, subsidiary of Russia’s ROSATOM, states the real reason for the change to ISL: commercial efficiency – not environmental friendliness.

“Taking into account the world’s low prices for natural uranium, our company has been implementing a number of measures to increase commercial efficiency of all mining operations, including our Mkuju River Project in Tanzania,” – Vasily Konstantinov, the President of JSC “U1 Group” noted.

“If we establish that it is feasible to arrange a commercially viable uranium production using ISL technology, our company will be able to make a decision to mine the deposit by combining two production methods, i.e. conventional mining and ISL. This would be a one-of-a-kind experiment as ISL production has never been previously combined with other methods at a single deposit elsewhere in the world.”¹⁶

In reality, both risks – those from ISL and those from open-pit-mining and its tailings and tailings ponds, would be brought to the vicinity of SGR WHS– meaning double trouble for the area.

¹² Ibid, page 62 – 64

¹³ J.K. Otton, S. Hall: In-situ recovery uranium mining in the United States: Overview of production and remediation issues, International Symposium on Uranium Raw Material for the Nuclear Fuel Cycle: Exploration, Mining, Production, Supply and Demand, Economics and Environmental Issues, 2009, page 129

¹⁴ *Critical review of acid in situ leach uranium mining: 2. Soviet Block and Asia*, in Mudd, G.M. *Env Geol* (2001) 41: 404. <https://doi.org/10.1007/s002540100405>, (underlining not in the original)

¹⁵ UraniumOne website > http://www.uranium1.com/clean-energy/#isr_mining

¹⁶ UraniumOne website > Uranium One Group examines applicability of ISL technology at Mkuju River Project in Tanzania <http://www.uranium1.com/news/news/uranium-one-examines-applicability-of-isl-technology-at-mkuju-river-project-in-tanzania/>

The Hubli-Ankola Rail Line – A Threat to the Western Ghats Harbours the Inscribed Natural World Heritage Properties in India

Shaju Thomas, Tropical Institute of Ecological Sciences



The Western Ghats of India, one of the 35 global hotspots of biodiversity, has been recognized by UNESCO as a Natural World Heritage Site (NWHS) on the 36th session of the World Heritage Committee (WHCom.) in St. Petersburg (Russia) from 24th June to 6th July 2012. The nomination process and the accompanying deliberations took almost three years (2009-2012), and volumes of correspondence had been carried out between the Ministry of Environment, Forest and Climate Change (MoEF&CC), Government of India, UNESCO and IUCN, which showed the intricate mechanism in the tagging process.

The Western Ghats is an undulating mountain chain and water tower of peninsular India. It extends over 1,600 km through six States – Gujarat, Maharashtra, Goa, Karnataka, Tamilnadu and Kerala – spread over 140,000 km² and supporting (more than) 300 million people. This extensive landscape is bio-culturally very rich. To quote the WH Committee: “Older than the Himalaya mountains, the mountain chain of the Western Ghats represents geomorphic features of immense importance with unique biophysical and ecological processes. ... It is an “Evolutionary Ecotone” illustrating “Out of Africa” and “Out of Asia” hypotheses on species dispersal and vicariance”.



Fig. 1: The Western Ghats.

Photo: www.amoghavarsha.com

The Western Ghats has global importance due to its species richness and endemism. This landscape has Outstanding Universal Value (OUV) fulfilling two major criteria as per the Operational Guidelines of the World Heritage Convention (WHC) to accord acceptance as a NWHS. The WH Committee inscribed the property, which is made up of 39 component parts grouped

into 7 sub-clusters spread over 7953.15 sq.km, and justified the serial approach in principle from a biodiversity perspective because all 39 components belong to the same bio-geographic province and remain as isolated remnants of previously contiguous forest. These components spread across four states viz; Kerala, Tamilnadu, Karnataka, and Maharashtra. The planned Hubli – Ankola Rail Line would cut across the Karnataka part of the Western Ghats.



Fig. 2: The planned Hubli-Ankola Railway Line would dissect the Western Ghats at a point where a gap in the chain of World Heritage clusters exists.

Map: <https://beingbelgaumite.in/> / https://whc.unesco.org/en/list/1342/multiple=1&unique_number=1921/ Stephan Doempke

The History and Legality of the Rail line

The Ministry of Railways of the Government of India sanctioned the Hubli-Ankola Rail line in 1997-98, accepting the repeated request of the Karnataka State Government for easing the bulk transport of iron and manganese ore from the mining sites in the Bellary region to the coast, and for the social and the eco-

conomic development of the Dharwad and Uttara Kannada districts. After more than two decades of delay due to both legal and administrative issues, on the 21st of March 2020 - coinciding with the World Forest Day and defeating its spirit in every sense - the Karnataka Government has decided to go ahead with the Hubli-Ankola Rail Line Project, which will destroy large patches of forest of the Western Ghats.

The foundation stone of the project was laid in 2000, by the then Prime Minister of India, even before the approval of the conversion of forest land for non-forest purpose as per the Forest Conservation Act of 1980. While the construction was in progress in the non-forest area, the violations of the laws and the ecological damage due to the project was brought to the notice of the Central Empowered Committee (CEC), a monitoring committee constituted in 2002 by the Supreme Court (SC) of India to look into forest-related matters by conservation NGOs, in 2006. The litigation resulted in the appointment of several expert committees by the concerned authorities both at the national and state level and independent groups.

The CEC in its final report in August 2015 to the Supreme Court citing several studies including one by the Indian Institute of Science (IISc), Bangalore, clearly pointed out the ecological damage to the forest ecosystem by the railway line. To quote, “No amount of mitigative measures would be adequate to contain the severe adverse impact of the project on the biodiversity-rich dense forest of Western Ghats and ecology within reasonable limits. Therefore, the proposal for diversion of forest land, rejected on merit by the MoEF under the Forest (Conservation) Act of 1980 on ecological and environmental considerations, should not now be reviewed or approved”.



Fig. 3: The dense forest of the Kali River plain. Photo: Amoghavarsha/wikimedia

In order to expedite the legal process the Supreme Court transferred the case to the National Green Tribunal (NGT) in October 2015. The NGT on 10th February 2016 approved the “liberty of the Project proponent” that is the Indian Railways to submit the proposal to the state government seeking permission to the forest for non-forest use as stipulated under the Forest Conservation Act of 1980. This order was not a green signal to proceed with the project as it has several legal checks and measures to overcome, to get final approval. The State Govern-

ment, using the loopholes in the legal provisions in connivance with the State Board of Wildlife (KSBWL) and The Regional Empowered Committee (REC) of the MoEF&CC to fulfill its developmental aspirations, decided to give approval of the Proposal in March 2020.

Ecological Issues of the Hubli - Ankola Rail Line

This rail line is slated to run from Hubli in Dharwad district to Ankola in Uttara Kannada district over a distance of 168 km. The total land required for the project is 1384.40 ha, out of which 965 ha is forest, which has been over the years reduced to 595.6 ha of reserve forest in the two districts. It cuts through three biodiversity “hot-specks” of the Western Ghats – the Anshi-Dandeli Hornbill Conservation Reserve, the Kali Tiger Reserve and the Bedthi Conservation Reserve – and Elephant Corridors.



Fig. 4: The Hubli-Ankola Railway Line could have detrimental impacts on the tiger population in the Kali Tiger Reserve. Photo: www.india-tigers.com

In addition, the Railways anticipate a felling of 178,000 to 220,000 trees. The line passes through a variety of landscapes and different types of forest, including evergreen, semi-evergreen, moist deciduous and dry deciduous with high tree density. Definitely, the numbers of trees to be cut are grossly underestimated considering the high canopy density along the kilometre-long track of the rail line. An expert committee appointed by the National Tiger Conservation Authority (NTCA), after a rapid field study, submitted its report, to quote, “the overall floristic diversity comprises 43 families, 106 genera and 134 of trees and 58 families 128 genera and 146 of woody ground flora of shrubs and regenerating tree stocks. The fauna represented by 29 species of mammals, 256 species of birds and several species of other taxa. The major species identified in the project area include tiger, leopard, sloth bear, gaur, sambar, chital, mouse deer, common giant flying squirrel, Malayan giant squirrel, Indian giant squirrel, striped hyena, jackal, common wolf, Indian fox, Indian porcupine, common mongoose, small Indian mongoose, hare, common langur, and Indian pangolin, among others. Majority of mammals belong to IUCN Red List and most of them are protected under the Wild life Protection Act, 1972”.

The committee expressed its apprehension that the railway line could be a leading cause of wildlife mortality as it intersects with the elephant movement corridor. Another important issue is undermining the “Project Tiger” a major conservation programme by the Government of India started in 1972 to conserve the endangered tigers and its habitat. Recent studies by various experts highlighted the need for maintaining connectivity of isolated tiger populations for their future survival. The proposed rail line will fragment the forest ecosystem of the Western Ghats and pose a serious threat to the survival of the big cats and mega-herbivores, and also increases man-animal conflict in the future.

In view of the fact that the Western Ghats’ 7 clusters and 39 component areas lie far apart from each other, great attention was placed on their connectivity when India’s World Heritage nomination was considered. The nomination file repeatedly states in words and maps that the Western Ghats in their entirety as a contingent area provide for this connectivity. It is obvious that a linear structure dissecting the Western Ghats on their entire width must have a serious negative impact on such connectivity, possibly putting into question the integrity of the World Heritage Site as a whole. In addition a view on the map reveals that the chain of protected areas which make up the Western Ghats World Heritage Site has a gap in its central part. It remains unclear why no protected area has been included in the WHS when the Kali Tiger Reserve, the Anshi-Dandeli Hornbill Conservation Reserve, the Bedthi Conservation Reserve and Elephant corridors could fill that gap. A railway line would forever close that option.

What lies ahead?

It is not only the NTCA, but also the CEC, the National Board of Wildlife (NBW) and several other agencies have already rejected the proposal citing severe damage to the complex and fragile Western Ghats biodiversity hotspot by anthropogenic activities. The rail line, should it materialize, is not going to serve the purpose of bulk transport of the minerals and metals due to Supreme Court restrictions on mining and a projected decline in mining activity in the area. An Asian Development Bank (ADB) funded road is available in the area, which is underutilized for vehicular transport. The widening of the road also has its impact on the Ghats forest ecosystem.

Definitely, we need development, but not at the cost of severe environmental damage and loss of natural capital. As the Government of India has a surfeit of laws and rules for conservation and protection of nature and the people at large have a long tradition of reverence to mother earth, the decision by the Karnataka government to go ahead with the project fragmenting the Western Ghats is against the letter and spirit of Indian ethos.

Moreover, the country is experiencing climate change related recurring natural calamities and health related issues. Hence, the need of the hour is to conserve as much natural areas intact for the future of the country and the benefit of the citizens. It is high time to think about the sustainability of developmental projects. Citizens’ voices and legal measures are the only hope to circumvent this assault on nature. The conservation NGOs are planning to continue the legal battle and campaign against the project. But, we need collective voices from across the globe to protect and conserve the Western Ghats, a natural treasure trove not only for India but also for the whole of humanity.

Recommendations

For a project of such magnitude it should be without question that plans should be submitted to UNESCO/IUCN for their consideration and advice, according to § 172 of the Operational Guidelines to the World Heritage Convention. In this context, clarification and clearly defined standards should be provided as to how connectivity between the clusters and components of the site must be ensured.

On the national level, a detailed Environmental Impact Assessment (EIA) of both options on the OUV of the sites should be undertaken, and any decision on the project should be halted until its final results are known.

The Government of India and IUCN should look into the possibility of adding the Kali tiger reserve, the Anshi-Dandeli hornbill conservation reserve, and the Bedthi conservation reserve and Elephant corridors to the existing World Heritage Site in order to fill a gap in the central part of the Western Ghats.

Furthermore, the entire Western Ghats can be considered as a “bio-cultural heritage site” instead of natural world heritage site. It would be appropriate and futuristic if the Government of India could explore such a tagging to the biodiversity rich, culturally diverse human dominated landscapes by nominating the site also under criterion (v) of the Operational Guidelines.

References

- Kanchi Koli (2016). Is the Hubli-Ankola Railway line approved?, <http://www.indiatogether.org>. Retrieved 2020-04-19
- Osipova, E., Shi, Y., Kormos, C., Shadie, P., Zwahlen, C., Badman, T. (2014). IUCN World
- Heritage Outlook 2014: A conservation assessment of all natural World Heritage sites. Gland, Switzerland: IUCN. 64pp.
- Web sites of WHC, IUCN, UNESCO and Government of India (GoI), including MoEF & CC
- “Western Ghats”. [Whc.unesco.org](http://whc.unesco.org). Retrieved 2016-04-20
- Web sites of -The Hindu, Deccan Herald, Indian Railways, NTCA, NBWL and KSBWL. Retrieved on 2020-04-20

Bangladesh Must Honor World Heritage Committee requests to Halt Industry Construction near the Sundarbans

Sultana Kamal, National Committee for Saving the Sundarbans (NCSS)



The National Committee for Saving the Sundarbans (NCSS), a coalition of more than 50 civil society and non-governmental organizations of Bangladesh, is deeply concerned that the Government of Bangladesh (GoB) is paying lip service 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 and 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 5m, wind speeds of 160 km/hr, and seawater flooding up to 15 km from the coastline. Hundreds of lives were lost, farms ruined, and infrastructure washed away. We do not yet know the full extent of impacts, but 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 Rampal, Taltali and Payra/Kalapara. Instead, in its 2020 State of

Conservation Report to UNESCO (SOCR), the GoB twists the meaning of the decisions, pretending they refer only to "environmental clearance or permission" "adjacent to the Sundarbans World Heritage property" "since 2017".



Fig. 1: The Rampal coal-fired power plant construction site, January 2018.

Image: Planet Labs, Inc.

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 stor-



Fig. 2: The Rampal coal-fired power plant construction site, February 2020.

Image: Planet Labs, Inc.

age 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 (10 km 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.

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 10km buffer zone — must be managed for maximum conservation of the Sundarbans’ OUV, particularly the endangered dolphins, tigers, terapins, crocodiles and their remaining habitats. The SOCR 2020 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.

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. River bank 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 are sounding 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*). Hilsa makes up 12%

of the fish catch of Bangladesh, and is one of the most important species of the Sundarbans and the Bay of Bengal.

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. 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 habitats for dolphins that are away from ship traffic. 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 will be dumped in the shallows of the river directly across from the Dhangmari sanctuary. The report states that an environmental assessment that included impacts to 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.

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.” 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.

The impact of shipping on Sundarbans tigers has become even clearer during the COVID shutdown: with less boat traffic, tigers in the West Bengal Sundarbans have been spotted by rangers six to seven times more frequently. In May 2020, dozens of northern river terrapin hatched at Karamjal Wildlife sanc-

tuary less than 5 km from large industrial projects underway near Mongla Port (see Fig. 3). The habitat of these critically endangered turtles must be better assessed and protected from pollution, dredging and shipping.

art pollution controls. Cyclone Amphan clearly illustrates 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. Shipping of coal and coal ash on the Passur River should be avoided entirely.

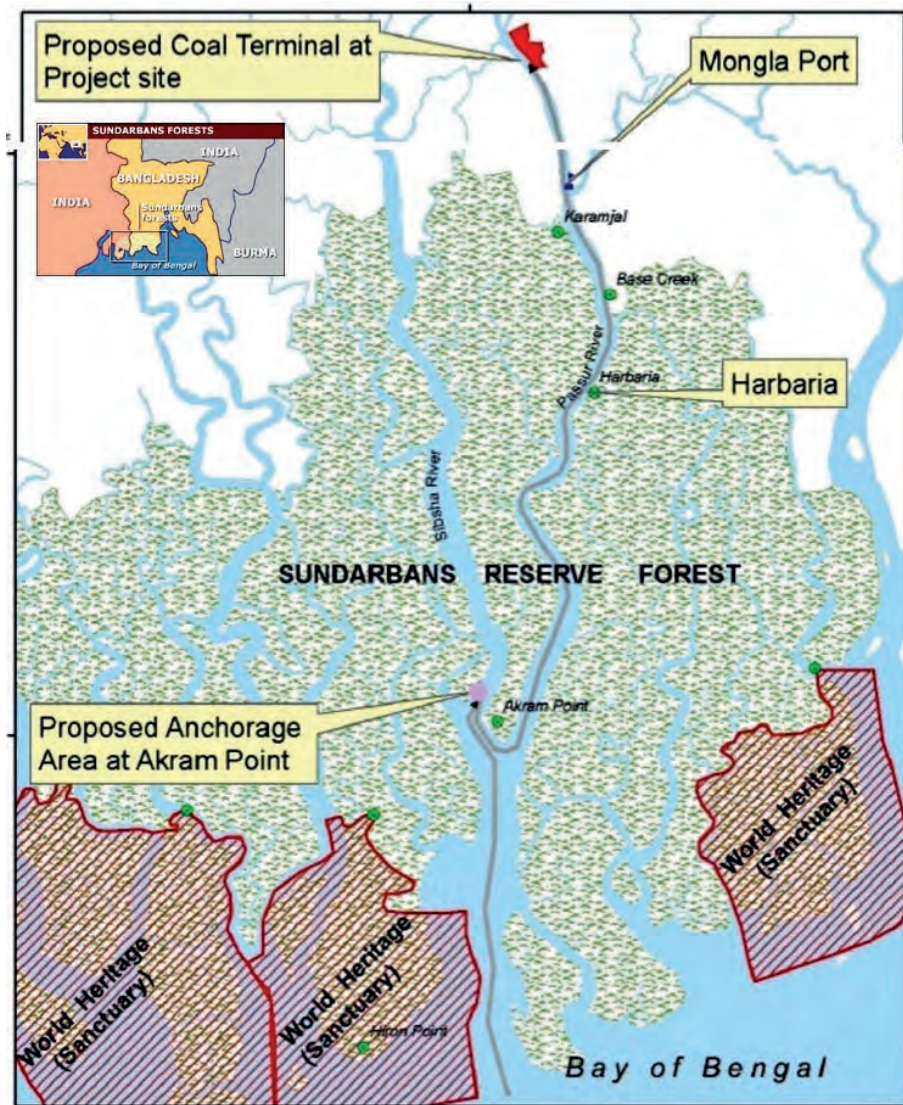


Fig. 3: The site of the Rampal Power Plant (top, in red) and industrial support infrastructure downstream in the Sundarbans. Map: NCCS

Finally, the SEA prospectus of April 2020 indicates the SEA will *not* address pollution mitigation measures needed at the power plants, as requested by Committee decisions 41COM 7B.25.10 and 43 COM 7B.3.9. NCCS 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 the Sundarbans. 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.

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 the World Heritage, including ecological processes, endangered species or biological diversity. New independent modeling of air pollution from the coal plant at Payra shows

3. Pollution controls for new coal fired power plants are insufficient

The SOCR report claims that the Maitree coal fired power plant at Rampal exceeds the World Bank Guidelines, but it cites the wrong guidelines — 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 NO_x, 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

that mercury emissions will reach the Sundarbans and flow into the Bay of Bengal.

We call on the World Heritage Committee to recommend at its 44th session:

1. Add the Sundarbans of Bangladesh to the List of World Heritage in Danger at least until a credible SEA is complete.
2. Require a strict halt to construction of all large-scale infrastructure and industries within 50 km of the Sundarbans Reserve Forest boundary, 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, until a proper SEA has been completed;

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, given that these projects fail to assess potentially severe risks to the OUV of the Sundarbans; and
4. Call upon financiers not to support any large-scale industrial projects that will harm the Sundarbans.

References

- 1 GoB SOCR 2020, page 2 and 31.
- 2 A. H. Chowdury, 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.
- 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-tenualosa-ilisha/>
- 6 <https://drive.google.com/file/d/0B3Rnn2y2GDfbdHNqZ25QcTVnMnM/view>
- 7 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), Page 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.
- 9 <https://whc.unesco.org/en/documents/148097>, p. 23.
- 10 https://www.tbsnews.net/panorama/bengal-tigers-roam-free-tourist-free-sundarbans-825857fbclid=IwAR34Ju138z2qutHz_DyJ4rxs-w9G-6Wn4ODMvOqMhUH0ycKEfRoJEiofsbM; <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 S. Kulp & B. Strauss, New Elevation Data Triple Estimates of global vulnerability to sea level rise and coastal flooding, Nature Communications 10, <https://www.nature.com/articles/s41467-019-12808-z>.
- 13 <https://drive.google.com/file/d/0B3Rnn2y2GDfbdHNqZ25QcTVnMnM/view>
- 14 <http://waterkeepersbangladesh.org/report-of-a-fact-finding-mission-on-possible-risks-of-having-coal-based-power-plants-in-coxs-bazar/>
- 15 <https://www.sciencedirect.com/science/article/pii/S0306261918316921>
- 16 https://energyandcleanair.org/publications/air-quality-health-and-toxics-impacts-of-the-proposed-coal-power-cluster-in-payra-bangladesh/7fbclid=IwAR1Jo8FYKM5yJl16f6yRtlWJ-4TQINJUtrBxbWozr8LIR_HWzi_DTYwOGU

How Australia is Fueling the Destruction of Climate-Vulnerable Australian World Heritage Properties¹

Noni Austin and Martin Wagner, Earthjustice
Ariane Wilkinson, Environmental Justice Australia



Across Australia, the intensifying impacts of climate change are causing the deterioration of World Heritage properties and their Outstanding Universal Value (“OUV”). Australia’s actions are fueling this decline.

Australia’s most iconic World Heritage property – the Great Barrier Reef – is under such serious threat from the impacts of climate change, and essential components of its ecosystem are in such poor health, that it meets the criteria for inscription on the List of the World Heritage in Danger. In 2019, the Great Barrier Reef Marine Park Authority (GBRMPA) concluded that the outlook for the Great Barrier Reef World Heritage Area’s ecosystem is “very poor.” GBRMPA also found that the overall integrity of the Reef is worse than in 2014, and the four “natural heritage values” of the Reef (which correspond to the criteria for assessment of OUV for which the Reef was inscribed on the World Heritage List) have deteriorated since 2014. GBRMPA determined that key species and habitats that contribute to the Reef’s OUV are in “very poor” or “poor” condition, including corals, coral reef habitats, marine turtles, and dugongs.



Fig. 1: Turtle and bleached coral, Heron Island, Great Barrier Reef.

Photo: XL Catlin Seaview Survey - Richard Vevers

The most serious threat to the Reef’s OUV is the impacts of climate change – particularly sea temperature rise. The Reef is currently suffering its third mass coral bleaching event in five

years, with sea surface temperatures in February 2020 the hottest ever recorded. This follows the death of around half of the Reef’s shallow-water corals in unprecedented consecutive bleaching events in 2016 and 2017 caused by elevated sea temperatures attributed to climate change. As temperatures continue to increase, harm to the Reef will intensify.

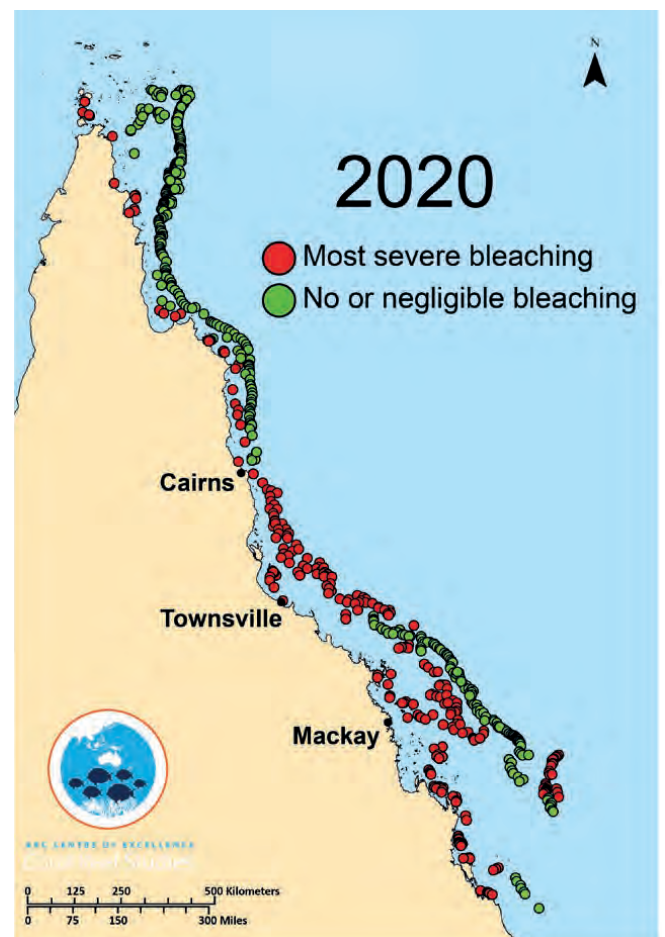


Fig. 2: Coral bleaching as of April 2020. Map: ARC Centre of Excellence in Coral Reef Studies

To protect the Reef’s OUV, global warming must be limited to well below 1.5°C above preindustrial levels. Even 1.5°C of warming will result in further significant deterioration of the Reef, and at the current rate of warming – which puts the

¹ This paper is a summary of a fully-referenced report available at www.earthjustice.org/reefclimatecrisis.

planet on track for over 3°C of warming by 2100 – the Reef as we know it today will cease to exist. For these reasons, accelerated and significant action to reduce greenhouse gas emissions and place the world on a pathway that keeps warming well below 1.5°C is essential to protecting the OUV of the Great Barrier Reef.

The impacts of climate change are also threatening the OUV of other Australian World Heritage properties. In late 2019 and early 2020, bushfires burned an astonishing 80% of the Greater Blue Mountains World Heritage Area and 54% of the Gondwana Rainforests of Australia World Heritage Area, parts of which have historically been too wet to burn. Climate scientists have concluded that the hot and dry conditions that fueled the firestorms were exacerbated by climate change, and that extreme fire weather in Australia will continue to become more frequent and severe as the climate continues to change.

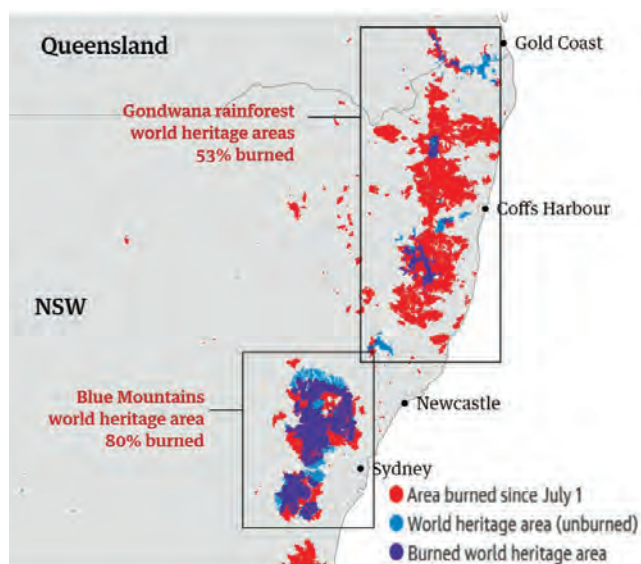


Fig. 3: Areas burned in Australian World Heritage Sites in 2019.
Map: *The Guardian*. Source: EMSINA and Geosciences Australia, Department of the Environment

Although no single country can solve the climate crisis, this does not absolve state parties of their obligations under the World Heritage Convention to address the threat of climate change to the OUV of properties within their territory. The Convention requires state parties to “do all [they] can ... to the utmost of [their] own resources” to protect and conserve World Heritage properties, and to ensure that the OUV of properties in their territories is “sustained or enhanced over time,” including by addressing existing and potential threats – whatever their source. Because warming must be limited to well below 1.5°C to protect the Great Barrier Reef and sustain and enhance its OUV, these obligations require Australia to do all it can to the utmost of its resources to proactively align its actions – including its domestic emissions and exports of fossil fuels that emit greenhouse gases – with limiting warming to well below 1.5°C, and to achieve its fair share of global emissions reductions.

These obligations under the World Heritage Convention exist independently of commitments made by nations under the Paris Agreement. In 2017 and 2018, the World Heritage Committee took a step in the right direction when it emphasized the importance of all state parties ambitiously implementing the Paris Agreement. But in the face of the intensifying threats of climate change to the OUV of the Great Barrier Reef, ambitiously implementing the Paris Agreement is insufficient to satisfy Australia’s obligations under the World Heritage Convention.

If meeting a nation’s commitments under the Paris Agreement does not constitute doing all it can do to the utmost of its resources to protect and conserve the OUV of its World Heritage properties, then the World Heritage Convention requires it to do more, and nothing in the Paris Agreement prevents parties from taking action beyond what they have committed under that agreement. Other United Nations treaty bodies whose mandates are affected by climate change have reached similar conclusions and are recommending climate-related actions by individual states that are independent of those states’ Paris commitments where such actions are necessary to fulfil state obligations under other treaties: see www.earthjustice.org/WorldHeritageClimate for more information in a February 2020 letter from 76 organizations and individuals to the World Heritage Centre and the Advisory Bodies.

Despite being a well-resourced country with high capacity to align its actions with a well-below-1.5°C pathway, Australia is not doing all it can to the utmost of its resources to protect the Great Barrier Reef and to sustain or enhance its OUV, and its 2019 State of Conservation Report under the Convention misrepresents the adequacy of its action to address climate change. The following facts demonstrate that Australia is violating its obligations under the World Heritage Convention and fueling the deterioration of the Reef’s OUV – and the OUV of its other climate-vulnerable World Heritage properties – by failing to align its actions with a well-below-1.5°C pathway or undertake its fair share of global emissions reductions:

- Australia’s greenhouse gas emissions, excluding land use, land-use change and forestry emissions, rose every year from 2014 to 2018, with no significant decline projected to 2030, and Australia is not on track to meet its 2020 or 2030 emissions reductions targets under the United Nations Framework Convention on Climate Change;
- Australia’s proposed reliance on carryover credits to meet its 2020 and 2030 emissions reductions targets undermines global action on climate change because it substantially cuts Australia’s total reductions and is contrary to the Paris Agreement’s goal of increasingly ambitious reductions;
- Australia’s 2030 target does not represent its fair share of global emissions reductions;
- Australia is the one of the world’s two largest exporters of coal and the world’s largest exporter of liquefied natural gas, and plans to continue expanding these exports;



Fig. 4: Mount Piper coal power station in Portland, NSW. Photo: Getty Images/ mikulas

- Under current policies, Australia's per-capita emissions will remain among the highest globally to at least 2030, and Australia's state party report misrepresents the adequacy of its action to address this; and
- Australia's economy remains carbon-intensive and the government actively promotes the use of fossil fuels.

Furthermore, Australia's *Reef 2050 Long-Term Sustainability Plan* – the government's framework for managing the Reef until 2050 – fails to address the threat of climate change beyond a reliance on inadequate government climate policy, and is silent on the impact of emissions from Australian fossil fuel exports.

In these circumstances, to ensure that Australia fulfils its obligations under the World Heritage Convention to protect the Great Barrier Reef and sustain and enhance its OUV, we request that the World Heritage Committee, at its 44th session:

1. Express its deep concern about the very poor and deteriorating outlook for the Great Barrier Reef World Heritage Area and the immediate and long-term threat that climate change poses to the health and survival of the Great Barrier Reef ecosystem;
2. Note that scientific evidence demonstrates that the average global temperature increase must be limited to well below 1.5°C above pre-industrial levels to protect the Outstanding Universal Value of the Great Barrier Reef;
3. Call on Australia to align its actions with a well-below-1.5°C pathway, including by taking steps to decarbonize the economy, promote renewable energy sources, and phase out domestic reliance on fossil fuels and production and export of fossil fuels;
4. Call on Australia to undertake the most ambitious implementation of the Paris Agreement to limit warming to 1.5°C above pre-industrial levels by intensifying its efforts to meet its 2030 emissions reduction target, and to strengthen its 2030 emissions reduction target so that it represents Australia's fair share of global emissions reductions to align with a well-below-1.5°C pathway;
5. Require Australia to revise the *Reef 2050 Long-Term Sustainability Plan* to include:
 - a) A commitment to align its actions with a well-below-1.5°C pathway, including by taking steps to decarbonize the economy, promote renewable energy sources, and phase out domestic reliance on fossil fuels and production and export of fossil fuels;
 - b) A commitment to undertake the most ambitious implementation of the Paris Agreement to limit warming to 1.5°C above pre-industrial levels by intensifying its efforts to meet its 2030 emissions reduction target, and to strengthen its 2030 emissions reduction target so that it represents Australia's fair share of global emissions reductions to align with a well-below-1.5°C pathway;
 - c) Details of national policies and investments with implementation timelines to deliver the above actions; and
 - d) Identification of the specific impacts of climate change on the Great Barrier Reef and the actions that Australia will take to address each of these impacts;
6. Request Australia to implement the new commitments in the *Reef 2050 Long-Term Sustainability Plan* through legislation;
7. Request Australia to invite a monitoring mission as soon as possible to review Australia's response to the climate crisis that is threatening the Outstanding Universal Value of the Great Barrier Reef;
8. Inscribe the Great Barrier Reef World Heritage Area on the List of World Heritage in Danger; and
9. Urge all state parties to align themselves with a well-below-1.5°C pathway to assist in protecting the Outstanding Universal Value of the Great Barrier Reef.

II. World Heritage Sites and Indigenous Peoples

What Does the Future Hold for the Grand Canyon World Heritage Site?

Günter Wippel, Uranium Network



The wider region of the Grand Canyon area is plagued by uranium mines and their tailings. Many of these mines and their tailings have not been rehabilitated, while others are being rehabilitated at very high costs (e.g. Moab tailings pile, rehabilitation costs approx. 1 billion US\$). For this reason, mining and the exploitation of uranium attract a particularly large amount of attention in the southwestern US.

More than 30 years ago, the Canyon Mine project was started near the Grand Canyon, close to the World Heritage site's border: a headframe was installed and a shaft had been sunk to some 50 yards. Canyon Mine was abandoned soon after initiation due to a decline in the price of uranium, and the company entering bankruptcy. For many years, nothing happened.

In 2012, 1 million acres around Grand Canyon were 'withdrawn' from uranium mining by an executive order of the Obama administration (often referred to as a 'ban'), a decision welcomed by the World Heritage Committee (WHC) [WHC Decision 40 COM 7B.104] although the withdrawal does not apply to pre-existing mines and claims.¹ The 'ban' was challenged in court by the mining companies. The Court of Appeals upheld the 'ban' in December 2017 but gave a 'green light' to mining in principle.²

However, in October 25, 2018, the Federal Court of Appeals partially retracted its previous decision by ruling that the Havasupai tribe and environmental advocates (Grand Canyon Trust, the Center for Biological Diversity and the Sierra Club) can indeed challenge an existing uranium mine (Canyon Mine) in court. This opens up the possibility to challenge the license based on a more than 30-year-old EIA.³

1 World Heritage Watch Report 2018, page 48 – 51
<http://world-heritage-watch.de/wp-content/uploads/2018/06/2018-Report-WHW.pdf>

2 US Court of Appeals, No. 15-15754D.C. No.3:13-cv-08045-DGC
<http://cdn.ca9.uscourts.gov/datastore/opinions/2017/12/12/15-15754.pdf>

3 US Court of Appeals No. 15-15857D.C. No.3:13-cv-08045-DGC
<http://cdn.ca9.uscourts.gov/datastore/opinions/2018/10/25/15-15754.pdf> and Court gives tribe, environmentalists new chance to fight uranium mine. By Vandana Ravikumar, Cronkite News, Thursday, Oct. 25, 2018
<https://cronkitenews.azpbs.org/2018/10/25/court-gives-tribe-environmentalists-new-chance-to-fight-uranium-mine/>



Fig. 1: Aerial view of the Canyon Mine, with the Grand Canyon at the horizon.

Photo: EcoFlight / Grand Canyon Trust

On February 9, 2018, the US Department of Interior (DOI) submitted the State Party report to the WHC, noting: *"All of the potential uranium mines are outside the boundaries of Grand Canyon National Park, with the closest of these to the major facilities on the park's South Rim being 24 kilometers (15 miles) away."* Furthermore, the DOI states *"... permitting agencies for any potential mining, are aware of Grand Canyon National Park's designation as a World Heritage Site."*⁴

The World Heritage Committee upholds its concerns in regard to potential impacts of uranium mines even if they lie outside the World Heritage site in its 2018 decision.

"The World Heritage Committee ...

3. Reiterates its significant concern that there are uranium mines proposed in the area surrounding the property and requests the State Party to ensure Environmental and Social Impact Assessments, including a specific assessment of impacts on the Outstanding Universal Value (OUV) of the property, are completed and copies submitted to the World Heritage Centre for review by the World Heritage Centre and IUCN before any decisions are made;" [WHC Decision: 42 COM 7B.82]⁵

4 <https://whc.unesco.org/en/soc/3670> > SOC Report of the State Party 2018 > pdf

5 <https://whc.unesco.org/en/soc/3670> > Decisions adopted by the Committee in 2018 > Adopted

Groundwater flows poorly understood, research underfunded

The Grand Canyon Trust stated: "In fact, more recent incidents at mines near the Grand Canyon demonstrate that there is still a lot of uncertainty about potential pathways for contamination in the region.

In 2010, the USGS [US Geological Service] noted that a 1984 flash flood washed ore from the Hack Canyon mines into Kanab Creek, a major tributary of the Colorado River within the Grand Canyon. On the North Rim, the Pinenut uranium mine sat idle for two decades until 2009, when the mine shaft unexpectedly filled with over 2 million gallons of radioactively contaminated water. (...)

Then, in the winter of 2016-2017, after the mining company claimed it would not hit significant water, the mine shaft at Canyon Mine flooded as the mine operator was in the process of digging it. At the time of this report [January 2019] more than a year after a perched aquifer was pierced, water is still draining from the aquifer into the mine shaft."⁶

The US Federal Government reneged on funding commitments to support an investigation of water resources and other natural resources in the Grand Canyon area that could be affected by uranium development at currently identified and potential future exploration sites. It is considering to expand uranium development in the Grand Canyon area despite the lack of proven uranium ore resources.

With these uncertainties, any uranium – or other – mining activity in the vicinity of the Grand Canyon and its watershed, including groundwater flows, pose a serious risk of pollution or radioactive contamination.

Companies want to mine close to Grand Canyon WHS

After different attempts to overthrow the 'ban', uranium mining companies, UrEnergy and Energy Fuels Inc. launched a petition in January 2018 for a "Section 232" investigation, alleging that US dependency on uranium imports from abroad would jeopardize US national security.

On April 15, 2019 the US Department of Commerce submitted the report of the "Section 232" investigation to the President who then had 90 days to come up with recommendations. However, on July 15, 2019, President Trump did not recognize uranium as a national security issue, and did not impose a quota on uranium imports. Instead, he created a

⁶ Uranium Mining in the Grand Canyon Region, by Amber Reimondo. January 2019: https://www.grandcanyontrust.org/sites/default/files/resources/Uranium_Mining_Grand_Canyon_Region_2019.pdf

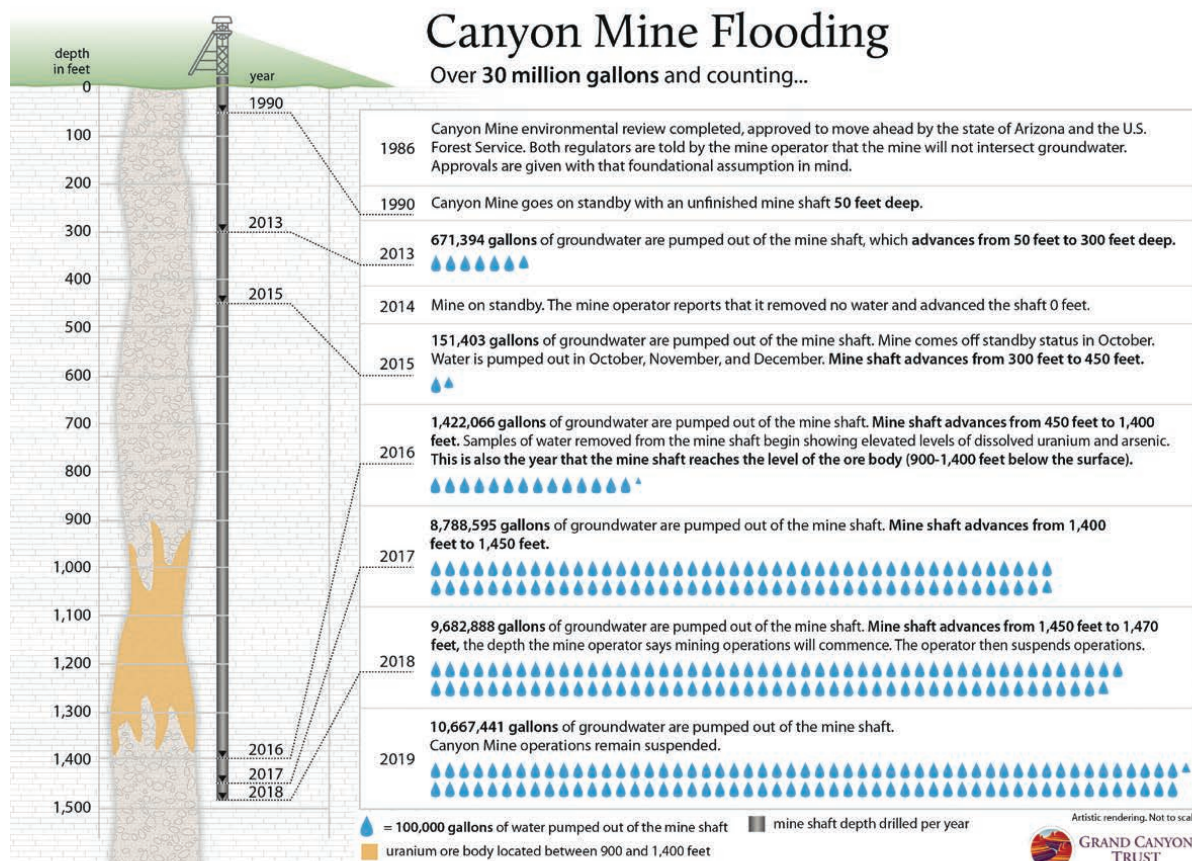


Fig. 2: History of flooding of the Canyon Mine.

'Nuclear Fuel Working Group' (NFWG) to further investigate, again with a 90 days deadline which was extended for another 30 days later on.⁷ The result would have been due before the end of 2019.

Indigenous peoples and environmental NGOs want Grand Canyon protected

The Havasupai Tribe and environmental NGOs had opposed Canyon Mine and other mining activities since the 1980s. In order to achieve permanent protection for the Grand Canyon area, the Havasupai Tribe and the Navajo Nation launched the "**Grand Canyon Centennial Protection Act**" in 2019.

The initiative is supported by representative Raul Grijalva, Tucson, by the Grand Canyon Trust, the Sierra Club and other environmental NGOs. Indigenous peoples and their leaders have an important role in bringing about this initiative.

The bill was approved on October 30, 2019, by the US House of Representatives. Then it was introduced to the US Senate by Arizona Senator Kyrsten Sinema in December 2019. After two readings, the bill was referred to the Senate Committee on Energy and Natural Resources. As of the writing of this article [April 2020], the final vote on the bill has not yet taken place.⁸

2020: Nuclear Fuel Working Group wants to 'Restore American Nuclear Energy Leadership'

The Nuclear Fuel Working Group's results, due late 2019, were never made public. However, on April 23, 2020, the Department of Energy (DoE) issued a press release, titled "Secretary Brouillette Announces The Nuclear Fuel Working Group's Strategy to Restore American Nuclear Energy Leadership"⁹ and a NFWG factsheet.¹⁰

DoE cites the NFWG paper which recommends, among other things, "Taking **immediate and bold action to**

strengthen the uranium mining and conversion industries and **restore the viability of the entire front-end¹¹ of the nuclear fuel cycle** ... The United States currently has two well-defined future defense *needs for domestic uranium supply*: low-enriched uranium needed to produce tritium required for nuclear weapons in the 2040s, and highly-enriched uranium needed to fuel Navy nuclear reactors in the 2050s."

Although the economic feasibility of such an undertaking is questionable, under the circumstances given, the 'need' to mine uranium within the US poses a serious threat to the Grand Canyon area as a whole and to the World Heritage site.

In addition, environmental regulations were relaxed 'drastically' due to the Coronavirus outbreak¹², and it remains unclear whether – and when – they will be tightened again.

What does this mean for the Grand Canyon World Heritage Site?

The OUV of the Grand Canyon WHS, including the rare surface and ground water resources that were fundamental to creation of the Grand Canyon, the continuing evolution of its unique geologic landscape, and the cultural resources of the indigenous peoples who have inhabited the Grand Canyon and surrounding area for a very long time, are at risk from uranium mining. This development has a serious potential to permanently damage surface and ground waters in the Grand Canyon area.¹³

We ask the World Heritage Committee

1. To recommend an extension of the moratorium for uranium exploration and mining in the area unless and until hydrological and biological baseline studies to determine links between potential uranium mine sites, water resources and biological resource in the Grand Canyon area are reinstated, completed and presented to the World Heritage Committee, and
2. To demand the US Federal Government to reinstate the research program to define whether the hydrological and biological resources of the Grand Canyon are potentially affected by uranium mining.

7 Memorandum on the Effect of Uranium Imports on the National Security and Establishment of the United States Nuclear Fuel Working Group www.whitehouse.gov/presidential-actions/memorandum-effect-uranium-imports-national-security-establishment-united-states-nuclear-fuel-working-group/

8 Sinema Introduces Bill Protecting the Grand Canyon, Strengthening Arizona's Economy <https://www.sinema.senate.gov/sinema-introduces-bill-protecting-grand-canyon-strengthening-arizonas-economy> and <https://www.congress.gov/bill/116th-congress/house-bill/1373/committees>

9 www.energy.gov/articles/secretary-brouillette-announces-nuclear-fuel-working-groups-strategy-restore-american

10 www.energy.gov/strategy-restore-american-nuclear-energy-leadership

11 'Front end of the nuclear fuel cycle' refers to installations such as uranium mines, mill, enrichment and fuel rod fabrication plants.

12 New York Times, 26 March 2020: E.P.A., Citing Coronavirus, Drastically Relaxes Rules for Polluters, <https://www.nytimes.com/2020/03/26/climate/epa-coronavirus-pollution-rules.html>

13 For more details, see: Canyon Mine – Why No Uranium Mine is Safe for the Grand Canyon Region" by Grand Canyon Trust, www.grandcanyontrust.org/blog/problems-canyon-mine-new-report

Trump's Border Wall Threatens World Heritage Site and Biosphere Reserve

Alejandro Olivera, Center for Biological Diversity Mexico



Mexico's El Pinacate and Gran Desierto de Altar Biosphere Reserve World Heritage property ("El Pinacate") was inscribed on the World Heritage List in 2013,¹ in part, to protect the area's extraordinary "biodiversity and threatened species." This diversity includes numerous species of imperiled wildlife that depend on cross-border connectivity, like imperiled Sonoran pronghorn, bighorn sheep, pygmy owl, and jaguar. El Pinacate's roughly 180-kilometer northern boundary abuts the Mexico – United States border, and the U.S. border areas have been deemed critical to El Pinacate's "integrity and ecological connectivity" and to the survival and recovery of many Sonoran species. Construction of a 30ft-high border wall is already underway across the northern boundary of El Pinacate, threatening to block critical wildlife migration in and out of this unique protected habitat and endangering the area's connectivity and integrity.

In 2017, the Center for Biological Diversity, Greenpeace Mexico and the Tohono O'odham Tribe in Sonora petitioned for "in danger" status for El Pinacate threatened by U.S. President Donald Trump's border wall.

El Pinacate: Its Wildlife and People

El Pinacate encompasses an approximately 714,566-hectare area in the Sonoran Desert of northwestern Mexico.² This remarkably undisturbed expanse of high-quality desert habitat is comprised of a large dormant volcanic area in the east (the Pinacate Shield) and North America's largest field of active sand dunes to the west (the Gran Altar Desert).³ The Mexican government declared the same area a Biosphere Reserve and Natural Protected Area.⁴

The northern boundary of the El Pinacate reserve directly abuts the United States-Mexico border;⁵ however, the broader Sonoran Desert and its extraordinary habitat extend far into the United States. In a 2013 evaluation, the IUCN noted that the El Pinacate property is part of "the largest contiguous desert protected area complex in North America," which includes Mexico's Alto Golfo de California and Delta del Rio Colorado National Biosphere Reserve to El Pinacate's south and the United States' Cabeza Prieta National Wildlife Refuge, Organ Pipe Cactus National Monu-



Fig. 1: Pinacate y Gran Desierto de Altar Biosphere Reserve.

Photo: Comisión Nacional de Áreas Naturales Protegidas

ment, and Barry M. Goldwater Range to the north⁶ (Fig. 2). These U.S. border areas "contribut[e] to the integrity and ecological connectivity" of the El Pinacate World Heritage property.⁷ The new border wall currently under construction cuts directly through the core of this protected, contiguous habitat.

El Pinacate Site's diverse landscape provides "extraordinary habitat diversity,"⁸ hosting over 540 species of vascular plants, 44 mammal species, 225 bird species, and over 40 reptile species, including species endemic only to the Sonoran Desert.⁹ In its nomination for UNESCO protection, Mexico highlighted the area's habitat for the Sonoran pronghorn, bighorn sheep, ferruginous pygmy owls and other owls, jaguar, desert pupfish, mule deer, gray fox, several bats, cactus, and other species.¹⁰

Mexico further highlighted El Pinacate's historic and present-day cultural importance for the indigenous Tohono O'odham people, whose traditional lands extend across the modern-day U.S.-Mexico border (see Fig. 3). El Pinacate is particularly sacred to the Tohono O'odham because the origin of their creation "occurred in El Pinacate peak."¹¹

Ancestors of the Tohono O'odham began inhabiting El Pinacate Site around 5,000 years ago, and the area still contains many significant archaeological remains because,



Fig. 2: Protected areas and World Heritage Sites in the Sonora Desert Region.

Map: Center for Biological Diversity

unlike many areas, the archaeological evidence of human occupation has remained “virtually unchanged by erosion.”¹² This includes Tohono O’odham “geoglyphs, intaglio, camp clearings, sleeping quarters, trails, mortars and petroglyphs.”¹³ The Tohono O’odham still regularly use El Pinacate for ceremonies and as an essential passage area “on their trip to the Gulf of California to collect salt and sea shells.” Overall, the area “holds an exceptional testimony of the presence of Tohono O’odham and their ancestors.”¹⁴

U.S. Border Wall and Its Impacts

The construction of a border wall by the United States government is imperiling both wildlife and the traditional and ceremonial use of the El Pinacate Site by the Tohono O’odham. The Trump administration has waived 41 laws that protect cultural resources, Native American graves, endangered wildlife, clean air, clean water, and public lands to speed border wall construction along El Pinacate’s boundary,¹⁵ including through two U.S.-federally protected wilderness areas directly adjacent to the site: Organ Pipe Cactus National Monument and the Cabeza Prieta National Wildlife Refuge.

To pay for these projects, Trump declared a “National Emergency” and diverted more than \$6 billion for wall construction with no approval from the U.S. Congress. These funds are currently being used to build walls directly adjacent to El Pinacate Site.¹⁶

If completed, these border walls will cut off all habitat north of El Pinacate to most terrestrial wildlife, blocking critical migration and impeding recovery of imperiled, transboundary species.

Border walls and fences “can cause declines and even local disappearance of species.”¹⁷ These barriers impede the essential mobility for many species’ dispersal, migration, search for food and water, and escape from predators; frag-



Fig. 3: Historical lands and the present-day reservation of the Tohono O’odham.

Map: Forest Purnell / Institute for Infinitely Small Things

ment habitat and populations; and can even cause direct mortality.¹⁸ Limiting species’ dispersal can harm wildlife by “reduc[ing] gene flow between populations . . . , which can lead to genetic divergence between populations and rapid loss of genetic diversity in small populations.”¹⁹ In fact, “[e]ven slight decreases in dispersal may have large consequences for species’ populations,” and “smaller isolated populations may . . . be subject to an increased risk of extinction.”²⁰ “Human disturbance, vegetation removal and additional barriers, roads and lighting that accompany fences likely further reduce border permeability” for wildlife.²¹ At least 93 species at risk of extinction will be further imperiled by border wall construction, including impacts to critical habitat for 25 of these species.²²

Habitat connectivity is particularly important in the Sonoran Desert region, as geography, elevation, and moisture gradients severely limit the range of many Sonoran species.²³ The species most affected by the construction and operation of the wall will be terrestrial species that have restricted habitats, low reproductive capacity, require large territories, and/or exist in low densities. As such, large carnivores and large herbivores will be impacted most severely,²⁴ especially at-risk species like Sonoran pronghorn, bighorn sheep, jaguar, and others.²⁵ However, barriers can also “affect small creatures like reptiles, insects, and . . . birds,” including ferruginous pygmy owls, and even plants “by affecting processes like seed dispersal and pollination.”²⁶

Existing border walls have had little to no discernable impact on reducing illicit crossings of people or drugs,²⁷ but they have severe and demonstrable impacts on wildlife. If

the wall across the northern boundary of the El Pinacate Site is completed, it will contribute to the decline of the Sonoran pronghorn, bighorn sheep and other species in the United States while fragmenting wildlife populations that occur on both sides of the border. Beyond jeopardizing wildlife, endangered species and public lands, the border wall is part of a larger strategy of ongoing border militarization that damages human rights, civil liberties, native lands and international relations. The border wall impedes the natural migrations of people and wildlife that are essential to healthy diversity.

These walls will also cut off the Tohono O'odham people's access to traditional lands and sacred sites, including tribal members' ability to conduct the ceremonial salt pilgrimage — an ancient ritual that, according to the Tohono O'odham, has occurred since time immemorial.²⁸ In June of 2019, the Tohono O'odham government passed a resolution opposing border wall construction in this region on the grounds that it would threaten the future of the ceremonial salt pilgrimage, stating: "plans for a new wall would make it impossible to carry out the salt ceremony and threaten to end this sacred tradition forever." (see Annex)²⁹

Walling off the El Pinacate Site from habitat north of the border will cut the world's largest swath of protected Sonoran Desert habitat in two. This will be a disaster for the wildlife the site was designated to protect, and will alter the traditional ceremonies of the Tohono O'odham people, whose use of this sacred landscape must be preserved.

We strongly urge the World Heritage Committee to:

1. request a report from the United States and Mexico regarding the Site, the wall, construction progress, and its effects on El Pinacate, and
2. request the IUCN/World Heritage Centre evaluate the Site, with a view to considering inscription of the El Pinacate property on the List of World Heritage in Danger at the Committee's 45th Session.

These efforts will bring much-needed international attention to this emerging conservation issue.

References

- 1 World Heritage Committee Decision 37 COM 8B.16, Decisions Adopted by the World Heritage Committee at its 37th Session (Phnom Penh, 2013), WHC-13/37.COM/20, Paris, 5 July 2013 ("WHC Decision 37 COM 8B.16"). Available at: <http://whc.unesco.org/en/list/1410/documents/>.
- 2 Id.
- 3 Id. at 37.
- 4 Mexican Federal Register. Diario Oficial de la Federación. June 10th 1993. DECRETO por el que se declara área natural protegida con el carácter de Reserva de la Biosfera, la región conocida como El Pinacate y Gran Desierto de Altar, ubicada en los municipios de Plutarco Elías Calles, Puerto Peñasco y San Luis Río Colorado, Son. http://dof.gob.mx/nota_detalle.php?codigo=4744601&fecha=10/06/1993
- 5 IUCN Evaluation, at 88.
- 6 Id. at 88, 90.
- 7 Id.
- 8 WHC Decision 37 COM 8B.16, at 168.
- 9 IUCN Evaluation, at 88.
- 10 Mexico WH Nomination, at 61 (highlighting at-risk species that inhabit El Pinacate), 255.
- 11 Mexico WH Nomination, at 19.
- 12 Id. at 69.
- 13 Id.
- 14 Id. at 111.
- 15 84 CFR 21798. May 15, 2019. Pages 21798-21800 <https://www.federalregister.gov/documents/2019/05/15/2019-10079/determination-pursuant-to-section-102-of-the-illegal-immigration-reform-and-immigrant-responsibility#print>
- 16 Newsweek. 2019. Donald Trump's Border Wall Construction Crew Just Bulldozed Through the Iconic Cacti This National Park Was Created To Protect. Chantal Da Silva. October 7, 2019. <https://www.newsweek.com/donald-trump-border-wall-construction-saguaro-cacti-organ-pipe-cactus-national-monument-1463559>.
- 17 Trouwborst, A., F. Fleurke, & J. Dubrelle. 2016. Border Fences and their Impacts on Large Carnivores, Large Herbivores and Biodiversity: An International Wildlife Perspective. *RECIEL* 25(3) 2016. DOI: 10.1111/reel.12169.
- 18 Id.; Cordova & del la Parra (2007), at 78.
- 19 Lasky, J.R., W. Jetz, & T.H. Keitt. 2011. Conservation biogeography of the US-Mexico border: a transcontinental risk assessment of barriers to animal dispersal. *Diversity Distrib.* (2011) 1-15. DOI: 10.1111/j.1472-4642.2011.00765x.
- 20 Id.
- 21 Id.
- 22 A Wall in the Wild: The Disastrous Impacts of Trump's Border Wall on Wildlife by Brian Segee; Curt Bradley; Noah Greenwald; Tierra Curry. May 1, 2017
- 23 Flesch, A.D., C.W. Epps, J.W. Cain, M. Clark, P.R. Krausman, & J.R. Morgart. 2009. Potential Effects of the United States Border Fence on Wildlife. *Conserv. Biol.* 24: 171-181. doi:10.1111/j.1523-1739.2009.01277.x.
- 24 Trouwborst, et al. 2016.
- 25 López-González, C. A., N. E. Lara-Díaz, D- Ávila-Aguilar & M. F. Cruz-Torres. 2012. Áreas de interés binacional para mantener la conectividad de poblaciones de fauna silvestre compartida con potenciales afectaciones por la construcción del muro fronterizo. Informe Final de la Universidad Autónoma de Querétaro al Instituto Nacional de Ecología. 292 pp.
- 26 Trouwborst, et al. 2016.
- 27 U.S. Government Accountability Office. 2017. Southwest Border Security: Additional Action Needed to Better Assess Fencing's Contributions to Operations and Provide Guidance for Identifying Capability Gaps. GAO-17-331.
- 28 Tohono O'odham Legislative Council. 2007. Resolution NO. 07-714, Authorizing Delegation to Explore Means of Preserving Salt Pilgrimage Sites. November 9, 2007.
- 29 Traditional O'odham Leaders of Sonora. 2019 Acta/Resolution passed June 16, 2019.

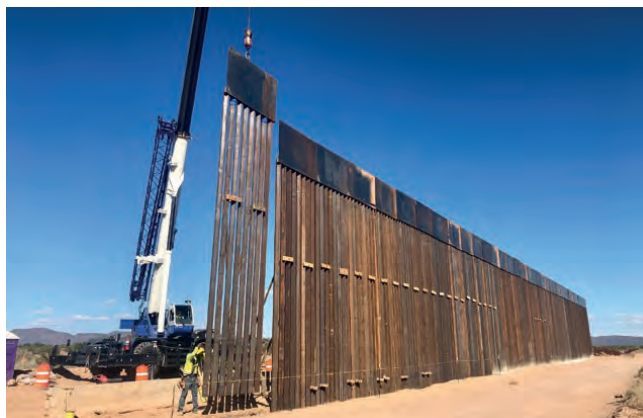


Fig. 4: Trump's border wall under construction at Organ Pipe Cactus National Monument. Photo Laiken Jordahl

Annex: Resolution of the Traditional O’odham Leaders. O’odham in Mexico



Resolution of the Traditional O’odham Leaders O’odham in Mexico

Resolution No. 2019-01

Cedagi Wahia/

Pozo Verde

Wo’osañ/

El Bajio

Kom Wahia/

Cumalito

Ku Wahia/

Cubabie

Cu:wi I-gersk/

San Francisquito

Nepodagk/

Represso Enrique

Wa:pk/

Carrizalito

Soñ Oidag/

Sonoyta

Wa:k/

Quito Vac

Nolik/

Las Norias

S-cuk Su:dagi/

Pozo Prieto

Totssagi/

Rancho Espuma

A:l Pi’ckin/

Pitiquito

Hodai Ke:k/

Puerto Peñasco

Ka:wolk/

Caborca

Ge’e Pi’ckiñ/

Hermosillo

Whereas, The Tohono O’odham and our ancestors have inhabited lands from the Gila River area in present-day Arizona south to the Sea of Cortez in Northern Mexico from time immemorial. Our traditional territory (Jewed) encompasses lands now considered Organ Pipe Cactus National Monument, Cabeza Prieta National Wildlife Refuge and the Biospheres of Pinacate and Gran Altar Desert, among many other areas;

Whereas, in 1854 the United States created an international boundary with Mexico that cuts through Tohono O’odham lands. The Tohono’ O’odham have experienced the negative consequences of this imposed border for generations. Now, under U.S. President Trump these issues have escalated into a push to build a solid border wall across traditional O’odham lands;

Whereas, The Tohono O’odham Legislative Council passed a formal resolution opposing the construction of a border wall on February 8, 2017 (Resolution NO. 17-053). The resolution condemned the Trump administration’s plans to build a border wall on the grounds that a wall would prevent Tohono O’odham members from making traditional border crossings for ceremonial and religious purposes, prevent wildlife from conducting migrations essential for their survival, a wall would destroy the sacred saguaro cactus and other culturally significant plants, among many other reasons;

Whereas, the ceremonial salt pilgrimage is a central part of the O’odham himdag that has occurred since time immemorial. The salt pilgrimage passes through lands now considered the Organ Pipe Cactus National Monument, the El Pinacate-Gran Desierto de Altar Biosphere Reserve, and the Alto Golfo del California Biosphere Reserve. In November 2007 Tohono O’odham Legislative Council passed a formal resolution affirming unlimited and unrestricted access to these sacred sites in the U.S. and Mexico for traditional purposes like the ceremonial salt pilgrimage (Resolution 07-714);

Whereas, On May 6, 2019, the United States Department of Homeland Security announced that it intends to construct at least 44 miles of border walls across traditional Tohono O’odham lands, including through Organ Pipe Cactus National Monument and Cabeza Prieta National Wildlife Refuge, where the path of the ceremonial salt pilgrimage crosses the border;



Resolution of the Traditional O’odham Leaders O’odham in Mexico

Resolution No. 2019-01

Cedagi Wahia/

Pozo Verde

Wo’osañ/

El Bajío

Kom Wahia/

Cumalito

Ku Wahia/

Cubabie

Cu:wi I-gersk/

San Francisquito

Nepodagk/

Represso Enrique

Wa:pk/

Carrizalito

Soñ Oidag/

Sonoyta

Wa:k/

Quito Vac

Nolik/

Las Norias

S-cuk Su:dagi/

Pozo Prieto

Totssagi/

Rancho Espuma

A:l Pi’ckin/

Pitiquito

Hodai Ke:k/

Puerto Peñasco

Ka:wolk/

Caborca

Ge’e Pi’ckiñ/

Hermosillo

Whereas, On May 15th, without consulting with the Tohono O’odham or obtaining tribal approval, the U.S. Department of Homeland Security issued a \$646,000,000 construction contract to build border walls through these areas. That same day, the Trump administration waived 41 American laws that would normally apply, including the Native American Graves Protection and Repatriation Act and the American Indian Religious Freedom Act. The Tohono O’odham Legislative Council has formally condemned attempts to waive these and other laws under Resolution NO. 17-053. Waivers of laws like these are significantly detrimental to indigenous peoples and clearly signals that the U.S. government has no interest in preserving our heritage, culture, environment or way of life;

Whereas, Building a border wall through Organ Pipe Cactus National Monument and Cabeza Prieta National Wildlife Refuge would cut across the route of the ceremonial salt pilgrimage and damage Quitobaquito spring, a sacred desert oasis used during the pilgrimage. The plans for this wall would make it impossible to carry out the salt ceremony and threaten to end this sacred tradition forever;

Whereas, The Traditional O’odham Leaders in Sonora, Mexico, previously recognized by the T.O.N. Legislative Council in six resolutions prior, with the most recent being Res. 18-049, as the official representatives to the Tohono O’odham Nation for the O’odham in Mexico;

Whereas, The Traditional O’odham Leaders hereby oppose the border wall construction in traditional O’odham lands known as Organ Pipe Cactus National Monument, the Cabeza Prieta National Wildlife Refuge and the historic O’odham lands, due to the severe harm these border walls would cause to our sacred traditions, our environment, and our way of life, we call for the immediate opposition and all efforts to disallow the building of a border wall;

Whereas, We recognize and act to uphold Articles 10, 12, 25, 26, 27, 30, and 32 of the United Nations Declaration of the Rights of Indigenous Peoples (2007) which state three principles:

- 1) The right to inhabit and use traditional lands.



Resolution of the Traditional O'odham Leaders O'odham in Mexico

Resolution No. 2019-01

<i>Cedagi Wahia/</i>	Article 10: Indigenous peoples shall not be forcibly removed from their lands or territories. No relocation shall take place without the free, prior and informed consent of the indigenous peoples concerned and after agreement on just and fair compensation and, where possible, with the option of return.
<i>Pozo Verde</i>	
<i>Wo'osañ/</i>	
<i>El Bajío</i>	
<i>Kom Wahia/</i>	Article 26, Section 1: Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
<i>Cumalito</i>	
<i>Ku Wahia/</i>	Article 26, Section 2: Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.
<i>Cubabie</i>	
<i>Cu:wi I-gersk/</i>	
<i>San Francisquito</i>	
<i>Nepodagk/</i>	2) The right to exercise the religious relationship with the land.
<i>Represso Enrique</i>	
<i>Wa:pk/</i>	Article 12, Section 1: Indigenous peoples have the right to manifest, practice, develop and teach their spiritual and religious traditions, customs and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and the right to the repatriation of their human remains.
<i>Carrizalito</i>	
<i>Soñ Oidag/</i>	
<i>Sonoyta</i>	
<i>Wa:k/</i>	Article 25: Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.
<i>Quito Vac</i>	
<i>Nolik/</i>	
<i>Las Norias</i>	
<i>S-cuk Su:dagi/</i>	3) The right to prior consultation and consent.
<i>Pozo Prieto</i>	
<i>Totssagi/</i>	Article 27: States shall establish and implement, in conjunction with indigenous peoples concerned, a fair, independent, impartial, open and transparent process, giving due recognition to indigenous peoples' laws, traditions, customs and land tenure systems, to recognize and adjudicate the rights of indigenous peoples pertaining to their lands, territories and resources, including those which were traditionally owned or otherwise occupied or used. Indigenous peoples shall have the right to participate in this process.
<i>Rancho Espuma</i>	
<i>A:l Pi'ckin/</i>	
<i>Pitiquito</i>	
<i>Hodai Ke:k/</i>	Article 30, Section 2: States shall undertake effective consultations with the indigenous peoples concerned, through appropriate procedures and in particular through their representative institutions, prior to using their lands or territories for military activities.
<i>Puerto Peñasco</i>	
<i>Ka:wolk/</i>	
<i>Caborca</i>	
<i>Ge'e Pi'ckiñ/</i>	Article 32, Section 2: States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their
<i>Hermosillo</i>	



Resolution of the Traditional O'odham Leaders O'odham in Mexico

Resolution No. 2019-01

Cedagi Wahia/

Pozo Verde

Wo'osañ/

El Bajío

Kom Wahia/

Cumalito

Ku Wahia/

Cubabie

Cu:wi I-gersk/

San Francisquito

Nepodagk/

Represso Enrique

Wa:pk/

Carrizalito

Soñ Oidag/

Sonoyta

Wa:k/

Quito Vac

Nolik/

Las Norias

S-cuk Su:dagi/

Pozo Prieto

Totssagi/

Rancho Espuma

A:l Pi'ckin/

Pitiquito

Hodai Ke:k/

Puerto Peñasco

Ka:wolk/

Caborca

Ge'e Pi'ckiñ/

Hermosillo

free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.

Now therefore be it resolved that, the Traditional O'odham Leaders observe and declare that the federal government of the United States is violating these three principles through the imminent proposed construction of a border wall through Organ Pipe Cactus National Monument, the Cabeza Prieta National Wildlife Refuge and the historic O'odham lands.

Be it further resolved that, building a border wall through Organ Pipe Cactus National Monument and Cabeza Prieta National Wildlife Refuge would cut across the route of the ceremonial salt pilgrimage and damage Quitobaquito spring, a sacred desert oasis used during the pilgrimage. The plans for this wall would make it impossible to carry out the salt ceremony and threaten to end this sacred tradition forever;

Be it finally resolved that, the Traditional O'odham Leaders hereby oppose the border wall construction in traditional O'odham lands known as Organ Pipe Cactus National Monument, the Cabeza Prieta National Wildlife Refuge and the historic O'odham lands, due to the severe harm these border walls would cause to our sacred traditions, our environment, and our way of life, we call for the immediate opposition and all efforts to disallow the building of a border wall.

The foregoing Resolution was passed by the Traditional O'odham Leaders on June 16 in the Month of June, 2019 at which a majority of the Leaders were present and approved this resolution.

Verlon Jose, Governor
Traditional O'odham Leaders

Attest:

Canaima National Park: The Fabled “Lost World” Endangered by a Gold Rush

SOS Orinoco

SOS ORINOCO

A gold rush is having a negative impact on Canaima National Park (CNP), a World Heritage Site. Various studies have demonstrated the destruction of at least 521 hectares of its ecosystems, from which gold is being extracted by means of semi-mechanized techniques, and the use of mercury, a highly toxic metal. Additionally, more than 20 floating factories or “mining rafts” are devastating the bottom of the crystalline rivers in the vicinity of famous Angel Falls, the world’s highest uninterrupted waterfall.

This gold fever is being nurtured by the Venezuelan government through a national policy that promotes extractive mining, known as the “Orinoco Mining Arc,” enacted in 2016 in violation of Venezuela’s Constitution. It encompasses an immense extension of Venezuela’s territory (111,843 km²) consisting of a crescent-shaped belt that follows along the right bank of the Orinoco River and bulges southward, all within the state of Bolívar (Fig. 1).

The Orinoco Mining Arc is the “hallmark” of a policy of total openness to mining in general, but whose main ambition is gold and coltan. This policy gives the outward appearance of a delimited geographical framework, but in reality, it aspires to spread out into regions not defined by official maps as being inside the Orinoco Mining Arc, as is the case with CNP. Furthermore, this has given rise to a gold rush throughout the entire region south of the Orinoco River, including state of Amazonas, and to a proliferation of the issuance of certificates, as well as *de facto* permits, for the extraction of metallic and non-metallic minerals throughout the rest of the country. This situation is accentuated by the complex humanitarian crisis in which Venezuela is immersed. Future scenarios for CNP are not encouraging, because there are no environmental authorities present in the field, nor is there any political will or legal governance to deal with the mining operations. This leads to the expectation of further devastation of CNP, one of the most extraordinary natural

areas on the planet, as well as serious damage to the native culture of the Pemón people, much of whose territory is located inside CNP.

Canaima as a World Heritage Site

Canaima National Park is located in the basin of the Orinoco River, which is the world’s third-largest river by volume and has a highly biodiverse system with marked geographical variations. Within its boundaries, there is a need to protect what is a representative part of Venezuela’s share of the Guiana Shield, one of the regions with the greatest biological endemism in Venezuela and the northern portion of

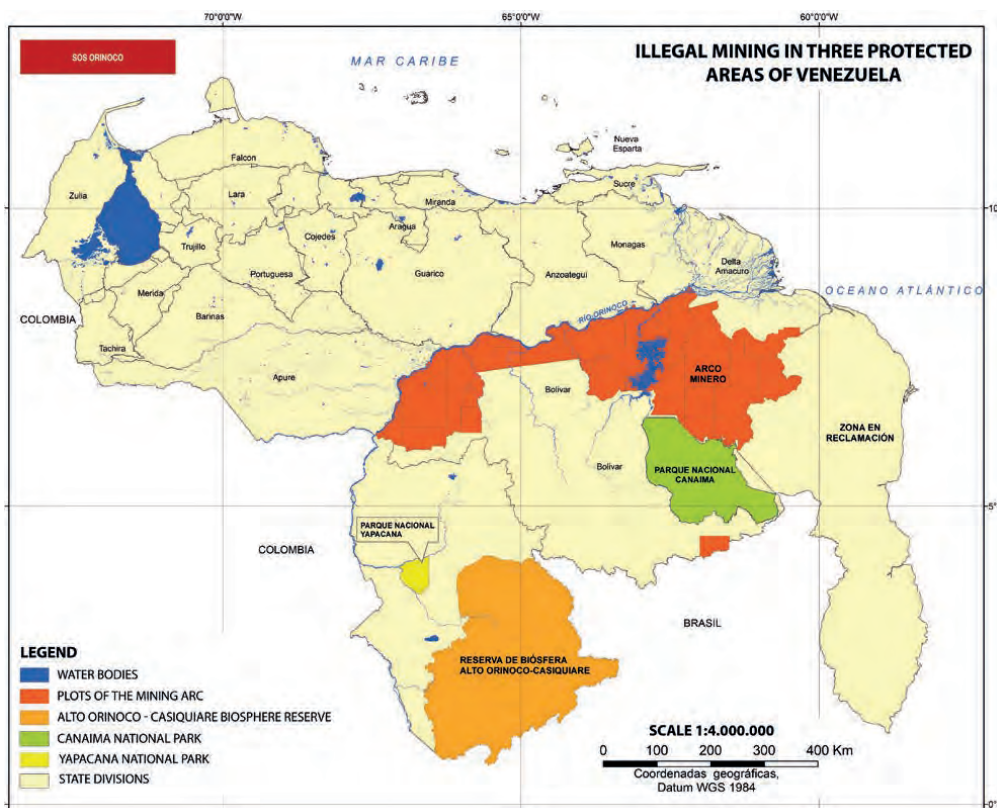


Fig. 1: Illegal Mining in three protected areas of Venezuela.

Map: SOS Orinoco

South America, especially with respect to its flora. The Guiana Shield is a region dominated by table-top mountains known as *tepuis*, consisting of some of the most ancient igneous and sedimentary rocks in the planet.

The summit of each *tepu* is unique. These summits represent “biological islands” that, for thousands of years, have been subjected to processes of geological erosion, biological speciation and unique evolutionary adaptations under conditions peculiar to each *tepu*. Due to the extraordinary natural and cultural value of the region, the Venezuelan government proposed CNP as a World Heritage Site, and in 1994 it was accepted as such by decision CONF 003 XI of the Committee of the World Heritage Centre. This acceptance highlights CNP as a common heritage of humanity, thus obligating the Venezuelan State to preserve it in all its integrity, scenic beauty and heritage value.



Fig. 2 and 3: The waterfalls descending from the tepuis, among them the Angel Falls (left) are the highest in the world.

Photos: SOS Orinoco

Gold mining was not identified as the main threat to CNP until a few years ago. Historically, the Committee of the World Heritage Centre had identified three threats to CNP: power lines, the lack of a management plan for the park’s total area, and conflicts between the indigenous Pemón communities and the military. The Committee’s last official report, in 2001, does not refer to mining as a threat despite the fact that this was mentioned during the speech at the 25th Ordinary Session of the World Heritage Committee: “There are concerns about potential impacts associated with mining around the Canaima National Park. On several occasions, indigenous people have reported an influx of small-scale miners heading towards the headwaters of the Caroní River inside the National Park. Although illegal, these violations have not been persecuted. Without due ecological consideration, the potential industrial development of the region adjacent to Canaima National Park and the advance of mining threaten to isolate the Park within a few years, thus putting in jeopardy its long-term integrity.”

In 2007 a technical report appeared suggesting for the first time that mining activity in the vicinity of CNP constituted a threat that needed to be taken into consideration (Novo and Díaz, 2007). The authors of the report identified the following threats: wildfires, unregulated tourist activities, metallic and non-metallic mining, and the absence of policies for the sustainable management of the park. Seven years later, Osipova et al. (2014) suggested that CNP should be catalogued as a heritage site of “significant concern,” which is equivalent to a score of 4 on a negativity scale where 5 is the worst score.

Subsequently, the SOSOrinoco (2018) team published a report that presents proof of 15 mining sites inside CNP and 18 in adjacent bordering areas, located at distances ranging from 0 to 11,500 meters from its boundaries. In June of 2018, the report was submitted directly to UNESCO with sugges-



tions for addressing the mining problems, unsustainable tourism at Roraima, road development, and uncontrolled wildfires. This report has been just updated, showing that the mining conflict persists and is increasing (SOSOrinoco, 2020). One of the main conclusions of the SOSOrinoco reports is the need to include CNP on the List of World Heritage Sites in Danger.

Gold Fever in Canaima

Based on an exhaustive bibliographic review, it became evident that the first spatial analysis for determining changes in groundcover and land use inside CNP resulting from

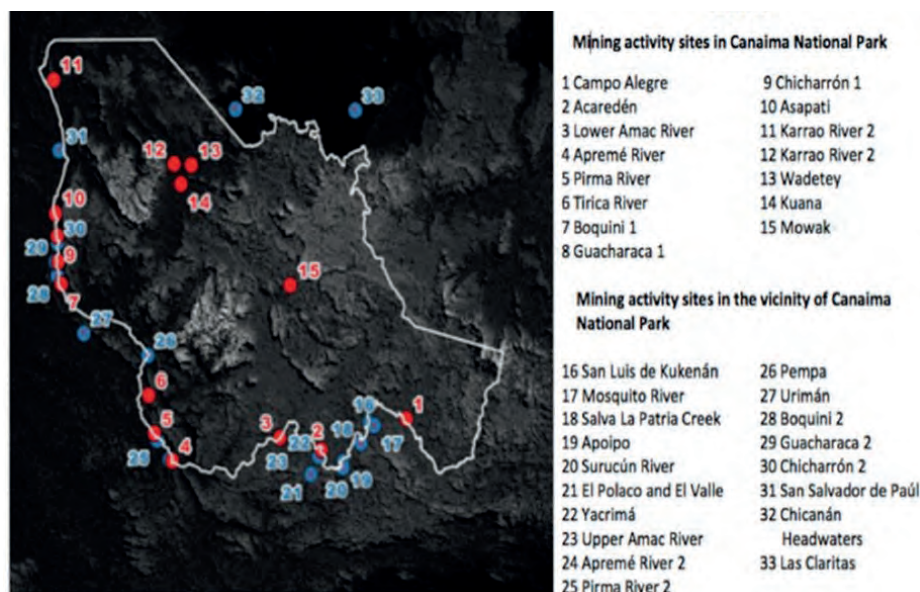


Fig. 4: Mining Sites in Canaima National Park and its vicinity.
Map: SOS Orinoco

In total, 33 mining sites were identified, of which 15 are located inside the park and 18 in its immediate vicinity. The sediments and contaminants from these mining operations end up in the Caroní River (Fig. 4).

The pattern observed through the satellite imagery shows that there is an interrelationship between the mining activities and population centers (within a 20 km radius), roads or rivers, and airstrips (Fig. 5).

mining activity had been published in 2010 by Sosa, who demonstrated the accelerated growth of mining activity in the Cuyuní sector, adjacent to the park. Five years later, the Ministry of Ecosocialism and Water (MINEA) published a report presenting evidence of mining activity inside CNP, affecting approximately 252 hectares, an uncontrollable situation for the environmental authorities. The report states that this mining activity is taking place next to the aforementioned area, in the indigenous communities of Kavanayén, Wonkén and Arabopó.

Based on its analysis, this report mentions that the growth during the last 10 years (2005-2015) had been dramatic. The report also alludes to the fact that the impact of mining activity has been not only environmental, but also social and economic. Furthermore, it has resulted in a reduction in tourism and has had detrimental effects on the health of the indigenous and Criollo populations (MINEA, 2015). This report highlights the identification of threats such as: the contamination of the water and the soils by waste products from mining operations, the loss of topsoil, the illegal removal of fauna and flora, wildfires, the decrease in the quality of life of the indigenous people, uncontrolled tourism, and the absence of any park management. Although both studies have flaws in their quantitative estimates of the impact of mining due to errors in their methodology, their value lies in the evidence they have presented regarding problems derived from mining activities.

SOSOrinoco (2018) conducted a general assessment of CNP to identify illegal gold mining sites and provided a detailed analysis of the areas through the use of satellite imagery provided by the TM+/OLI 8 and Sentinel 2 sensors, both of which have high spatial resolution. All imagery is freely available through the platforms of Google Earth Pro, the United States Geological Service (USGS) and the European Space Agency (ESA) for analyzing the years 2017 and 2018.

A recently published update of SOSOrinoco 2018's report (SOSOrinoco 2020) estimates that 70% of Caroní river, that is a major geographical boundary of PNC, could be polluted with mercury. Considering that there are 7,680 ha of gold mines operating adjacent to the boundaries of PNC, and applying a special spatial analysis model (Markham and Sangermano, 2018), it is concluded that 22,481 ha of ecosystems inside PNC are vulnerable to adverse impacts (SOSOrinoco, 2020).

The area occupied by current mining activity within CNP is 521 hectares, which represents a relatively small proportion of the park's surface area (0.018%) but is significant considering that the impact from mining is not limited to the surface area at the individual mine sites. Also the latest update suggests that this might be underestimated due to methodological reasons and that the real area could reach 732 ha (SOSOrinoco, 2020). Each mining site is adding large amounts of sediment and pollution to the rivers and bodies of water in general. The environmental and social impacts of mining on tropical ecosystems are well known and numerous (see Fig. 6 for a summary of the impacts related to CNP). Other problems of interest, which are fundamental and indissoluble from mining, are the violence and organized crime that make these operations possible.

In the state of Bolívar, mining activity is conducted by five main actors: politicians, the military, non-indigenous miners, criminal gangs, and indigenous people (SOSOrinoco, 2018, 2020). Among these actors, the biggest losers are the Pemón indigenous people, who have been the victims of sieges, massacres, violence, and the breakdown of their traditional social organization, and at times they are forced to abandon their territories for having resisted the government's policy of promoting mining and other extractive operations. This policy is the source of sustenance for a dominant regime that systematically violates human rights, a

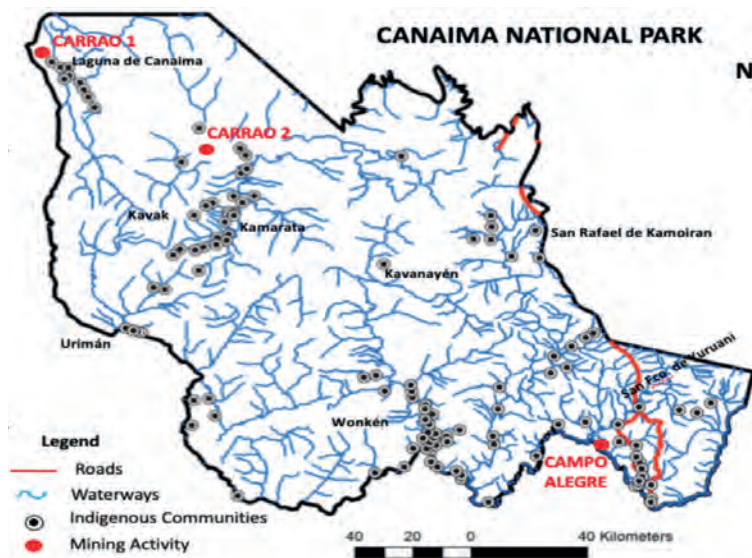
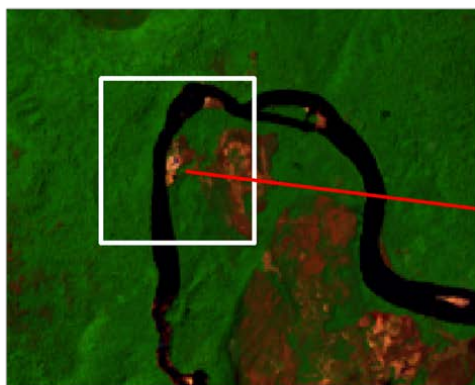


Fig. 5: Relative proximity of mining sites to roads or rivers, and identification of mining sites using satellite imagery.

Map and graphics: SOS Orinoco

Name of the Mine: Río Carrao 1
Geographical Location (UTM Zone 20, WGS84): x= 509320; Y= 698658

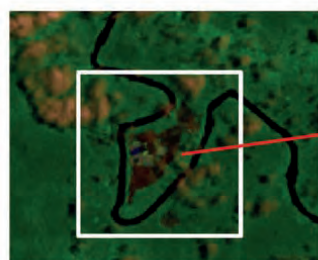


Landsat-8 Image (2018)



Google Earth Image (CNES/Airbus and Digital Globe 2018)

Name of the Mine: Río Carrao 2
Geographical Location (UTM Zone 20, WGS84): x= 574486; Y= 660259

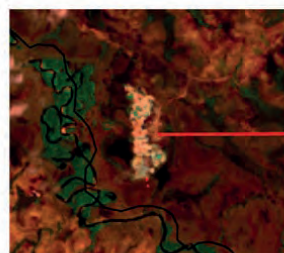


Landsat-8 Image (2018)

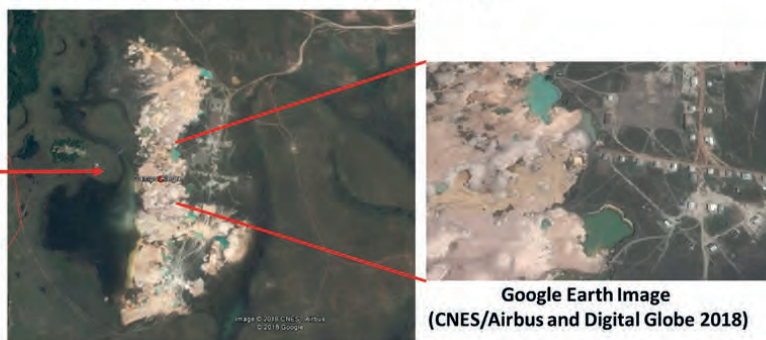


Google Earth Image (CNES/Airbus and Digital Globe 2018)

Name of the Mine: Campo Alegre
Geographical Location (UTM Zone 20, WGS84): x= 699338; Y= 544957



Landsat-8 Image (2018)



Google Earth Image (CNES/Airbus and Digital Globe 2018)

Settings	Impacts
Ecological	Destruction of the ground surface Destruction of ground-covering vegetation Creation of artificial bodies of water in which disease-carrying insects proliferate. Sedimentation in natural bodies of water Severe alteration of physiochemical parameters of waters Alteration of plankton and nekton communities in rivers Alteration of benthic communities in rivers Destruction of natural lentic bodies of water (lakes, bayous) Alteration of river morphodynamics Chemical contamination of bodies of water, with mercury and human waste. Increased deforestation in adjacent areas Increase in brush and forest fires.
Biodiversity	Extinction of local fauna due to hunting Depletion of native plant communities.
Scenery	Damage to and deterioration of scenery
Pemón - Social	Confrontation between communities Discouragement and loss of tourism Greater dependence on the <i>Criollos</i> (Venezuelans of Hispanic cultural heritage) Economic diversification at a minimum Increased deforestation Loss of cultural identity Breakdown of traditional social structure. Greater incidence of insect transmitted diseases Mercury poisoning. Transculturation. Crime. Violence.
Institutional	Adequate environmental management has become impossible Inefficient performance by environmental management entities

Fig. 6: Social and environmental impacts of mining activity.

matter that has been acknowledged by the United Nations (Vitti, 2018), and that has significantly worsened in the last two years, especially for indigenous communities living inside PNC (SOSOrinoco, 2020).

A recent investigative journalism account (Boon and Meléndez, 2019) reported the presence of 20 mining rafts only 23 km away from Angel Falls: 14 of these rafts were in the Arenales Sector, 5 along the Carrao River, and one at Akenan. Also discovered was a criminal network linked to a businessman responsible for building an illegal tourist facility in the heart of CNP, which also serves as the center of operations for illegal mining activities. The largest mines inside PNC are near the southern border of the park, the Campo Alegre complex mines, reaching 293 ha (SOSOrinoco, 2020).

Recommendations

It has been sufficiently demonstrated that CNP is under siege as a result of the rapid growth of mining activities, and that there is no interest in responding to this problem effectively, nor any official environmental authority willing to do so. In recent months, there has been an increase in violence in and around CNP, all of it related in one way or another to mining activities (Comisionado para la Organización de las Naciones Unidas, 2019; SOSOrinoco, 2020). There is evidence that mining activity is still rampant and increasing inside CNP, even within the current framework of political agreements between the government and some indigenous leaders. In this context, it is absolutely impossi-

ble to protect, in an effective way, the attributes that identified CNP as a World Heritage Site in the first place. Support from the indigenous Pemón population is indispensable for saving this World Heritage Site from the ravages of the mining operations.

Without a doubt, there is a need to reclassify Canaima National Park as being “in critical danger,” considering the conservation perspective mentioned by Osipova et al. (2014). Furthermore, bearing in mind the increasingly complex humanitarian crisis that Venezuela is experiencing, and the State’s policy of openly supporting the mining operation, even with the support by some indigenous communities, while disregarding its environmental obligations, it becomes necessary for UNESCO to include CNP on the List of World Heritage Sites in Danger, as a political action that would encourage the authorities to act decisively and assertively toward the cessation of mining operations inside the boundaries of CNP. Only in this way will it be possible to generate the international support required for getting the Venezuelan State to reverse these threats, eradicate the mining activity, and achieve sustainable governance together with the indigenous peoples, which would allow for the conservation of the attributes that justified the designation of Canaima National Park as a World Heritage Site.

References

- Boon, L., and Meléndez, G. 2019. Canaima el paraíso envenenado por el oro. Investigative journalism report published in association with: Runrun.es, Alianza Rebelde Investiga (ARI), El Pitazo and Tal Cual. Available at: <https://alianza.shorthandstories.com/canaima-el-paraíso-envenenado-por-el-oro/index.html>
- Comisionado para la Organización de las Naciones Unidas. 2019. Informe sobre la situación del Arco Minero y la emergencia humanitaria compleja
- MINEA. 2015. Bases para la Propuesta Decreto del Plan de Ordenamiento y Reglamento de Uso del Parque Nacional Canaima.
- Novo Torres, I. and Díaz Martín, D. 2007. Informe Final de la Evaluación del Parque Nacional Canaima, Venezuela como Sitio de Patrimonio Natural de la Humanidad. As a part of Proyecto Mejorando Nuestra Herencia en Canaima. VITALIS, INPARQUES, University of Queensland, UNESCO, UICN. Caracas, Venezuela. 127 pp.
- Osipova, E., Shi, Y., Kormos, C., Shadie, P., Zwahlen, C., and Badman, T. (2014). IUCN World Heritage Outlook 2014: A conservation assessment of all natural World Heritage sites. Gland. Available at: <https://portals.iucn.org/library/sites/library/files/documents/2014-039.pdf>
- SOS Orinoco 2018. Situación Actual de la Minería Aurífera en el Parque Nacional Canaima: Sitio de Patrimonio Mundial en Venezuela. Available at: <https://drive.google.com/file/d/1yUz481b3eBT1e4iCsPuQqCQYsvDiAWs/view?usp=sharing>
- Sosa, A. 2010. The Use of Remote Sensing in Detecting Land Use and Land Cover Changes Resulting from Mining in Canaima National Park (Venezuela). Master Thesis. University College Dublin. Dublin, Ireland. 95 p.
- Vitti, M. 2018. Una Mirada Estructural del Megaproyecto Arco Minero del Orinoco. Revista SIC, Centro Gumilla. Available at: <https://revistasic.gumilla.org/2018/una-mirada-estructural-del-megaproyecto-arco-minero-del-orinoco-1/>

Poaching and Logging in Sagarmatha National Park

Lax Man



Fig. 1: The Khumjung area near Kyangjuma. Note the steep forested slopes.

Photo: Pawel P.

along with the National Park, decides time and period of opening woods and forests for local people to collect dead wood, and the *Lotok Nawa* decides the time and period to make the farmers move their cattle to the higher pastures after the local people have completed farming activities. They have been working for a long time effectively for the preservation of the forest and the protection of farmed fields from animals.

However, because of the lack of knowledge and education, sadly they didn't take part in the protection of wild animals. Even if they didn't formally form a special committee to protect wild animals, they always had respect towards them as

Sagarmatha National Park is one of the ten National Parks in Nepal. It was established in 1976 with great effort by Sir Edmund Hillary and the government of Nepal to preserve biodiversity, different plants and the unique Sherpa culture within its boundaries. In 1979 it was inscribed in UNESCO's World Heritage list for their majestic mountains and deep valleys, dominated by Sagarmatha (Mt. Everest), the highest peak in the world. Many rare and endangered animals are found in the Park.

Before the National Park was established, the Sherpa people had practiced the traditional *Nawa* system to preserve their natural resources which is still in practice. *Nawa* is the committee of local people who are locally and culturally authorized to work in the field of preservation in their particular village. *Nawas* are generally categorized as *Shingi Nawa* and *Lotok Nawa*. *Shingi Nawas* are responsible for preserving woods in and around their community while *Lotok Nawas* are in charge of protecting harvested fields from animals. The *Shingi Nawa*,

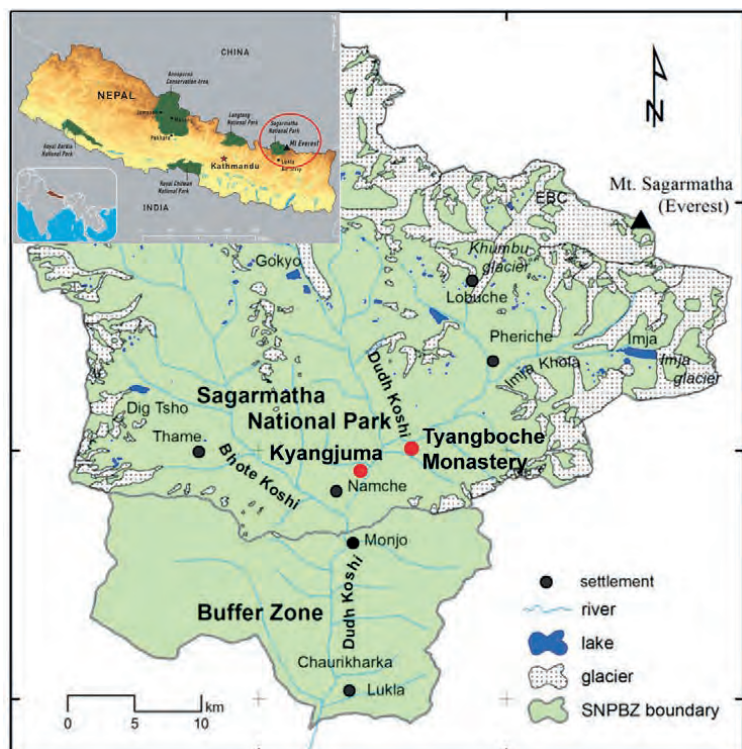


Fig. 2: Sagarmatha National Park.

Map: www.file.scirp.org / Stephan Doempke

they consider many animals as associates of their protector deity, *Khumbi Yula*. As the majority of inhabitants in the National Park area are Sherpa, followers of Tibetan Buddhism, they are naturally against killing, slaughtering and poaching animals, and deforestation. They have been very active especially to preserve the forests. There are still some particular forest areas which are locally known as *Gombi Nati* which are well preserved and protected by monasteries and nunneries, and locals have great respect towards such areas as they have strong religious faith and are not allowed to collect wood from those forests.

Sherpa, who are said have migrated from the Kham region of Tibet some centuries back, and have lived in the Khumbu area ever since, are the major group of inhabitants of the area. They practice Tibetan Buddhism and have great respect towards the monasteries (*Gomba*), Lamas (abbot of monasteries) and their teachings. Lamas also protect certain forested areas which are known as *Lami Naati* which are also not open for collecting wood. The juniper forests around Pangboche monastery is believed to have sprout from the hair of Lama Sangwa Dorji, the founder of Pangboche monastery and hence holy for local people as the forest around the Khumjung, Chyarog, Kyarog and Thame monasteries.

Illegal logging authorized by the Park administration

The constitution of Nepal has endowed authority in the field of conservation to the National Parks. However the constitution at the same time has stated that the National Park must inform the Local Government in cases of construction and conservation. It is definitely sad news for all true conservationists of the world that SNP seemed to be irresponsible – careless and negligent – about giving permission to cut more than two dozen of Himalayan sliver fir and juniper trees about 200m below the sacred Tyangboche



Fig. 3: The site of fresh logging.

Photo: Lax Man



Fig. 4: Fresh logs for a new guest house.

Photo: Lax Man

monastery without even informing the local government and the buffer zone of SNP. The area where the trees were cut had been well preserved for a long time.

It is known that the National Park gave permission to cut the trees for the construction of a guest house in Tyangboche which is owned by the SNP itself. The local people get permission to cut only 3 trees for a house construction from a specific area determined by the National Park. Thus the National Park which is said to work for the preservation and conservation is proved to be the lead force of deforestation and destruction.

Animal poaching

The local government, buffer zone chairperson and several local people, having received information from a woman from Khumjung who went down to collect bamboo in the early early morning for an annual *puja* ceremony, inspected the jungle about 150 meters down from Kyangjuma. The team was assisted also by 14 army personnel and 8 game-scouts from SNP.

The information from the woman was that she saw several animal traps around the area where she went to collect the bamboo. The local government took lead, informed the SNP, and the army went down to the area with the woman who saw the trap and found another 54 traps, 7 dead (poached) Himalayan Musk deer¹ and a Himalaya griffon² in a deep gorge of the Imja river below Syangboche. This is the worst case of wildlife poaching which ever happened in SNP (see photographic documentation at the end of this article).

It was concluded that for such a high number of traps there must have been at least five or six poachers, and this must be an organized group with ties to smugglers. A suspected poacher from the Sankhuwasawa district



Fig. 5: Local people meeting with SNP staff in Namche Bazaar. Photo: Lax Man

was arrested near Phortse by the Army of Dole Post and Fungi Thenga Post on 10 March 2020. He was handed over to SNP and was later released without any punishment by the SNP. The local people were not happy with it. Now the question from the local people is that when a woman could inform about such a heartbreaking scene, why can't the SNP, which has more than 45 game scouts whose major job is to preserve wildlife? Is it not their responsibility to patrol the animal habitats regularly? The cries of help from these Musk deer and eagles caught in traps must be haunting them. If the game scouts are not enough in number for this purpose, why don't they mobilize the army? The army has more than 180 personnel, and the Park has the legal authority to mobilize them when required.

The Park is failing its duty

A big question has been raised among local people and the rest of the world: IS SAGARMATHA NATIONAL PARK REALLY IMPORTANT? Almost 99% of the local inhabitants in the National Park area are dissatisfied with the activities that the National Park carries out. Local people can better work in the field of conservation and protection as they have true feelings towards it than any corrupt government clerk.

Poaching in the National Park is not a new phenomenon. Several cases of poaching of Musk deers and Himalayan monals has been registered in the Park. However, the poachers were later released without any concrete punishment, and that encouraged them to continue poach-



Fig. 6: Young men from Khumjung inspecting the jungle near Kyangjuma. Photo: Lax Man

ing. There are several cases of local people arresting poachers and handing them over to the National Park as they don't have the legal authority to punish them but, as the Park released them without strong punishment, locals were not happy with it.

The poaching that took place recently about 150 m below the main Everest trail proved to a big tragedy for all



Fig. 7: Villagers from Khumbu protesting against poaching and the inactivity of the SNP. Photo: Lax Man

Khumbu people. This case annoyed them and made them raising their voice against such a miserable incident. It was good that most of the youngsters were in the village as this sad incident happened during the lockdown period. The local government motivated and mobilized them to go for an investigation of the recent poaching. They worked so hard and seriously along with the local government that they arrested three suspected Rai people (non-local inhabitants) from Phortse who eventually proved to be poachers and had been engaged in poaching for long time. They however denied their involvement in their recent case. They

seem to have a big chain of such criminals from different places from Khumbu who live there hiring and operating lodges, shops and inns.

The locals have handed them over to the National Park and are all very hopeful that this time the authorities will seriously conduct an investigation of their activities and punish them as the constitution of Nepal states for such crimes. Our goal is to cease poaching permanently from the National Park by eradicating its root profoundly. Our objective is also to let all the animals live their life with their own right.

Annex: A letter to the Chief Conservation Officer of SNP

by Dawa Nuru Sherpa of Khumjung

Chief Conservation Officer

You came to be the Chief Conservation Officer of this Everest National Park. I am convinced that thousands of locals in the Nikunj area like me are proud to hear the name of your verse, because the literal meaning of your verse is enough to make you the head of conservation. In simple language, your positional responsibilities and rights include the protection of forests, the protection of wildlife, and the protection of religion and culture within your geographical area.

The animals that rejoice in the forest are as dear to conservation officers as you are to your own family members. You have proved this when a resident of Sankhuwasabha who came to Dole Army Post Pari with the intention of hunting musk in the forest a month ago, was handed over to you for legal action against the poachers caught in a joint effort of the army and the locals.

The fact that you are the father of the protection of the forest has been proved by the deforestation between Tengwoche and Fangi Thenga. I am also one of the thousands of eyewitnesses who have seen cut down dozens of trees and cut down timber in the forest, which has been banned

for decades from Laushasha to the west. It is learned that the timber cut between Fangi Thenga and Tengwoche was transported for the maintenance of a hotel owned by Nikunj in Tengwoche.

Perhaps seeing the painful condition of the trunks of these torn trees, the corpses of seven musk deer trapped in the forest below Kyangjuma and the corpse of an eagle are begging you for protection. But you have not been able to become the guardian of the wildlife or their habitat in the forest. Your verse is not worth listening to. However, in the name of a protection officer like you, what the scoundrels do is to protect the smugglers under the cover of protection.

Now the locals are hot. You are an employee in a dignified position, so you may be aware that your position is not more powerful than the public voice. If you can't carry out your post responsibilities, the locals will now take the responsibility of protection. We could not come to welcome your arrival with flowers. Now we will gather in thousands as a farewell gathering with vermilion black garlands and shoelaces. The obscene faces of those involved in deforestation and poaching are being identified by time. Everyone will be held accountable by the locals. Jadau ...³

References

- 1 The Himalayan musk deer is listed as an endangered species by the IUCN, and is prized for the musk pouch found in the male of the species which fetch thousands of dollars in China and Korea, where they are used in traditional medicine, perfumery and cosmetics.
- 2 The Himalayan griffon, the biggest vulture outside the Americas, is listed as Near Threatened by the IUCN.
- 3 Translated from Nepali through Google Translate, and edited by the editor.

Photographic Documentation: Poaching in Kyangjuma, April 2020

Photos: Lax Man



Fig. 8: A poached Musk deer.



Fig. 9: Decomposed poached Musk deer



Fig. 10: Confiscated corpses of poached Musk deer brought to the SNP Office. Note also the trap wires.



Fig. 11: Poached Musk deer.



Fig. 12: Wire trap on the spot of the crime.



Fig. 13: Trap with decomposed Musk deer.



Fig. 14: Poached Himalayan griffon.

III. Cultural Landscapes and Mixed Sites

Kujataa – A Property Surrounded by Mining Projects

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



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

Photo: Kommune Kujalleq, Birger Lilja Kristoffersen

No or few World Heritage Sites probably have more or bigger mining projects in their vicinity than the Kujataa UNESCO World Heritage Site (WHS) in Southern Greenland. The property¹ was inscribed on UNESCO's world heritage list in 2017. It comprises a sub-arctic farming landscape consisting of five components that represent key elements of the Norse Greenlandic and modern Inuit farming cultures. On one hand they are distinct, on the other they are both pastoral farming cultures located on the climatic edges of viable agriculture, depending on a combination of farming, pastoralism and marine mammal hunting. The landscape constitutes the earliest introduction of farming to the Arctic.

Some of the world's biggest mining projects are located near Kujataa

Kujaata is situated in Kommune Kujalleq, the southernmost and smallest municipality of Greenland with its rich mineral resources. These include zinc, copper, nickel, gold,

diamonds and platinum group metals, but first and foremost substantial deposits of rare earth elements (REEs) and uranium. Greenland is estimated to hold 38.5 million tons of rare earth oxides, while total reserves for the rest of the world stand at 120 million tons. Furthermore, Greenland has some of the world's largest undiscovered oil and gas reserves and could develop into the next environmental frontline – not unlike the Amazon Rainforest in South America.

Some of the biggest REEs mining projects in the world are located only a few kilometres from the Kujataa WHS. The biggest and most controversial is the Kvanefjeld REEs-uranium mining project, owned by the Australian company

Greenland Minerals Ltd., GML. According to GML, in addition to containing the second biggest uranium² 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, and only six kilometres away from Narsaq, a town of approximately 1,500 inhabitants, and also near some of the parts of the Kujataa WHS.

A second major project close to Kujataa is the Kringlerne REEs mining project, which is described by its owner, the Australian mining company Tanbreez Mining Greenland A/S, as the probably largest deposit of REEs in the world³. In 2013, the Greenlandic government estimated that Kringlerne contained more than 4.3 billion tons of ore⁴. The minerals will be extracted from two open pits at high altitude⁵. A third substantial project is the Motzfeldt Sø REE mining project⁶, which is part of the Motzfeldt Centre and owned

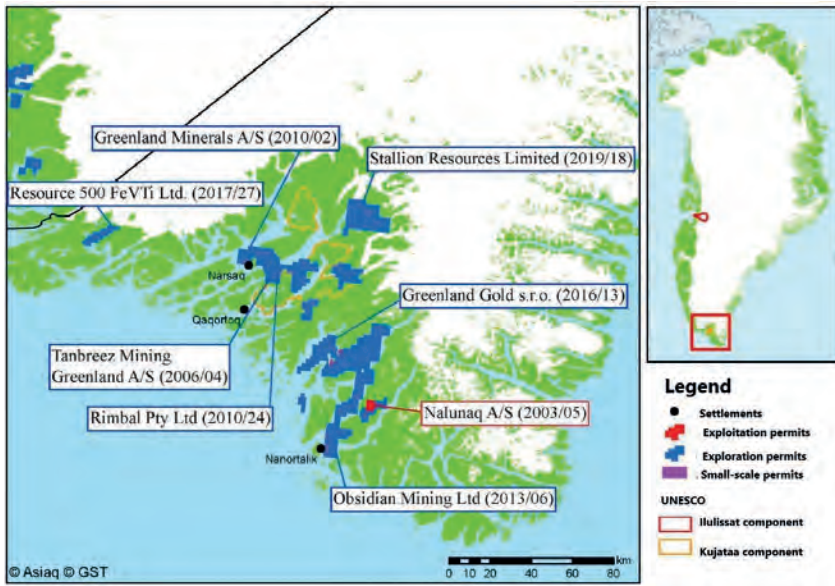


Fig. 2: Mining activities in Greenland 2019, Kommune Kujalleq. The map shows exploration and exploitation permits in Kujalleq Municipality. The red colour signifies exploitation permits, the blue colour exploration permits and the black colour towns. Map: Mineralaktiviteter i Grønland 2019, Råstofstyrelsen

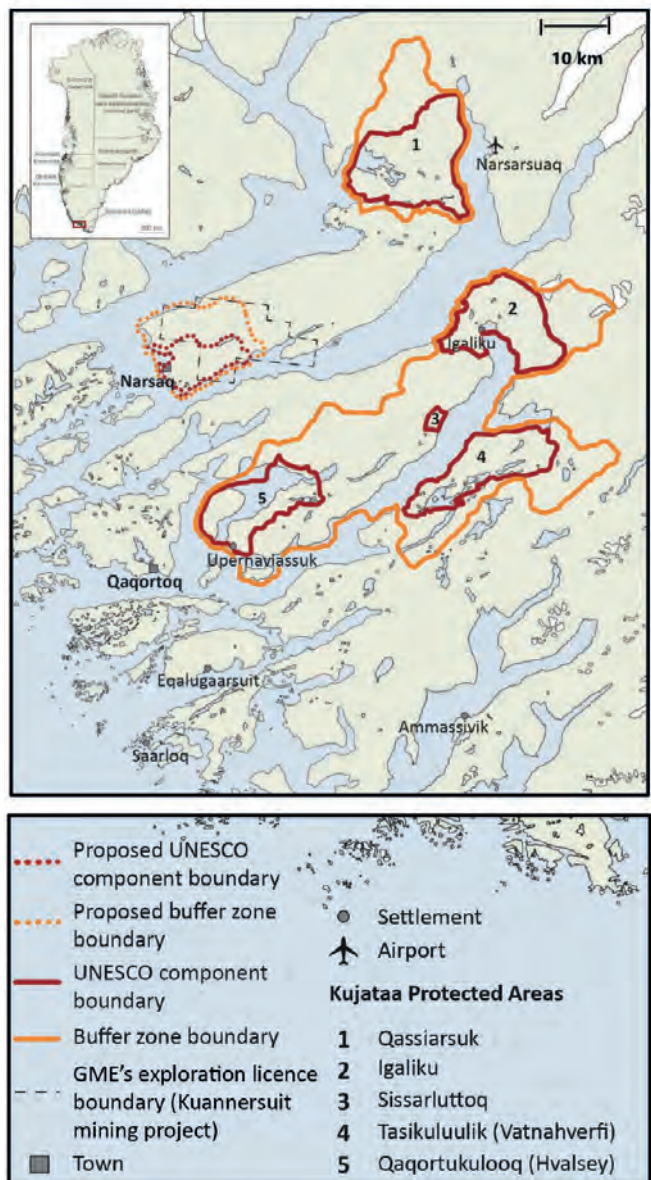
Fig. 3: The UNESCO Kujataa world heritage areas and the proposed enlargements. The proposed UNESCO component boundary has been established in view of the density of unique sites. It integrates both identified sites of vestiges from Norse agriculture (Landnamsgården at South of Narsaq and Narsap Ilua 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). Comments and map: Marine Duc, 2018 / WHW

by Tanbreez’s parent company, Rimal Pty Ltd. So far, not much is known about this project. After years of delays, decisions on whether to grant the owners of the Kvanefjeld and Kringleerne exploitation licenses are expected to be made by the Greenlandic government later in 2020. Public hearings on the projects in the last phase of their EIA processes could start at any time⁷.

Kvanefjeld – a contentious mining project

The plans for the Kvanefjeld mine started more than sixty ago, not in Greenland, but in Denmark, when its uranium deposit was discovered and further explored by the Danish Nuclear Energy Commission. After the Danish rejection of nuclear power and the decision in 1988 by the Joint Committee on Mineral Resources in Greenland not to issue permits for uranium exploration and extraction, the Kvanefjeld project was off the political agenda for many years. This changed in 2008, when Kvanefjeld’s owner, GML, decided, that the company wanted to mine not only REEs, but also uranium. If it did not get permission, it would abandon the project⁸.

From being perceived as a conspicuous example of Danish colonialism, Kvanefjeld was now marketed as a means of economic independence from Denmark. It has since become clear though that more oil and minerals extraction is not a real prerequisite for financial autonomy. In 2014, a study⁹ was published by the University of Copenhagen and Ilisimatusarfik, the University of Greenland. It concluded that 24 concurrent large-scale mining projects would be required to zero out the financial support from Denmark. The report also established that a mineral-based economy is not economically sustainable: when the mining industry started



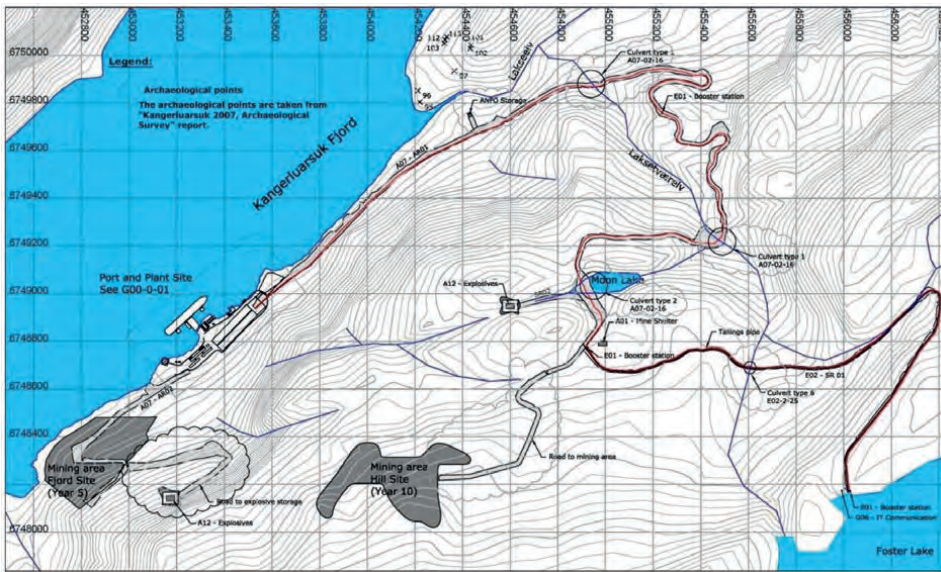


Fig. 4: Description of the overall design for the Kringlerne mining project with two open pit mining sites, tailings deposition in Fostersø (Foster Lake) and the crusher, separator and all other facilities located at the fjord. The mining project is located very close to the Kujataa WHS, but appears not to have been taken into consideration in the Kujataa WHS management plan.

Map: Tanbreez Project, EIA, August 2013

nomination to the World Heritage Tentative List¹².

Kujataa’s OUV under threat

to recede, Greenland would find itself in the same situation as before, only with fewer resources. These findings have since been confirmed by other reports¹⁰.

Calls for enlargement of the Kujataa WHS

Especially in Southern Greenland, there has long existed a notion that the Kujataa World Heritage Site in its present form has been delineated to accommodate the Kvanefjeld mining project and that the potential impacts of the other mining projects surrounding the site have not been considered. In March 2018, responding to call for submissions by Greenland’s Ministry of Education, Culture, Research and Church and the Danish Ministry of Culture’s Agency for Culture and Palaces, The URANI NAAMIK/NO TO URANIUM Society in Narsaq proposed that Kujataa should be extended to include large parts of the Erik Aappalaartup Nunaa Peninsula (or the Narsaq Peninsula), which should be entered into Greenland’s World Heritage Tentative List. Subsequently, Narsaq Museum’s curator recommended that Landnamsgaarden and Dyrnæs Church near Narsaq should be recognised as world heritage and in a letter to URANI NAAMIK, Greenland National Museum and Archive mentioned the big Northern Farm in Narsaq as a possible world heritage prospect¹¹. Generally, the proposed sites meet a wide range of selection criteria for

It is also clear that Kujataa’s Outstanding Universal Value, i.e. its exceptional cultural and natural significance, will be under treat if the mining projects surrounding the site are implemented. There have already been calls to put Kujataa on the World Heritage Convention’s danger list. Kujataa’s unique farming traditions have been a determining factor in designating it as world heritage. However, the Danish Risø National Laboratory has estimated 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

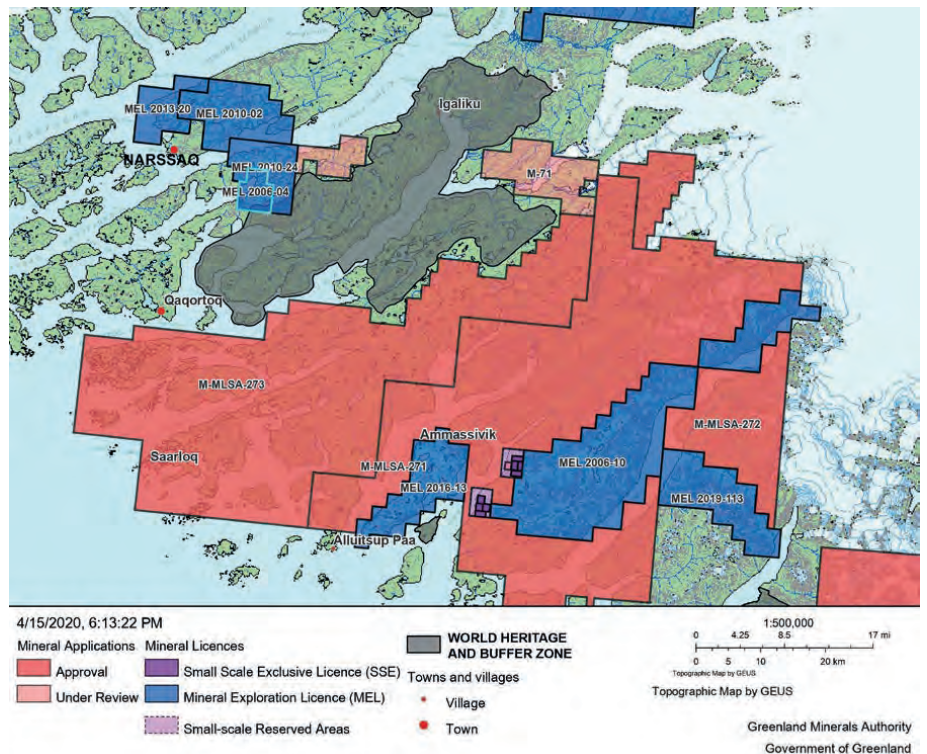


Fig. 5: Mineral licenses in Kommune Kujalleq in April 2020. Strategic environmental impact assessments of minerals exploration areas are not mandatory, which means that the public is not informed in advance on what areas could be designated. The government just has to give an annual account of the permits that have been granted.

Map: Greenland Minerals Authority, April 2020 / Andrea Martinez

stock and waste rock piles¹³. 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 dust from the afore-mentioned sources will be carried by heavy arctic sea winds across the region, where it will affect among others agricultural activities. The predominant wind direction and the direction for the strongest winds are east- and north-eastwards, where the Kujataa WHS is located. The area, its people, domestic animals and wildlife would be chronically exposed to radioactive and other toxic species via drinking water, food and air¹⁴.

Furthermore, most if not all the planned mining projects in the area are open pit mines. Perpetual blasting with explosives on the mountain tops in the open pit mines surrounding the world heritage site and the excavation and transport by dump trucks to the mills, where the rocks are crushed, could cause considerable noise disturbance during the entire operation of the mines.

According to the EIA draft reports for the Kvanefjeld project, a dilution factor in the order of 2000 for the waste water would be required to be rendered safe for the most critical parameters. This would mean that the discharges of waste water during just one year would have to be diluted into 7 km³ of seawater in the Fjord system, which is part of the Kujataa World Heritage Site, and into 260 km³ of seawater during the planned operational lifetime of the Kvanefjeld mine. Furthermore, seepage, leaks and spills of liquids from the tailings 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 Fjords and the coastal sea¹⁵.

Large-scale mining and particularly uranium mining are incompatible with the development of three of the four sectors of the farming landscape, namely fishing and catching, tourism and food production. It is relevant to ask how the entire character of the landscape would change in the development from a rural to an industrial area in the wake of both the big mining projects. This also pertains to the question of urban development, when among others new ports, port facilities and accommodation villages have to be built and corresponding support infrastructure implemented.

No real plans to protect Kujataa

In addition to having already ignored the threats to the Kujataa world Heritage Site, there is little indication that the Greenlandic and Danish authorities intend to protect the property in the future. It is currently governed and managed by a steering group with 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. Although it is acknowledged that the site is vulnerable, it is assumed that the buffer zones are enough to protect the integrity of the property. However, since the current management plan¹⁶, which barely touches on the mining issues, was written in 2016, the number of exploration licenses in the region has exploded.

Furthermore, in its description of the impacts of the nearby mining activities, the management plan relies on a draft of an Environmental Impact Assessment (EIA) of the Kringlerne mining project¹⁷, which was rejected by Greenland's Environmental Agency for Mineral Resources Activities (EAMRA), because it did not contain enough relevant information. EAMRA has also rejected the four latest EIA draft reports on the Kvanefjeld project because of lack of information. Among other things, Kvanefjeld's owner, GML, is criticised for not providing a comprehensive assessment of the earthquake risk in the region, final results of tests of toxic elements during extraction and processing, final radiological estimates and results of investigations of impacts of radioactive minerals, and for failing to describe the alternatives regarding management of tailings and the shutdown of the tailings facility¹⁸. In September 2019, the CEO of GML was also formally reproached by Greenland's Prime Minister and the Department of Nature and Environment's Permanent Secretary for lobbying high-ranking civil servants and ministers who had no competence within the EIA review process in order to undermine EAMRA's authority¹⁹.

A Heritage Impact Assessment is not enough

In December 2018, the Minister of Mineral Resources and Labour was asked by a member of the Parliament whether the government would carry out a Heritage Impact Assessment (HIA) of the Kvanefjeld mining project and not make a decision on licensing the project, before it had been presented to UNESCO for an evaluation. The Minister responded that the government would not take a position on this question before a valid exploitation application had been made by the owner of the project²⁰. This is also an issue in regard to the other big mining projects in the region, because any realistic HIA of Kujataa would need to assess the cumulative effect of the mining projects in the area. However, it could be argued that there is already enough reason for the Greenlandic and Danish States Parties to involve UNESCO and – considering that environmental issues are at the core of the problems and Kujataa's management plan is based on rejected EIA draft reports – to include IUCN in the process.

However, the biggest problem for not only Kujataa, but all Greenland's three world heritage sites could be the fact that Greenland's environmental legislation does not man-

date strategic environmental impact assessments for minerals exploration areas, which means that the public is not kept informed in advance on what areas could be designated. Thus, implementation of the Aarhus Convention in Greenland should have high priority in order to reinforce Greenland's environmental legislation²¹.

References

- UNESCO, Kujataa Greenland: Norse and Inuit Farming at the Edge of the Ice Cap (2017), <https://whc.unesco.org/en/list/1536/>
- GMEI Company Presentation, Symposium Investor Roadshow, Slide 5 (April 2014), <https://www.slideshare.net/SymposiumEvents/greenland-minerals-and-energy-company-presentation-symposium-investor-roadshow-april-2014>
- Homepage, Tanbreez: <http://tanbreez.com/en/project-overview/key-project-features/>
- 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-jorn-skov-nielsen.html>
- Tanbreez Mining Greenland A/S, Tanbreez Project, Environmental Impact Assessment (August 2013), <https://naalakkersuisut.gl/~media/Nanoq/Files/Hearings/2013/Tanbreez/Documents/EIA%20MainRepor%20Eng.pdf>
- Geological Survey of Denmark and Greenland, GEUS, The rare earth element potential in Greenland. *Geology and Ore*, No. 29 (February 2018), <https://eng.geus.dk/media/16302/go29.pdf>
- Press release, Naalakkersuisut, Progress on two rare earth projects in South Greenland (March 18, 2020), https://naalakkersuisut.gl/en/Naalakkersuisut/News/2020/03/1803_tanbreez
- Ajaa Chemnitz Larsen and others, Uranium in Greenland: Risky business, Feature article in *Arctic Journal* (February 12, 2016) Originally published in Danish in an abbreviated version by the daily *Politiken* (February 11, 2016), https://noah.dk/sites/default/files/inline-files/160212_Feature%20article%20Arctic%20Journal.pdf
- The Committee for Greenlandic Mineral Resources to the Benefit of Society, To the Benefit of Greenland (January 2014), https://greenlandperspective.ku.dk/this_is_greenland_perspective/background/report-papers/To_the_benefit_of_Greenland.pdf
- Torben M. Andersen og Ulla Lynge, Dystre udsigter for Grønlands økonomi, *kronik i Jyllands-Posten* (September 26, 2014), <http://jyllands-posten.dk/debat/kronik/article7055964.ece>
- NGO press release, Kvanefjeld Mining Project Endangers UNESCO World Heritage Site (August 8, 2018), <https://noah.dk/node/1109>
- 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/>
- 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
- Southern Greenland has the country's richest biodiversity and all of Greenland's farm land is situated in the area, which is often described as "Greenland's bread basket". All of Greenland's sheep stock – more than twenty thousand overwintering sheep – are found in Southern Greenland and there is an ambition to introduce beef and dairy cattle when global warming makes the climate milder. Furthermore, the region has some of the best catch areas: the small Kujalleq municipality alone had almost ninety thousand catches in 2009 and 2010 of birds, land mammals and seals, among others. See: Naalakkersuisut, Departementet for Fiskeri, Fangst og Landbrug: Fangstrapport 2012. Since then, there has not been easily accessible statistics on the subject.
- Jan Willem Storm van Leeuwen, Mining at Kvanefjeld, Comments on: Kvanefjeld Project. Environmental Impact Assessment, Greenland Mineral and Energy Limited Draft, October 2015, prepared by Orbicon A/S (January 22, 2017), https://noah.dk/sites/default/files/2017-03/J.W.%20Storm%20van%20Leeuwen%20paper%20on%20%20Kvanefjeld%20EIA%20draft%202017-1-22_0.pdf
- NGO press release, The Kvanefjeld project does not meet Greenland's Mineral Resources Act's environmental and climate requirements (March 10, 2017), https://noah.dk/sites/default/files/2017-03/2017-03-10%20Press%20release%20concerning%20EIA%20draft%20report%20Kvanefjeld_0.pdf
- See also the latest EIA draft report on the Kvanefjeld project: GHD/Orbicon, Kvanefjeld, Environmental Impact Assessment, Greenland Minerals & Energy A/S (June 2019), <http://www.noah.dk/sites/default/files/inline-files/EIA%20GML%202019%20%5BEN%5D%200.pdf>
- Kujataa Management Plan 2016-2020 (January 2016), http://kujalleq2017.odeum.com/download/forvaltningsplan_kujataa_engelsk_04032016.pdf
- See note 5.
- Kalaallit Nunaata Radioa, Kuannersuit - Greenland Minerals har ansøgt om udvindingstilladelse (July 25, 2019), <https://knr.gl/da/nyheder/greenland-minerals-har-ansogt-om-udvindingstilladelse>
- Naalakkersuisut's decision on GML's complaint against EAMRA. (September 6, 2019), https://noah.dk/sites/default/files/inline-files/Decision_GML_complaint_2019-09-06.pdf
- See also: GML's complaint to EAMRA. (April 4, 2019), https://noah.dk/sites/default/files/inline-files/GML_complaint_2019-04-04.pdf
- For an update on the status of the Kuannersuit/Kvanefjeld mining project, see: Nuclear Monitor: New setback for the Kvanefjeld mining project in Greenland, Issue #879, 04/11/2019: <https://wiseinternational.org/nuclear-monitor/879/new-setback-kvanefjeld-mining-project-greenland>
- Ministeren for Råstoffer og Arbejdsmarked, Erik Jensen, Besvarelse af spørgsmål nr. 2018/305 vedrørende borgerinddragelse og HIA fra medlem af Inatsisartut, Sofia Geisler, 27.11.2018, (December 10, 2018), https://ina.gl/documents/para3637/2018/svar/305_2018_Kuannersuit_SOGEL_svar.pdf
- For more information on Greenland's legislation in this field, see Ellen Margrethe Basse, Juridisk respons 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>

The English Lake District – a Cultural Landscape Under Threat

Fritz Groothues, Louise Dunn, Fiona Campbell and Jon Derry (LakesWatch)



Fig. 1: The Lake District National Park.

Map: Google Maps

One of the reasons for making the Lake District a World Heritage Site is the close link between its landscape and the conservation movement. It is this tradition that local communities expect the Lake District National Park Authority (LDNPA) to respect. After all, conservation was the main reason for the creation of National Parks.

What follows is a shadow State of Conservation report, prepared by the communities who live there and who can testify how the Outstanding Universal Value of a World Heritage Site is being progressively eroded.

4x4s and motorbikes ruining the beauty and tranquillity of the landscape

In previous reports we described how the increased number of motor vehicles on two fell tracks near Little Langdale has blighted the area for walkers, cyclists and horse-riders. The British media reported extensively about the threat to one of the most beautiful parts of the Lake District. A petition asking for Traffic Regulation Orders (TROs) to ban recre-

ational motor vehicles on these green lanes has now been signed by over 350,000 people. The National Trust, the Friends of the Lake District and a number of mountaineering clubs all called for 4x4s and motorbikes to be excluded from the tracks, as have farmers and other local residents.

ICOMOS compiled a detailed Technical Review which the State Party sent on to the LDNPA. It showed how recreational motor vehicles diminish the OUV in a number of ways, in particular through their impact on beauty and tranquillity and on sheep farms. ICOMOS asked the LDNPA to use its powers, namely TROs, to counter these adverse effects.

The LDNPA did not reply to the ICOMOS paper directly. Instead it produced a report for its Rights of Way Committee, the body making the decision on TROs. This report contained a response to ICOMOS from the spokesman of a motoring organisation, which reveals the closeness between the National Park Authority and motorists. The report dismissed ICOMOS' concerns and advocated a 'partnership management' solution, the approach which has been in place for the last 20 years and has led to the current problems.



Fig. 2: Caravans of 4x4 vehicles are a nuisance to those who wish to enjoy the values for which the Lake District was inscribed in the World Heritage List. Photo: Lakes Watch

For the sheep farmers on the tracks this means that the daily nuisance of unnecessary motor vehicles will continue, forcing them to change their farming practices. Walkers and other non-motorised users will continue to be faced with the physical presence, the noise and air pollution of vehicles that make a peaceful, relaxing experience into a stressful one and take away the beauty and tranquillity of this area.

The LDNPA has shown little regard for the views of local communities. By brushing aside the criticism and advice from the World Heritage Centre and ICOMOS it has also demonstrated that it prioritises motorised access over the need to preserve the World Heritage Site.

We are asking UNESCO and ICOMOS to redouble their efforts so that the LDNPA fulfils its most basic responsibilities.

The Keswick to Threlkeld Railway Path

The LDNPA's £7.9M project to restore the Keswick to Threlkeld footpath after damage caused by storm Desmond in 2015 should have been a cause for celebration but has instead angered the local community and many visitors. They object to the plans to lay a 4 mile long, 3 metre wide strip of tarmac through an area of natural beauty and ecological fragility. Keswick Town Council passed a historical and unanimous vote of no confidence in the Lake District National Park Authority, with locals claiming that the plans for the path surface are 'vandalism'. In addition to objections about the aesthetics of the tarmac, regular users of the path have highlighted that an impermeable smooth surface will be hazardous in a wet, shaded, tree-lined gorge. There are also fears that the smooth surface will encourage high speed cycling by a minority. Previously all users co-existed happily on the track.

The LDNPA have further exacerbated the row by failing to engage with the community despite claims to the contrary. Critics of the process point to low awareness and misrepresentation of data collected from a flawed online 'consultation' survey. Complaints and objections during and after the planning process and a petition with over 3,000 signatures have been ignored by the LDNPA who have declared themselves 'unwilling' to reconsider the decision.

Now, close to the 4th anniversary of storm Desmond, parts of the old trail near the town have already been covered in tarmac. Campaigners want the most rural parts of the path – not due to be surfaced until late 2020 - to be covered with a surface in keeping with the existing natural character of the path that is ecologically friendly, suitable for all users and more practical in the woodland gorge setting. Keswick Town Council has proposed Ultitrec, a recycled material which is used in the Monsal trail in the Peak District Na-

tional Park. Objectors are supported by Friends of the Lake District, Cycling UK and the Cumbria Bridleway Society. Complaints to the LDNPA Board, the Department for Rural Affairs, UNESCO and local MPs have been made relating to the destruction of the natural environment, poor community engagement, the provision of misleading information and the misleading portrayal of protestors as anti-disabled or anti-cyclist.

We are asking UNESCO to insist that the National Park must properly engage with the local community and act according to its duties under the World Heritage Convention.

The Honister zip wire

A year ago we noted that various individuals and groups had written to the United Kingdom's Planning Casework Unit to request that the Secretary of State should decide whether or not the 1.2 km zip wire at Honister, should be permitted. The Lake District National Park's Planning Committee, despite being advised by the LDNPA Planners that the proposal would harm the Outstanding Universal Value, approved the zip wire. On the 24th of July 2019 those campaigners who had written to the Secretary of State to ask him to intervene were sent a letter to say that he is 'satisfied that the application should be decided at a local level'. This leads us to the conclusion that the World Heritage Site may not be in safe hands.

Honister Slate Mine sits on the boundary of two Areas of Distinctive Character; Borrowdale and Buttermere. The tiny village of Buttermere comprises two inns, a few farms, a small chapel and some isolated houses. Honister Slate Mine is a working mine and has an extremely unusual concession. The owners of Honister Slate Mine have permission to mine and sell pieces of Fleetwith Pike, an iconic mountain with a dramatic and distinctive outline, at the head of the Buttermere Valley.

Following a long series of applications about the Honister site the planners advised in their 2018 recommendations to the Planning Committee that, 'Despite the weight we have attributed to the identified benefits, they do not in our view outweigh ... the harm to the special qualities and Outstanding Universal Value of the Lake District.' Cumbria Wildlife Trust said that, '...the zip wire will cause significant damage to this internationally important wildlife site and, in particular, to the rare, irreplaceable and endangered alpine flowers that grow here'. Despite the planners' view on the potential harm to the OUV the LDNPA has at no point approached the UNESCO World Heritage Centre. This directly contravenes sub section 172 of the Operational Guidelines of the World Heritage Convention. Given that the impact on the Outstanding Universal Value was clearly highlighted in the planners' report to the Planning Committee, this dev-

elopment should not have been granted planning consent without any reference to the World Heritage Centre.

World Heritage Sites such as the Lake District are cultural properties. For the title ‘World Heritage Site Status’ to have any meaning, Cultural Landscapes must be monitored for their natural as much as for their cultural condition and values.

Gondolas / Cable Cars at Whinlatter Forest

In May 2018 the Lake District National Park Authority (LDNPA) published its ‘Draft Local Plan Review’, a statutory document containing a series of proposed policies for the management of the National Park over a 15-year period. The final draft is currently being considered by UK Government Inspectors (decision expected early in 2020).

The original ‘Draft Local Plan’ envisaged a Gondola cable car (with base station just outside Thornthwaite) to Whinlatter Visitor Centre, then a second to the summit of Seat Howe. Large scale objections led to the removal of the word ‘Gondola’ from the final draft, but Gondolas are still being actively supported by senior management within the LDNPA. The LDNPA and Forestry England (FE) are stakeholders in the ‘Whinlatter Mountain Centre Working Group’ which recently commissioned a Transport Options Evaluation study to consider ‘solutions’ to alleged traffic problems in the Braithwaite ‘narrows’ leading to Whinlatter. 5 of the 12 options under consideration involve Gondolas. Freedom

of Information (FOI) requests have revealed that a Gondola feasibility study was commissioned by the same group in April & May 2018.

There is no significant traffic issue in Braithwaite currently, but FE (supported by the LDNPA) want major development at Whinlatter (accommodation and a variety of new leisure activities) which they estimate will increase footfall from 240,000 per annum to 400,000. This means they are seeking to create a significant traffic problem. In this event, there would be simple ways to control car traffic (e.g. park & ride mini buses). However, the LDNPA is still promoting a Gondola with the erroneous justification that it is a ‘sustainable transport solution’. Aside from its enormous carbon footprint in production / erection, this would create visual, environmental and cultural damage on a large scale and set an alarming precedent.

The World Heritage Centre should be aware that a Gondola is also depicted with the notation ‘Discover new ways to travel’ in the LDNPA’s 30 year ‘Smarter Travel’ document (September 2018); suggesting an aspiration to use gondolas more widely within the Park. Better strategic ways of managing increased visitor numbers are not even mentioned.

The threat of a Gondola to the landscape around Whinlatter and the villages of Thornthwaite and Braithwaite is obvious, not only from the ‘attraction’ itself (two cable car systems with numerous pylons, gondolas and large base stations near Thornthwaite and on the fell itself); but also the associated infrastructure (car / coach park, toilets, cafés at an ‘egress’ station – as described by FE themselves). Such a development would represent a dangerous precedent for



Fig. 3 and 4: Old Railway trail before and after being covered by tarmac.

Photos: Lakes Watch

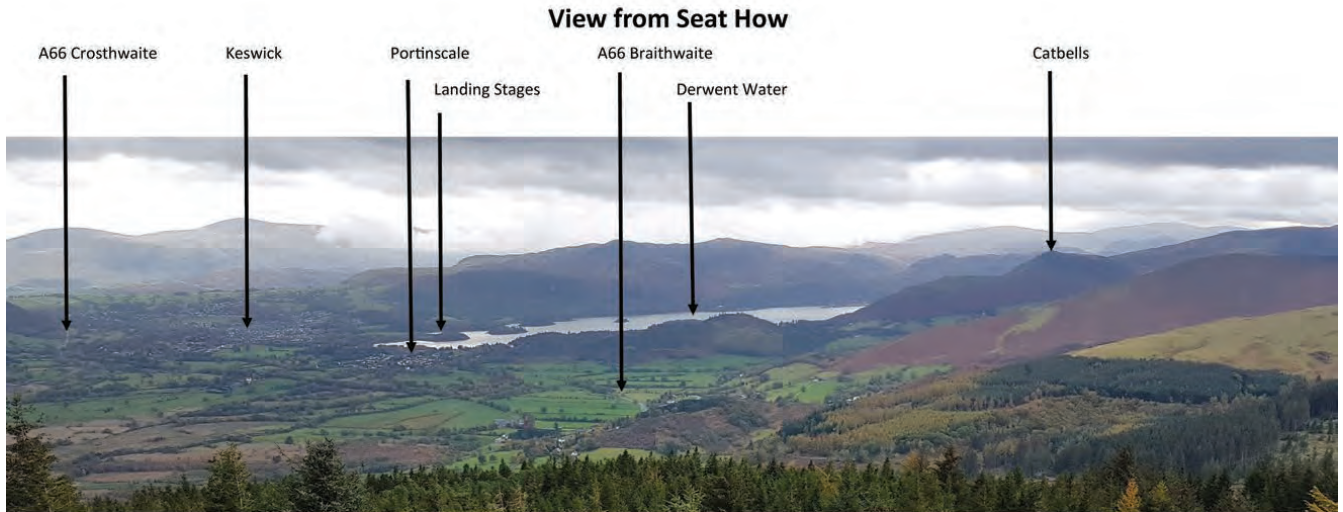
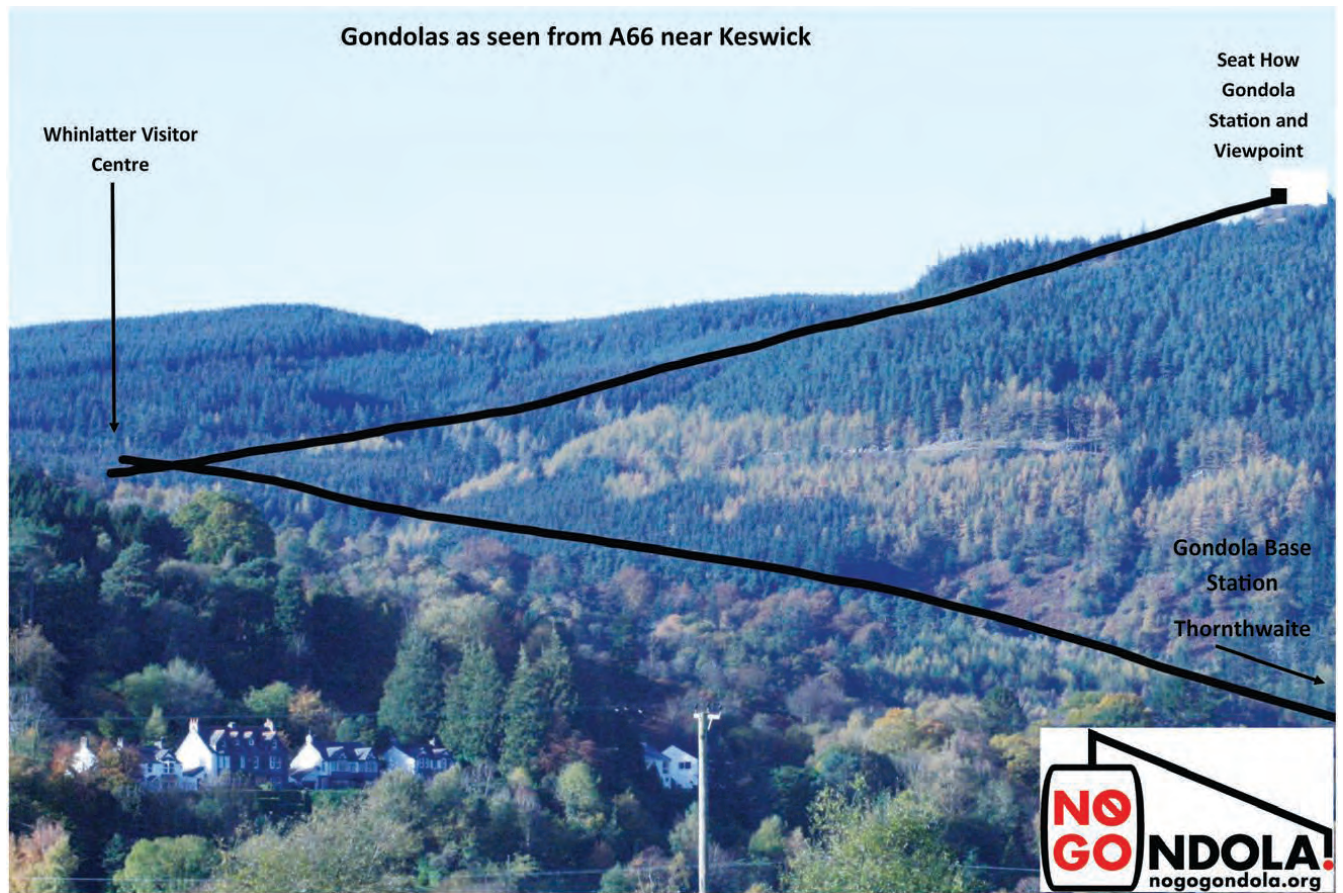


Fig. 4 and 5: Illustration of the gondola route seen from the top and valley stations.

Photos: NoGoGondola



subsequent other 'attractions' whose true motivations are masked by the spurious veneer of 'sustainable transport solutions' given them by the LDNPA.

The earlier feasibility study, the current Transport Options Evaluation document and the Local Plan itself, all indicate that the LDNPA is in contravention of section 172 of the Operational Guidelines for the Implementation of the World Heritage Convention. We urge UNESCO to act immediately before this scheme progresses further.

Conclusion

These examples show that local communities are being ignored and that the National Park Authority is putting the commercial exploitation of the Lake District and access rights of a minority of motorists above the need to protect the OUV.

We urge the World Heritage Centre to scrutinise the National Park Authority's compliance with the key principles of conservation and community involvement.

The World Heritage Upper Middle Rhine Valley Must be Preserved

Elke Greiff-Gossen, BI Rheinpassagen

24 h - Fährre jetzt!
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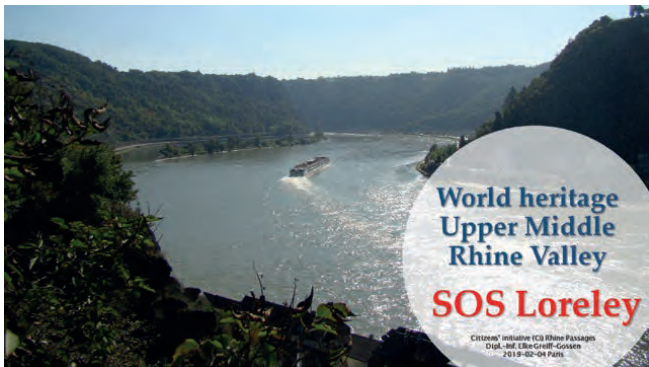


Fig. 1. Loreley rock from St. Goarshausen before the open air stage was redesigned and enlarged. Photo: Elke Greiff-Gossen

The Middle Rhine Valley possesses a unique mix of cultural and natural monuments. These extraordinary features are tangible evidence of geographical and cultural history and display the unwavering connection between culture and nature. Set against this cultural landscape, the Middle Rhine is renowned worldwide.

The river itself, its course, and the scenery dominated by vineyards and dotted with ancient castles and historic places have all played a part in forming this unique landscape. It is no wonder then that in the 19th century, there was a surge in national and international "Rhine romanticism," which continues to determine – consciously or sub-consciously – our emotional attachment to the Middle Rhine as a special homeland.



Fig. 2: The Loreley Open Air Theatre is now visible from a great distance. Photo: Klaus Thomas

For these reasons, the Middle Rhine Valley has become an extraordinary, constantly evolving, and associative cultural landscape (according to the UNESCO concept), which undoubtedly contributes to a sense of identity among the native population as well as the international community.¹

The world heritage is **endangered by**

1. the planned construction of the Middle Rhine bridge,
2. the constant strain and danger caused by rail traffic and
3. the proposed 2029 national gardening show in the Middle Rhine valley.

Threat 1: Middle Rhine bridge – 43 COM 7B.83 point 3

The state government of Rhineland Palatinate is preparing the regional planning procedure for the Middle Rhine bridge. However, alternatives to the Rhine bridge are not investigated despite the Middle Rhine bridge threatening local needs.

With the construction of the Middle Rhine bridge, the initiators are prepared to accept that four ferries will cease operations for economic reasons. The ferry operators have subsequently notified the State Government of their concerns.²

A blatant consequence of the disappearance of the four ferries is that motorists would have to drive long detours to reach the opposite side of the Rhine. According to the VCD German Traffic Club, this would add up to 9.1 million km by



Fig. 3: A bridge for supra-regional traffic is no solution for local needs [11] [12] Graphic: Elke Greiff-Gossen

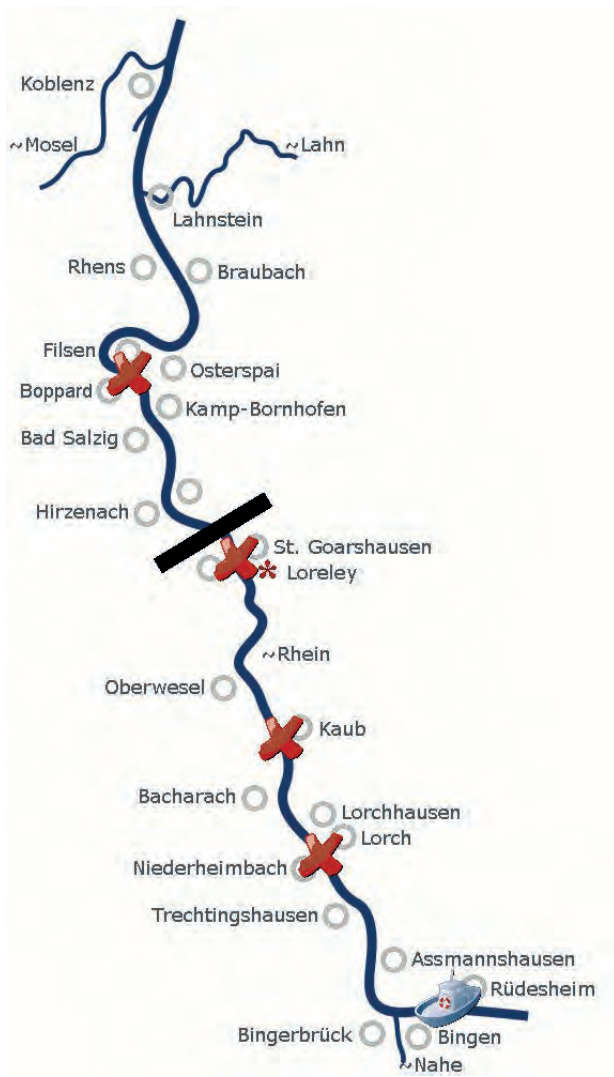


Fig. 4: With the construction of the bridge, four ferries will cease or severely restrict their operations for economic reasons. Graphic: Elke Greiff-Gossen

passenger car per year. This estimate equals 200 circumnavigations of the earth. Furthermore, pedestrians and cyclists are unable to handle such distances, and thus reliable bus services would have to be provided for these groups. According to VCD, the volume of traffic would increase to approximately 0.2 million km by bus per year. This distance equals four circumnavigations of the earth.³ These aspects were overlooked in the expert opinion by RWTH Aachen⁴.

Considering the above, not only would local Rhine crossings no longer be possible but due to enormous detours and supra-regional traffic, there would be a significant increase in traffic noise. According to the environmental impact study UVS 5, this increase is so substantial that it would become a health hazard.

In addition, the exaggerated dimensions of the Middle Rhine Bridge would divide the world heritage area in two and destroy the unique character of the Rhine valley as a cultural landscape. Urban construction and traffic reduction techniques aimed at providing a solution to the possible disruptions have not yet been taken into consideration.

In light of the above:

We want an improvement in accessibility for ALL road users without additional traffic noise, that is close to town and climate-friendly. We request that efforts are made to preserve the cultural landscape in its proportionality. An enormous concrete structure at the edge of town would only destroy this proportionality. To adequately address these issues, possibilities that integrate the Rhine crossing into existing urban development are required.

We further propose an optimized, demand-oriented ferry transport system. Ferries should run free of charge to achieve the structural improvement required by the State Government. Moreover, the operating hours should extend so that ferries operate for 18 hours at three locations, and 24 hours at one location. Considering that the costs of the bridge were incorrectly calculated in the expert opinion by RWTH Aachen 6, this solution is more economical than the bridge favoured by the State Government.

Through the proposed optimisation of ferry traffic, both sides of the Rhine would be closely interconnected. This connection would be climate-friendly, quiet, and sustainable. The distinctive features of the world heritage area would be preserved as an untouched natural and cultural landscape alongside the ferries as a cultural asset.⁷

A concerted effort is required to protect the unique cultural landscape of the Rhine valley. Therefore, we need a definite “NO” to the *Middle Rhine bridge from UNESCO*.

Threat 2: Rail traffic – 43 COM 7B.83 point 4

The world heritage is endangered by rail traffic noise, vibrations, and dangerous goods.

The Upper Middle Rhine Valley world heritage is Europe’s busiest railway line. Four hundred (400) freight trains thunder through the valley every day, producing up to 100 decibels. For comparison, this is the sound volume of a jackhammer or a jet plane during take-off – the problem: the sound waves are trapped in the valley. Due to the topography of the Rhine valley, the sound waves are reflected by the mountain slopes and water surface. This occurrence is known as the tunnel effect – the sounds echo like inside a tunnel, causing an increase in the overall noise level.



Fig. 5: The Upper Middle Rhine Valley World Heritage is Europe’s busiest railway line. Four hundred freight trains thunder through the valley every day producing up to 100 decibels. [13]

Graphic: Elke Greiff-Gossen

To achieve an audible reduction of this noise, at least 50% of train waggons would have to be retrofitted. The current average percentage of German wagons in a freight train passing through the Middle Rhine valley is a mere 14%. Consequently, since only Germany has committed itself to adjusting its wagons, simply implementing new brake pads will not have any impact.⁸

Vibration measurements in residential buildings have shown that in the world heritage Upper Middle Rhine valley area, the exposure of the population to noise is clearly too high, and consequently, the exposure to vibrations is equally unbearable. In some places, the reference values are exceeded threefold.⁹ Vibrations caused by freight traffic can also damage houses and cause health hazards. Furthermore, these vibrations require slope and rock stabilisation measures, which would destroy the visual integrity of the world heritage.

The Rotterdam-Genoa freight corridor of the trans-European railway network runs right through the Upper Middle Rhine Valley World Heritage. The traffic volume of currently 400 freight trains per day is expected to increase by a further 30% by 2030. On this 150-year-old railway line, many dangerous goods are transported, passing directly next to the houses of mediaeval townships. In the past, accidents caused by landslides and water damage to the tracks happened repeatedly. If an accident involving the transport of dangerous goods were to occur, entire historical town centres would be destroyed.

Once comfortable living in the valley, residents are now leaving because of the enormous exposure to noise and damage to their health. The housing market has also been negatively impacted and noise and vibrations have caused real estate prices to fall by up to 50%.¹⁰

We want a quiet Middle Rhine valley, a place where both residents and tourists feel comfortable. We want to preserve the scenery and prevent disasters such as landslides on slopes, water damage to rail tracks, and accidents involving dangerous goods.

As an immediate solution, *we propose* that speed limits be implemented since they are the only effective way to reduce noise. Additionally, noisy freight trains should not operate during the night, and dangerous goods must be completely banned from the valley. In the long run,

We request that freight transport be re-routed away from the narrow Rhine rift valley by building a modern railway line for freight transport elsewhere. There is an urgent need for the new railway route to be included in the Federal Transport Plan for new projects.



Fig. 6: The tunnel opposite to the Loreley.

Photo: Klaus Thomas

Thanks to the better residential quality, more people would move into the valley, and tourists would have a more relaxing experience and, thus, extend their stays. The scenery and consequently, the main attraction of this valley would be preserved. The quality of life and the natural landscape must be preserved.

Threat 3: National Middle Rhine valley gardening show 2029 - 43 COM 7B.83 point 8

The World Heritage is endangered by the planned federal gardening show BUGA 2029. Completed projects such as the remodelling of the Loreley open-air theatre, ongoing projects such as the remodelling of the Loreley plateau, and future projects such as the Crystal and the planned Loreley Hotel give rise to such fears. The renovation of the Loreley open-air theatre has destroyed the visual integrity in the heart of the world heritage area. The planned huge, luminous Crystal will also be visible from a long distance in the valley.

The Verbandsgemeinde (local commune) Loreley is having discussions with a Danish investor to build 15 villas and a hotel, altogether 600 beds and 300 parking spaces. The



Fig. 7: Houses decay. Their repair is not economical.

Photo: Elke Greiff-Gossen



Fig. 8: A hotel and 15 point houses are to be built on the Loreley plateau. A total of 600 beds and 300 parking spaces. The plan which included the location of the hotel won the 1st Prize in the competition for the general design of the Loreley Plateau. Source: <https://sgdnord.rlp.de/>

Fig. 9: The Loreley Rock as seen from the opposite side of the Rhine River, with a computer animation indicating where the hotel building is planned.

Photo: Canva / Elke Greiff-Gossen

design of this project is not congruent with the winning plan for the general design of the Loreley plateau which was submitted to UNESCO, and even the winning plan was highly questionable regarding the location, size, and architectural features of the hotel.

Another hotel is planned above Oberwesel, located at the "Günderode House." In the long run, these new buildings at beautiful viewpoints will destroy the visual integrity of the landscape by disrupting and detracting from its natural beauty.

We want no more hotels in protected areas. Development measures and projects must be prior examined concerning their logic and outward orientation on the central values of

the landscape and be subject to such values. 1 Sustainable development concepts must be a mandatory prerequisite for the use of land. The landscape must be developed according to its natural character.

We propose to redevelop buildings in the towns and cities instead of planning new buildings in protected areas. Temporary accommodation facilities, such as hotel boats, should be used during the BUGA to prevent vacancies after the BUGA. No new buildings in prominent locations such as the "Loreley" and the "Günderode Haus". Building projects should be visualised ahead of time to ascertain how they would

impact the scenery. Overcrowding of the Loreley with a "huge, luminous Crystal" and a hotel must be stopped.

The result would be the preservation of the unique character of the natural and cultural landscape. The attractiveness of the cultural landscape would be secured. The region would be fit for the future. The distinctive features would be preserved. If we want to avert the BUGA threat, this means: "demanding deconstruction, refusing to accept a fait accompli." Example: the open-air theatre. Clear statements are necessary: no to the huge, luminous crystal, no to the hotels, no more sealing of land.

References

1. RVDL Rheintal Charta
2. www.loreleyinfo.de/pdf/UNESCO/2-schreiben-der-faehrbetreiber-an-die-landesregierung.pdf
3. www.loreleyinfo.de/pdf/UNESCO/3-mittelrheinbruecke-zusatzverkehr-durch-umwegfahrten-vcd.pdf
4. www.loreleyinfo.de/pdf/UNESCO/4-verkehrliche-bewertung-einer-bruecken-tunnel-oder-faehrverbindung-im-mittelrhein-bei-st-goar-rwth-aachen-prof-dr-ing-dirk-vallee.pdf
5. www.loreleyinfo.de/pdf/UNESCO/5-umweltvertraeglichkeitspruefung-cochet-consult-2009
6. www.loreleyinfo.de/pdf/UNESCO/6-mittelrheinbruecke-kosten-rolf-daum.pdf
7. www.loreleyinfo.de/pdf/UNESCO/7-faktencheck-bruecke-optimierter-faehrbetrieb.pdf
8. www.loreleyinfo.de/pdf/UNESCO/8-bewertung-von-modellen-einer-schnellen-umruetzung-von-gueterwagen-auf-laermmindernde-bremssohlen-dr-ing-gottfried-ilgmann.pdf
9. www.loreleyinfo.de/pdf/UNESCO/9-erschuetterung-belastung-nicht-hinnehmbar.pdf
10. www.loreleyinfo.de/pdf/UNESCO/10-bahnlarm-sorgt-fuer-wertverlust-bei-immobilien.pdf
11. www.loreleyinfo.de/pdf/UNESCO/11-mittelrheinbruecke-ist-ueberregionale-verkehrsverbindung-prof-dr-jur-willy-spannowsky.pdf
12. www.loreleyinfo.de/pdf/UNESCO/12-mittelrheinbruecke-ist-ueberregionale-verkehrsverbindung-landesrechnungshof.pdf
13. www.loreleyinfo.de/pdf/UNESCO/13-zugzahlen-pro-rheintal-bahn-laerm-das-problem-uebersicht.pdf

The Prosecco Region: A UNESCO Area out of Control and at Risk of Overbuilding

Gianluigi Salvador, Pesticide Action Network Italy



On July 7th, 2019 the UNESCO World Heritage Committee gathered in Baku (Azerbaijan) where the two documents; „WHC / 19 / 43.COM / 8B.Add“ (issued by the UNESCO WH Centre of Paris)¹ and „WHC / 19 / 43.COM / INF.8B1.Add“ (issued by the Evaluation Commission of the International Council on Monuments and Sites – ICOMOS)² were examined. In light of these documents, decision „43 COM 8B.37“³ was made and „The Hills of Prosecco di Conegliano and Valdobbiadene“ were inscribed into the List of World Heritage sites and thus became the 55th Italian UNESCO site⁴.

This decision, however, was made without consideration to the years of protests expressed by local residents and environmental organizations⁵. The UNESCO/ICOMOS Mission, which on this second evaluation did not carry out field in-

spections, ignored the serious concerns expressed by the resident population of the region. The residents express the fear that the already critical situation of the region will further exacerbate via chemical contamination by pesticides (used in vineyards management), deforestation and hill excavations (some new activity began immediately after the UNESCO decision, see Fig. 1–3)⁶.



Fig. 1: Municipality of Tarzo: Deforestation and excavation for vineyards in the Mire area, September 2019.

Photo: Gianluigi Salvador



Fig. 2: Municipality of Miane, Premaor locality: Deforestation to create a vineyard, 23.7.2019.

Photo: Marcia (Stop Pesticidi)



Fig. 3: Municipality of Miane, Premaor locality: Planted vineyard after deforestation, November 2019.

Photo: Gianluigi Salvador

1 UNESCO WH Centre Paris: <https://whc.unesco.org/archive/2019/whc19-43com-8B-Add-en.pdf>

2 ICOMOS International: <https://whc.unesco.org/archive/2019/whc19-43com-inf8B1-Add-en.pdf>

3 UNESCO WH Committee: <https://whc.unesco.org/document/176361>

4 2019 ICOMOS report for the World Heritage Committee 43rd ordinary session, Baku, 30 June – 10 July 2019 Addendum Evaluations of Nominations of Cultural and Mixed properties. <https://whc.unesco.org/en/sessions/43com/>

5 “The Hills of Prosecco” and the UNESCO paradox: Preserving heritage without caring about humanity: <https://ytali.com/2019/11/14/e-colline-del-prosecco-e-il-paradosso-unesco/> <http://www.europeanconsumers.it/2019/09/18/considerazioni-in-merito-allapprovazione-del-sito-unesco-le-colline-del-prosecco/>

6 Annex1: UNESCO prosecco hills - Premaor cutted wood for vineyard 23.7.2019; Annex2: UNESCO prosecco hills - Premaor planted vineyard 11.2019; Annex3: UNESCO - Prosecco hills Tarzo deforestation and excavation for vineyards in the Mire area - 20.9.2019;

As mentioned, the approval of the WH Committee took place after the analysis of the two documents:

1. Although ICOMOS International released a positive assessment it also listed 15 major recommendations (almost admonitions) to the Veneto Region on issues that must be resolved after the approval of the WH Committee on 7 July 2019.
2. The evaluation of the WH Centre in Paris contains only 14 of those 15 recommendations proposed by the ICOMOS International commission and omitted the last (15th) recommendation, which states:

“Ensuring that all major projects that could impact on the property are communicated to the World Heritage Centre in line with Paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention”.

Chapter IV (Process for monitoring the state of conservation of world heritage properties) of the omitted 15th recommendation, which refers to § 172 (Information received from States Parties) of the Operational Guidelines for the Implementation of the World Heritage Convention (WHC.17 / 01 – 12 July 2017), reads:

“The World Heritage Committee invites the States Parties to the Convention to inform the Committee, through the Secretariat, of their intention to undertake or to authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved”.

The credibility of the UNESCO WH Committee may be impacted by registering a site before local problems are solved. In addition, the magnitude of the problems at the site may even become amplified in the future.

The omission of the 15th recommendation in the Report of the WH Centre in Paris (whc19-43com-8B-Add) takes away the responsibility of the WH Centre in Paris and effectively prevents it from monitoring times, costs and, more importantly, the implementation of the 14 other recommendations for future modifications and improvement.

This lack of monitoring would be considered unacceptable in any other Quality Management System because it contradicts the principle of continuous improvement, as is foreseen, for example, in the International Standards of Quality Systems: ISO9000, ISO14000, EMAS, and in the European Production Regulation biological n. 848 / 2018.

By suppressing the 15th recommendation, the UNESCO WH Centre grants the Veneto Region the freedom to legislate in a manner contrary to the directives of paragraph 172. This has allowed the Veneto Region to issue an ad hoc amendment to the Regional Law “omnibus”⁷, n.29 of 25 July 2019, in which ‘Article. 13’ was inserted as art. 44bis with the title: *“Re-use of structures in the agricultural area for purposes of tourist lease or for purposes of classification as a dependency of a widespread hotel”*, within another regional law n.11 of 24.4.2004 “Rules for the government of the territory and in the field of landscape”. The amendment was presented on 17 July 2019, only 10 days after the approval by UNESCO, on 7 July 2019.

In its current form, this new law concerns the whole Veneto Region, as confirmed by the Regional Councilor for Tourism, Federico Caner, however it was actually designed with a focus on the Prosecco Hills with the opportunity for the Regional Council to establish a list of the municipalities concerned⁸.

This sudden amendment allowed the political parties within the Veneto Regional Council to bypass usual procedures, which normally require a public debate with the relevant commission and responsible persons. This is an attack on democracy, participation and transparency. The amendment enables an infinite number of changes and exceptions to be made to far too many existing laws, including those concerning urban planning, territories, landscape, quarrying, horseback riding, intensive farming, sewage, sales kiosks, transport of boats, etc.

Transparency and participation in the written form and evaluation of the measures are weakened as per ‘art.4’, ‘art.24’ and ‘art.32 c.9’. The controls are made more complicated as per ‘art.8’ and ‘art.26’. And on top of this, such a large number of possible exemptions have been added to the legislation that the (possible negative) impact on the territory (art.12.c.2), particularly in agricultural areas, has increased.

The implementation of ‘Article 13’ has enabled the enforcement of regulations that will disrupt the urban and countryside landscapes of the Veneto Region as well as the municipalities of the UNESCO World Heritage property.

Mr. Federico Caner (Regional Councilor for Tourism) confirms that the law will authorize the transformation of existing chicken coops, tool sheds, stables, barns, slums and

7 <https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=2ahUKewj7soyRyqTmAh-WHMewKHTIADwkQFjABegQICxAF&url=https%3A%2F%2Fbur.regione.veneto.it%2FBurvServices%2FPubblica%2FDettaglioLegge.aspx%3Fid%3D399407&usq=AOvVawOVWQQ3Gie7DLRx5Utaht8>

8 Veneto Regional Councilor Andrea Zanoni – CS 22.7.2019: Approvata una norma “omnibus” che massacrerà ancora il Veneto.

garages in the agricultural area „either for tourist rental or to be classified as an annex of a multi-building hotel“.

These buildings will not be subjected to construction fees and their volumes may be up to 120 cubic meters, a derogation from the law on land consumption (Art. 13 Paragraph 6). The World Heritage property includes twelve municipalities, covering of about 10,000 hectares, and concerns approximately one thousand potential buildings. This is a significant deviation from what the WH Committee declared in Baku⁹:

“Invite all Party States to prioritize the effective protection, conservation and management of World Heritage properties situated on their territories in consistency with the “Policy Document for the integration of a sustainable development perspective into the processes of the World Heritage Convention“;

The UNESCO Prosecco area is out of control and in a critical situation, therefore:

To the WH COMMITTEE

WE RECOMMEND:

The reintegration of the 15th recommendation outlined by the ICOMOS International document; “2019 / whc19-43com-inf8B1.Add” and omitted from the WH Center UNESCO in Paris report “2019 / whc19-43com-8B-Add” and omitted from the WH Committee document; “2019 / whc / 19 / 43.com / 18”.

to the ITALIAN STATE

WE RECOMMEND:

Make public the projects that implement the 14 UNESCO recommendations for the Prosecco Hills, recommendations as they are presented in the following three documents:

- “2019 / whc19-43com-inf8B1.Add” of ICOMOS International UNESCO,
- “2019 / whc19-43com-8B- Add” of the WH Center UNESCO in Paris and
- “2019 / whc / 19 / 43.com / 18” of the UNESCO WH Committee.

⁹ UNESCO WH Committee – <https://whc.unesco.org/document/176361>

Tourism Development Threatens the Fertő – Neusiedler See Cultural Landscape

Christian Schuhböck, Alliance for Nature
Zoltán Kun, Wildland Research Institute

ALLIANCE FOR NATURE® **WRI** WILDLAND RESEARCH INSTITUTE

Lake Neusiedl (German: Neusiedler See) is a multi-protected steppe lake, an important European bird reserve, an internationally recognised National Park and a transboundary World Heritage Site of Austria and Hungary. The largest drainless steppe lake in Central Europe, Lake Neusiedl covers an area of around 320 km², of which almost 180 km² is accounted for by its reed belt. The existence of a globally unique cultural landscape situated at the interface of several natural, cultural and linguistic areas, representing a truly transboundary region, has been critical for the inclusion of the “Fertő – Neusiedler See” in the UNESCO World Heritage List.



Fig. 1: The landscape of Fertő – Neusiedler See with its mix of meadows, fields, reed belts, villages and vineyards. The newly-built marina and holiday home developments of Neusiedl and Jois are clearly visible. Photo: Markus Stermeczki

Located in the Small Hungarian Plain between the Alps and the Puszta, the Lake Neusiedl region offers a variety of habitats of the Alpine, Pannonian and Mediterranean zones, ranging from light oak forests to salt areas, extensive reed and water areas up to steppe-like grasslands. The almost 45 salt puddles of the “Neusiedler See – Seewinkel National Park”, the only steppe national park in Central Europe, are a breeding ground for around 300 rare bird species and an important hub for the bird migration from the Arctic to Africa.

At the prehistoric trade route between the Adriatic Sea and the Baltic Sea, Lake Neusiedl has been an intersection of many cultures. Germanic, Slavic and Finno-Ugric population groups met here, and even today, the region has an exceptional ethnic diversity. Legacies of the continuous and eventful settlement history since the earliest times are numerous archaeological monuments, such as the quarries in St. Margarethen and Fertőrákos.

Wood-cutting, drainage, hunting and grazing by the local people have created a cultural landscape over the centuries characterized by reeds, water and vineyards. The fact

that viticulture has always played an important role is also reflected in the regional rural architecture. To this day, the villages around the lake show cellars, press houses and cellar lanes which still form harmonious ensembles in the village centers, or reveal old local structures. Together with its small lakes (Zicksee, Kirchsee,...), small salt puddles (Lange Lacke, Fuchslochlacke,...), the small towns (Rust, Illmitz,...), the Esterhazy castle in Fertőd and the surrounding vineyards, Lake Neusiedl offers a unique mosaic landscape.

A multi-protected region of international importance

The biodiversity, diversity of biotic communities and cultural development mark the Neusiedler See area as a natural area of international importance, enjoying multiple national and international protection:

- Protected landscape conservation area and partial nature reserve in Austria since 1977
- UNESCO Biosphere Reserve since 1977 (Austria) and 1979 (Hungary)
- Wetland of international significance according to the Ramsar Convention since 1982

- Cross-border and internationally recognised National Park since 1991 (Hungary) and 1993 (Austria)
- Natura 2000 and European Protected Area since 1996
- Transboundary UNESCO World Heritage Site since 2001

Tourism projects in Austria

For some time now, however, rigorous obstructing construction has been taking place around the lake, highly damaging its natural and cultural heritage and threatening its continued existence. Fueled by Real Estate speculation, artificial islands with houses and villas have been built that extend directly into the reed belt, sometimes as far as the open lake area. On the other hand, hotels and restaurants are built directly on the lakeshore in order to promote tourism throughout the year. This construction boom has now received such fierce criticism that citizens' initiatives have formed against the obstruction of Lake Neusiedl in Austria and Hungary. Should it continue unabated, the authenticity and integrity of the "Fertő - Neusiedler See Cultural Landscape" is in danger of getting lost entirely.

A villa park of a total area of 63,800 m² is to be built in **Oggau**. In **Breitenbrunn** the existing seaside resort is to be expanded with a marina, a lakeside restaurant, rentable lodges and a water sports centre. In **Jois**, the existing artificial "Island World" with 70 houses is being expanded and enlarged by 11 villas. **Neusiedl am See** plans to build 23 private lake houses and a lake hotel. **Weiden am See** completed a two-storey restaurant right at the lake shore. (See the photographic documentation annexed to this report for a visualization of these projects.)

The Tourism Project in Sopron, Hungary

On the Hungarian side, the only direct access to the lake, the lido of **Fertőrákos**, is rigorously expanded. The Hungarian government is planning a large-scale tourism development project inside the core zone of the World Heritage

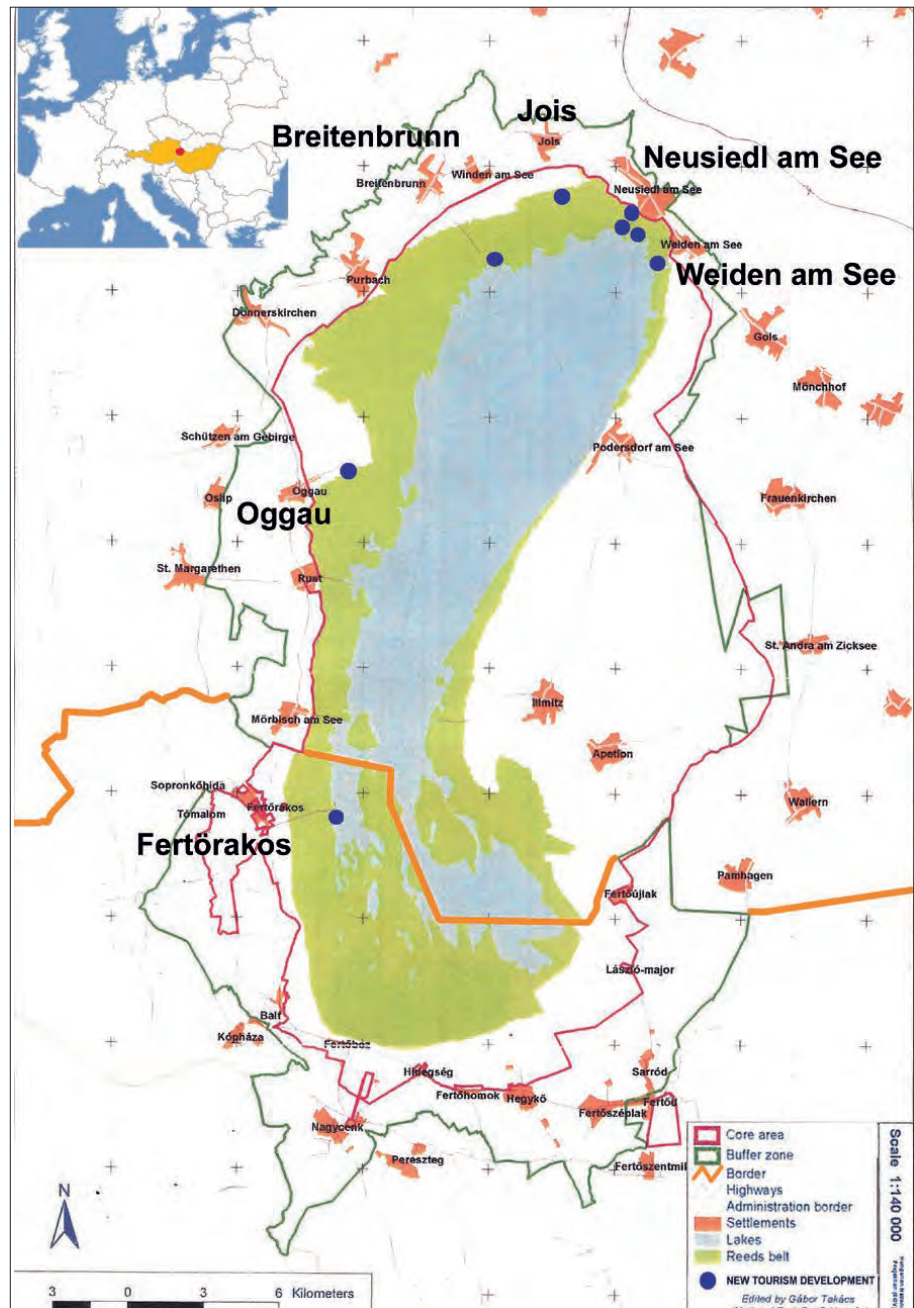


Fig. 2: New tourism development projects in the Fertő–Neusiedler See WHS.

Map: UNESCO / Andrea Martinez

site. The suggested development aims at investing roughly 80 million EUR in tourism facilities which are not compatible with the protection of the cultural and natural diversity of the landscape.

Lake Fertő is part of the transboundary Fertő-Hanság National Park. This area is among the few Hungarian protected areas which are registered in the IUCN database as Category II. While tourism use would be possible in principle, by its scale the planned tourism complex is not something to be considered as ecotourism or sustainable. The government suggests 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 (an estimated daily traffic of 3,000 cars)
- a port for 450+ yachts
- a port for 350+ paddling boats
- a 4-star hotel right on the shore of the lake
- a sport complex with tennis courts
- a visitor centre
- camping and motel.

The total new artificial cover of land surface would approximately be 12 hectares.

The suggested new infrastructure elements could be established at alternative locations outside the core area, and should not be built within the inscribed WH property. The investment poses the following challenges and threats to the property:

- the state parties did not develop an Integrated Management Plan for the whole WH site, so strategic decisions about tourism development in the property are difficult to make;
- there is not social and / or economic justification behind the investment;
- the Environmental Impact Assessment of the investment ignored the consultation with the Austrian stakeholders and took neither the transboundary impacts during the operational phase nor the long-term climate impacts into account;
- the suggested buildings disturbs the integrity of the landscape and does not seem to suit to the local rural architecture style, including the utilisation of reed for roof covers;
- there has been no proper consultation with local stakeholders and citizens living in the villages surrounding the property.
- the scale of the investment does not fit into the concept of developing sustainable rural tourism through Small and Medium Enterprises benefitting local value chains.

The investment will increase the tourism pressure on the area while it remains unclear how its impact on the current infrastructure, human settlements and the natural values of the area could be mitigated.

“Wildfire by the lake” – resistance to obstruction

Due to the tourism projects around the lake, citizens’ initiatives were formed already in 2017. On behalf of “Alliance For Nature”, a documentation for the “ICOMOS Heritage Alert” was transmitted to ICOMOS International and presented to the public during a press conference in Vienna. “Wildfire by the lake” headlined the Austrian newspaper “Wiener Zei-

tung” and reported, like other renowned media, on the obstruction of the Neusiedler See.

In response, the Burgenland State Government commissioned a “Master Plan” titled “Protect by Use” in order to coordinate the interests of nature conservation, World Heritage, transport and tourism. However, the master plan has not yet been drawn up, while tourism projects are implemented step by step. Originally, only a renovation and modernization of the beach in Fertőrákos was planned. These plans developed into a mega-tourism project with an investment of 23.3 billion forints (≈ € 75 million), according to recent media reports. In response, in 2019 resistance arose against the obstruction of the Lake in Hungary, too.

Call for an Environmental Impact Assessment

As part of the transnational press cruise at Lake Neusiedl on 25th September 2019, the Austrian and Hungarian “Friends of Lake Neusiedl” together with other non-governmental organisations signed the “Resolution on the protection of Lake Neusiedl from further obstruction with a demand for a cross-border Environmental Impact Assessment” set up by “Alliance For Nature”, because such has not yet been carried out and is rejected by Hungary.

Based on this resolution, the Parliament of the Burgenland Federal State decided unanimously on 14th November 2019 that it is committed to the protection and long-term preservation of the World Heritage Site. In addition, the Burgenland government was asked to re-address the Federal Government in order to ensure that the Hungarian authorities are asked again to carry out a cross-border Environmental Impact Assessment (EIA) referring to the project in Fertőrákos. However, insiders fear that both the Austrian Federal Government and the Burgenland State Government will only urge the Hungarian government reticently for a transboundary EIA, as then Austrian tourism projects may also be subject to it.

An urgent appeal

We appeal to the Burgenland State Government

- to start without further delay the work on a Master Plan for the Austrian part of the World Heritage property, giving full priority to its protection and safeguarding.

We appeal to the State Parties of Austria and Hungary

- to immediately halt, and reverse where possible, any tourism-related development and infrastructure projects on Fertő - Neusiedler See until review and approval by UNESCO, and to submit plans for all such projects to UNESCO, according to §172 of the Operational Guidelines to the World Heritage Convention;

- to start without further delay the work on a cross-border Environmental Impact Assessment of planned tourism-related projects for the entire World Heritage property and its buffer zone, including their cumulative impacts on its OUV;
- to start without further delay the work on an Integrated Management Plan for the entire World Heritage property.

We appeal to the World Heritage Committee

- to request the State Parties of Austria and Hungary to submit any and all plans for projects that could have an impact on the property’s OUV to the Committee for review according to §172 of the Operational Guidelines to the World Heritage Convention;

- to request the State Parties of Austria and Hungary to invite a joint UNESCO/ICOMOS/IUCN Reactive Monitoring Mission in order to assess the impact of tourism development on the integrity of the property;
- to set a deadline to the State Parties of Austria and Hungary to submit a cross-border Environmental Impact Assessment of planned tourism-related projects for the entire World Heritage property and its buffer zone, including their cumulative impacts on its OUV, and indicating that if this deadline should be missed, the Fertő - Neusiedler See Cultural Landscape will be inscribed on the List of World Heritage in Danger.

Photo Documentation: New Tourism Development Projects on Fertő – Neusiedler See



Fig. 3: Project “Am Hafen” in Neusiedl am See (left) and completed buildings in February 2020 (right).
Graphic and photo: www.amhafen.at/de/Baustelle



Fig. 4 and 5: Project Seebad Neusiedl in Neusiedl am See: Hotel (left) and Pool area (right).



Graphics: baumschlagerrhutter.com/projekte



Fig. 6 and 7: Project Seevillen (Lake Villas): Villas (left) and promotion presentation (right) using the logos of Natura 2000 and World Heritage.

Graphics: www.seereal.at/projekt/detail/id2039640



Fig. 9: Project Island World in Jois.

Photo: Christian Schuhböck



Fig. 10 and 11: Seebad Breitenbrunn Sport Resort (left) and Marina (right).



Graphics: gregor&sebastian architekten, Korbwurf Landschaftsarchitektur



Fig. 12 and 13: The Seereal Project at Oggau.



Graphic: www.seereal.at Photo: Christian Schuhböck



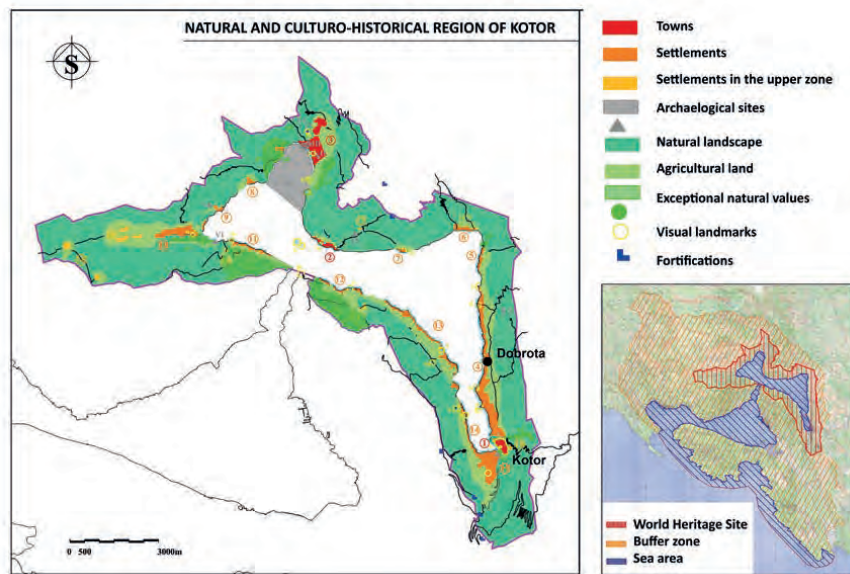
Fig. 14 and 15: The Fertőrákos Project.



Graphics: www.cyberpress.hu

Current State of Affairs in the Natural and Culturo-Historical Region of Kotor

EXPEDITIO – Centre for Sustainable Spatial Development
The Friends of Boka Kotorska Heritage Society



Furthermore, for quite some years now, both the expert public and civil sectors in the Kotor Region have been pointing out to a truly **alarming situation** regarding the protection, planning and management of this World Heritage Site.

Notwithstanding the formal efforts made by Montenegro to comply with the decisions of the World Heritage Committee, the negative changes that are clearly visible in the space indicate not only that no proper mechanisms have been put in place in order to protect the Outstanding Universal Value of this World Heritage site, but also that these negative trends persist.

As far back as since 2003 the UNESCO/ICOMOS Advisory and Reactive Monitoring Missions Reports and the World Heritage Committee Decisions have been continuously and clearly focusing on the problematic situation in the area of the Natural and Culturo-Historical Region of Kotor (herein-after referred to as Kotor Region), primarily in relation to **excessive urbanization, but also to the inefficient protection and management system.**

Extremely important for the improvement of the state of the Kotor Region are the recommendations of the *Joint UNESCO World Heritage Centre / ICOMOS Reactive Monitoring Mission* of October – November 2018, as well as the 2019 Decision of the World Heritage Committee **“urging the State Party, among other things, to fully implement all the recommendations of the 2018 mission”.**



Protection

One of the primary causes for the alarming situation in Kotor Region is the **degradation and current dysfunctionality of the cultural heritage protection system.** Unfortunately, this topic has not been sufficiently considered in the 2018 UNESCO WHC/ ICOMOS Reactive Monitoring Mission Report, while we regard it as one of the issues that are crucial for the preservation of the World Heritage site.

The legal and institutional changes that happened in 2010 have totally

weakened the protection system in the Kotor Region and failed to improve the situation. The institution that was established after inscribing the Region on the World Heritage List, with its seat in Kotor (Regional Institute for Heritage Protection), the purpose of which was to work on protecting the Region and its buffer zone, underwent transformation which has led to it losing competence, powers, and autonomy. A Report on the Implementation of the Management Plan for 2017¹ prepared by the Management Council, stated: “During the reorganization, the human resources of the Regional Institute were considerably reduced, especially for the area of the protection of architectural heritage... In fact, rounded-up processes comprised by the methodology of the preservation and protection of cultural properties, which had once been merged in the Regional Institute, have become fragmented to the extent that it cannot be considered an efficient system.”



The report recommends: “It is necessary to perform an expert analysis of the existing legal framework and of the state of conservation in the area following the transformation, and to undertake the necessary measures in order to conduct the strengthening of the institutional protection of Kotor Region with the seat in Kotor.”

Spatial Urban Plan of the Municipality of Kotor (hereinafter: SUP)

The Draft Spatial Urban Plan of the Kotor Municipality, which also pertains to the World Heritage Site of Kotor Region, was developed in early 2019, and the first public hearing was organised in April-June 2019. The Draft SUP was updated in February 2020, and a repeated public hearing was conducted in the period 4-24 March 2020.²

EXPEDITIO and the Friends of Boka Kotorska Heritage Society prepared and sent comments about the proposed Draft SUP, believing that it is **not compliant with the UNESCO World Heritage Committee Decisions**. The Draft SUP did accept certain but not some other key Recommendations of

the 2018 Joint UNESCO WHC/ ICOMOS Reactive Monitoring Mission, which is evident in the fact that it **clearly proposes the retaining of the bypass road Škaljari-Kotor-Dobrota and leaves the possibility for the construction in Glavati Cove**.

In addition, the **proposed solutions are in direct conflict with the measures proposed in the Study on the Protection of Cultural Properties in the Municipality of Kotor**, which have been just formally cited in the Draft SUP. We believe that, if the proposed SUP of February 2020 is implemented, despite the fact that it partly adopted Recommendations of the Joint Reactive Monitoring Mission, **the Kotor Region will face a serious risk, the biggest one ever since the region has been included in the World Heritage List, of losing its Outstanding Universal Value**.

Moratorium

One of the recommendations of the *UNESCO WHC / ICOMOS Reactive Monitoring Mission* is that: *The moratorium on new construction should be maintained until the adoption of the emerging spatial plan for the Kotor area and the revised Management Plan*. Although the “moratorium” has been formally in force since March 2017, when the Government of Montenegro issued its *Decision on the ban on construction activities in Kotor Region until the adoption of the Spatial-Urban Plan for Kotor Municipality*, **construction activity in the area has actually not stopped**. Numerous active construction sites throughout 2019 and at the beginning of 2020 are clear testimony to this, as well as numerous completed structures, especially in the area of Dobrota. Although formal explanations state that the only structures being built are the ones for whom construction permits had been provided prior to the coming into effect of the mentioned Government Decision, the interventions in the space are quite significant and have a big impact on the OUV of Kotor Region.

Council for the Management of Natural and Culturo-Historical Region of Kotor

Pursuant to the *Law on the protection of Natural and Culturo-Historical Region of Kotor* (2013), for the purpose of coordination of activities of Region’s protection, preservation and management, the Government is to establish a **Council**



1 <http://www.kotor.me/me/savjet-za-upravljanje-podru%C4%8Djem-kotora/>

2 http://www.mrt.gov.me/rubrike/javna_rasprava/222325/Ponovna-javna-rasprava-o-Nacrtu-Prostorno-urbanisticckog-plana-Opstine-Kotor-i-o-Nacrtu-lzvjestaja-o-strateskoj-procjeni-uticaja.html

for the Management of the Natural and Culturo-Historical region of Kotor. The Council is made up of representatives of the Local Administration, Ministries, the Administration of the Protection of Cultural Properties, Montenegrin National Commission for UNESCO and NGOs active in the field of protection and preservation of Kotor. The first composition of the Council was appointed at the end of 2015, the second one in September 2017 and the last one in January 2020.



Although the Law lays down important competences of the Council, practice has shown that the Council acts as a mere form, that it serves as a platform for the exchange of information among various stakeholders, but that it has no essential bearing on the processes that happen in Kotor Region. The **existing management system has proved to be dysfunctional and inadequate** for an area as complex as the Kotor Region, and it is necessary to define new mechanisms and management bodies. The Council itself clearly states that its **role does not entail management functions** which had been recognized in the Management Plan itself and that it is **“necessary to review the legal and institutional framework which would improve the mechanisms and the bodies that were to manage the region.”**³

Based on the *Conclusion of the Municipal Assembly of Kotor*⁴, in January 2020 the Government of Montenegro took a **Decision on dismissal of the President and five members of the Council for Management of the Natural and Culturo-Historical Region** of Kotor prior to expiry of their term of office⁵. All of the five dismissed members of the second composition of the Council are **experts in different fields of cultural heritage protection, including experts with unrivalled experience and best references in the protection of cultural heritage of the Kotor Region**. The fact that the **best experts in the field of cultural heritage protection in the Kotor area are dismissed from the Management Council** clearly speaks of the lack of under-

standing of the complexity and importance of protection and management of the Kotor Region, of the lack of appreciation and respect for professionals, as well as of intentions for further development of this World Heritage property.

Taking into account all the above, a representative of the non-governmental organizations, a conservation architect and a member of EXPEDITIO and The Friends of Boka Kotorska Heritage Society, has resigned from membership in the Council in February 2020.

Management Plan Review

The Management Plan for the Natural and Culturo-Historical Region of Kotor is a strategic document which should be the basis for the efficient management of this region. The Management Plan was adopted in 2011, developed for a period of 15 years, with its reviews to take place every three years. The reviewing process **started in March 2019**. A Working Group for reviewing the Management Plan was established by the Mayor of Kotor but **the process was stopped in October 2019**, without reasons given to the Working Group.

Bearing in mind the importance of the Management Plan for the management of the Kotor Region, which was particularly emphasized in the 2018 UNESCO WHC / ICOMOS Reactive Monitoring Mission Report, we believe that the attitude the competent state and local institutions have had so far speaks of their lack of understanding of the importance of management in general, and the importance of the Management Plan.

Conclusion

Forty years after its inscription on the World Heritage List, the condition of the Natural and Culturo-Historical Region of Kotor is extremely worrying. Notwithstanding formal endeavours, the current systems for the protection, planning and managing of Kotor Region have been undermined and are inefficient. Unfortunately, all this has also been caused by very poor systems of spatial planning and cultural heritage protection in Montenegro in general, reflected particularly negatively and very visibly in the area of Kotor World Heritage Site.

Bearing in mind all that happened in recent years, we dare say that there is a lack of understanding of and willingness to preserve the Outstanding Universal Value of Kotor Region, giving rise to all other problems. We hope that the new situation we all have found ourselves in since the beginning of 2020 due to the pandemic will be an opportunity to halt negative trends and reconsider the existing problematic models and plans, as well as undergo fundamental changes leading to the protection and sustainable development of the Kotor World Heritage property.

³ Conclusions of the first session of the Second Council held in January 2018 and the Report on the Implementation of the Management Plan for the year 2017, prepared by the Council <http://www.kotor.me/me/savjet-za-upravljanje-podru%C4%8Djem-kotora/>

⁴ <http://www.kotor.me/files/documents/1575637959-Zaklju%C4%8Dak%20o%20imenovanju%20Savjeta%20za%20upravljanje%20Kotorom.pdf>

⁵ http://www.gov.me/sjednice_vlade_2016/152

The World Heritage Committee and Ohrid Region Destruction: Silent Witness or Passive Accomplice?

Daniel Scarry, Emilija Apostolova Chalovska and Sonja Dimoska, Ohrid SOS



Ancient Lake Ohrid is thought to hold more animal and plant species by surface area than any other inland water in the world¹. Shared between the Republics of Albania and Macedonia, its varied aquatic habitats host globally unique flora and fauna at every level of the food chain², both that have evolved in-lake and which survive as relict species, now extinct elsewhere³. Combined with a rich bird-life⁴ and a mountain massif of continental significance for flora⁵ at Galichica National Park, this biodiversity haven has further supported 7,000 years of continuous human settlements⁶, which have given birth to a rich array of archaeological, artistic and architectural treasures with particular concentration in the Old Town of Ohrid.

In recognition of these exceptional phenomena, the Macedonian side of the Ohrid Region attained World Heritage Site (WHS) status for its natural (criterion vii) and cultural (criteria i, iii, and iv) attributes in 1979 and 1980 respectively. Site boundaries were extended to Albania in 2019, forming a 94,728.6 ha property: Natural and Cultural Heritage of the Ohrid Region.

Designation as world heritage has not, however, prevented severe deterioration of the site's values. As early as 1998, a UNESCO-ICOMOS-IUCN State of Conservation Report warned that "the enormous increase in constructions and settlement activities has seriously altered the original balance in the region" and identified needs for integrative planning, strengthened management, a protective legal

framework and consideration of a buffer zone⁷, which was reinforced by World Heritage Committee (WHC) Decision 22 COM VII.30.

None of these conservation shortfalls has been addressed in the two decades since. Spurred by the tourism industry, planned, unplanned, legal and illegal construction have unleashed a firestorm of habitat loss and deterioration from gradual usurpation of the vital Studenchishte Marsh⁸ (Lake Ohrid's last intact coastal wetland) to encroachment on the Springs of Saint Naum (a hotspot for endemic species), and many other locations besides⁹.

This construction boom has coupled with a wave of other pressures: the near collapse of the wastewater system¹⁰; abrupt water level fluctuations due to the inappropriate management of hydroelectric dams¹¹; unsustainable fishing¹²; unsuitable agricultural practices¹³; reed belt destruction¹⁴;

1 Albrecht, C. & Wilke, T. (2008) Ancient Lake Ohrid: Biodiversity & Evolution. *T. Hydrobiologia* 615: 103.

2 Ibid.

3 IUCN (2017) Natural and Cultural Heritage of the Ohrid Region, 2017 Conservation Outlook Assessment. IUCN, Gland, Switzerland.

4 Ibid.

5 Radford, E.A. and Odé, B. eds. (2009) *Conserving Important Plant Areas: investing in the Green Gold of South East Europe*. Plantlife International, Salisbury.

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

7 UNESCO World Heritage Centre, ICOMOS, IUCN (1998) *State of Conservation for the Natural and Cultural Heritage of the Ohrid Region*. World Heritage Centre, Paris, France.

8 Apostolova, N., Scarry, D. and Verhoeven, J. T. A. (2016) Studenchishte Marsh as an Integral Part of Lake Ohrid: Current Status and Need for Protection. *Wetland Science and Practice*, Vol. 33, No. 2.

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

10 Ohrid News (2018) *Wastewater Treatment Plant for Lake Ohrid on Verge of Total Collapse*. Published June 5th 2018. Retrieved 2019/12/14 from <https://www.ohridnews.com/kolektorskiot-sistem-na-ohridskoto-ezero-pred-tselosen-kolaps/>

11 Scarry, D. (2019) *Lake Ohrid and Hydropower*. In: *Heritage Dammed: Water Infrastructure Impacts on World Heritage Sites and Free Flowing Rivers*. Civil Society Report to the UNESCO World Heritage Committee and Parties of the World Heritage Convention. Published by Rivers without Boundaries and World Heritage Watch. Moscow.

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

13 Ibid.

14 Ohrid SOS (2019) *World Heritage on the Edge II: Engine of Neglect*, Supplementary Material. Retrieved 2019/12/13 from https://ohridsos.files.wordpress.com/2019/07/world-heritage-on-the-edge-ii_engine-of-neglect_combined.pdf

substandard and rogue solid waste disposal¹⁵; uncontrolled all-terrain vehicle tours scarring national park habitats¹⁶; and the Sateska River, which has deluged Lake Ohrid with 100,000 m³ of sediment including 38 tonnes of phosphorus annually after it was artificially rerouted in the 1960s¹⁷. Combined, the river, agriculture and wastewater alone are expected to create in-lake dead zones due to eutrophication as global temperatures rise¹⁸.

Despite the proliferation of threats, the next WHC decision to address the destruction (38 COM 7B.58) came in 2014. In the meantime, numerous large-scale infrastructure and tourism projects had been envisaged¹⁹; chronic illegal building was destabilizing the WHS^{20, 21}; suspected species extinctions had occurred on both local²² and absolute levels²³; evidence of a pollution gradient was emerging²⁴; boat numbers had soared²⁵; and wastewater overflows were already occurring up to 100 times per year²⁶.

Facing a “creeping biodiversity crisis”²⁷ at a property it has overseen for 40 years, WHC failure to engage in the issues

threatening the Ohrid Region escalated to negligence at its 43rd Session in 2019. After the majority of 19 recommendations established by UNESCO, ICOMOS and the IUCN during a Reactive Monitoring Mission (RMM) to the site in 2017 had not been sufficiently implemented, each of these expert technical and advisory bodies concluded that the Ohrid Region should be placed on the List of World Heritage in Danger²⁸.

Incredibly, the delegation members of the WHC, whose career background is often diplomatic or political²⁹, i.e. non-expert, decided to override this advice, with China, Brazil, Hungary and Bosnia even securing changes to a draft decision from the World Heritage Centre³⁰, deleting paragraph 8 references to anthropogenic pressures and instead praising Macedonia’s actions to remediate the sewerage, adopt a new management law, return the Sateska River to its original path, and task institutions with carrying out RMM requests.

15 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.

16 ATV Adventure Ohrid. Retrieved 2019/12/14 from <https://www.atvadventure-ohrid.mk/> [online] Ohrid, Republic of Macedonia.

17 Ministry of Culture, and Ministry of Environment and Physical Planning, Republic of Macedonia (2019) Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029. Skopje, Republic of Macedonia.

18 Matzinger, A. et al (2007) Eutrophication of ancient Lake Ohrid: Global warming amplifies detrimental effects of increased nutrient inputs. *Limnology, Oceanography* 52 (1).

19 Ohrid SOS (2017) World Heritage on the Edge. Retrieved 2019/12/13 from https://ohridsos.files.wordpress.com/2017/12/world-heritage-on-the-edge_version-unesco.pdf

20 United Nations, Economic Commission for Europe, Committee on Environmental Performance (2002) Environmental Performance Reviews: The Former Yugoslav Republic of Macedonia. New York, United States and Geneva, Switzerland.

21 Global Water Partnership—Mediterranean Secretariat (2010) 1st National Consultation Meeting Report. Drin Dialogue: Consultation process for the establishment of a Shared Vision for the management of the extended Drim Basin. Athens, Greece.

22 Spirovska, M. et al (2012) State of the Remains of Studenchishte Marsh and Measures for its Revitalization. Dekons-Ema. Drustvo za ekoloski consulting, Skopje, Macedonia.

23 Albrecht, C. and Wilke, T. (2008) Ancient Lake Ohrid: Biodiversity & Evolution. *T. Hydrobiologia* 615: 103.

24 Jordanova, M., Rebok, K., and Rocha, E. (2016) Liver Pathology of Female Ohrid Trout from Eastern Coast of Lake Ohrid: Baseline Data Suggesting the Presence of a Pollution Gradient. *Turkish Journal of Fisheries and Aquatic Sciences*, 16: 241-250.

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

26 JICA (Japan International Cooperation Agency) (2012) Former Yugoslavia Republic of Macedonia Data Collection Survey for Ohrid Lake Environmental Improvement. Nihon Suiko Sekkei Co., Ltd., Tokyo, Japan.

27 Albrecht, C. & Wilke, T. (2008) Ancient Lake Ohrid: Biodiversity & Evolution. *T. Hydrobiologia* 615: 103.



Fig. 1: The Macedonian ambassador to France (left) meets Brazil’s World Heritage Committee delegation leader (right) on 23 May 2019, just 3 days after draft Decision 43 COM 7B.36 was published recommending to place the Ohrid region on the List of World Heritage in Danger. Photo: Twitter @MKambFrance

The resulting WHC Decision 43 COM 7B.36 was in fact the product of mistruths. Far from passing the Law on Management of the Natural and Cultural Heritage of the Ohrid Region, Macedonia postponed the proposed legislation, which may now be abandoned, just days after the 43rd Ses-

28 UNESCO (2019, July 3rd) 43rd Session of the World Heritage Committee (English) 2019-07-03. Retrieved 2019/12/13 from https://www.youtube.com/watch?time_continue=247&v=m40rMmorFTU&feature=emb_title

29 UNESCO (2019) World Heritage Committee 43rd Session: List of Participants. World Heritage Centre, Paris, France.

30 World Heritage Centre (2019) Draft Decision: 43 COM 7B.36. World Heritage Centre, Paris, France.

sion³¹; wastewater system “actions” have been limited to the establishment of a public company, lacking any physical expansion or general restoration of the network; and the Sateska River still pollutes Lake Ohrid daily.

Neither has meaningful progress emerged from tasking institutions with RMM requests. The Commission for the Management of the World Natural and Cultural Heritage of the Ohrid Region, established as late as February 2018, has failed to counter political influence over major decisions regarding urban development³². Meanwhile, RMM Recommendation 6 sought a moratorium on all coastal and urban transformation until planning documents, juridical mechanisms, and functional control systems were put in place. It was enacted two years late on August 8th 2019, but mora-

torium conditions permitted buildings currently under construction to continue; exempted infrastructure; and made provisions for adaptations and changes of use, i.e. conversion of residential buildings to hotels. Previously accepted construction permits were allowed to proceed normally, and, by law, this partial moratorium formally ended in February 2020, even though relevant plans, legislation and control systems were not functionally complete³³ (see Fig 3).

Contrary to Recommendation 9, proliferating illegal constructions have not been brought under control. According to the Municipality of Ohrid’s Mayor Konstantin Georgieski, an inventory counted 1,076 of them, with over 400 in the protected lakeshore green belt zone³⁴, Galichica National Park, and Ohrid’s old town core. Attempts were made to

31 Government of the Republic of Macedonia (2019) From the 146th Session of the Government [...] Municipalities of Ohrid and Struga are given 10 days to prepare an action plan for UNESCO recommendations [...]. Retrieved 2019/12/15 from https://vlada.mk/node/18633?fbclid=IwAR1kuVFmH_pZx-DfaPiHNXfIxzXEDRMC2wc8WVvKta1kRVp-z0S_9bz1TRQc

32 Ohrid SOS (2019) World Heritage on the Edge II: Engine of Neglect, Supplementary Material. Retrieved 2019/12/13 from https://ohridsos.files.wordpress.com/2019/07/world-heritage-on-the-edge-ii_engine-of-neglect_combined.pdf

33 Municipality of Ohrid (2019) Official Bulletin for the Municipality of Ohrid 09.08.2019, Number 10, Year 54. Retrieved (2019/12/14) from https://ohrid.gov.mk/wp-content/uploads/2017/08/Sluzben_glasnik_2019_10.pdf?fbclid=IwAR2C-jtpZVvmHQ_v95XDJTEbhlp08_OMYCPxin98k7LEstZIZNIYehMim_c

34 Chubric, D. (2019) Mayor Georgieski of Ohrid attends UNESCO session in Baku with list of 1,076 illegal constructions. Sakam Da Kazham. Retrieved (2019/12/14) from <https://sdk.mk/index.php/makedonija/gradonachalnikot-na-ohrid-georgieski-so-spisok-na-1-076-divogradbi-odi-na-sesijata-na-unesko-vo-baku/>



Fig. 2: Illegal construction continues at a lakeshore hotel on 3 July 2019, the same day as the Macedonian delegation addresses the World Heritage Committee.

Photo: Ohrid SOS



Fig. 3: Although a construction moratorium has been announced in the Ohrid region on 8 August 2019, it does not cover work at the numerous buildings that are already under construction, here on 26 September 2019. Photo: Ohrid SOS



Fig. 4 and 5: A house on Marko Nestoroski Road which was also supposedly demolished in Sep 2019 was not only still standing in Jan 2020 (Fig. 4) but has now proceeded towards completion Feb 2020 (Fig. 5).

Photos: Ohrid SOS





Fig. 6 and 7: This pair of photos shows how construction progressed from Sep 2019 to Jan 2020 during the supposed moratorium.

Photos: Ohrid SOS



Fig. 8 and 9: Another pair of photos shows the pace of construction during the moratorium. There are many other examples.

Photos: Ohrid SOS

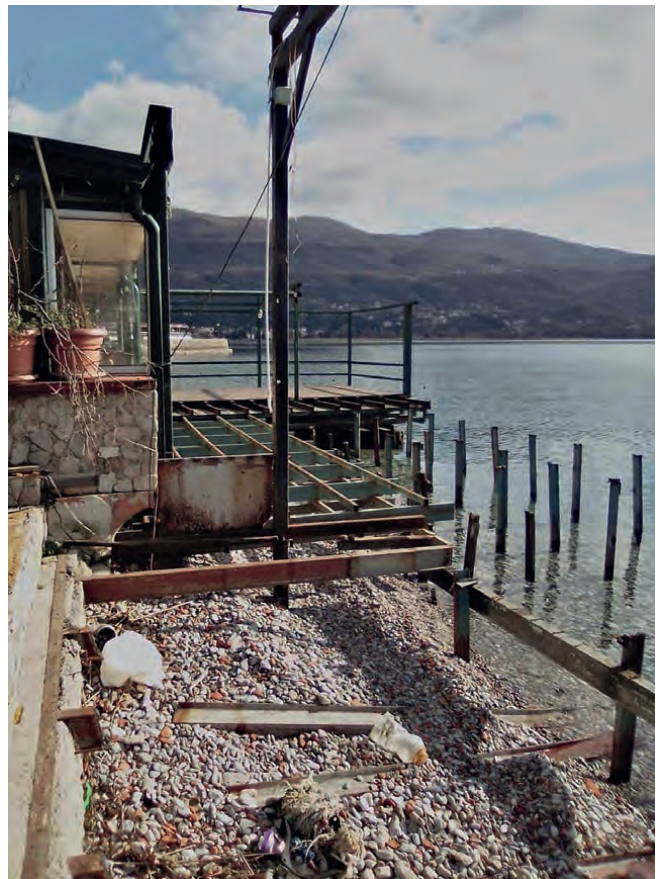


Fig. 10-12: The main structures of platforms allegedly demolished in Sep/Oct 2019 are still standing in Dec 2019.

Photos: Ohrid SOS

legalize some of these structures in 2019, but ceased after public outcry³⁵. Then, amid a busy media campaign, a long-awaited removal of illegal buildings began after the 43rd WHC Session with partial disassembly of lakeshore platforms, yet soon faded to inaction with no solid building removed (see Fig. 10–12).

Some of the issues facing the Ohrid Region could be resolved by the Management Plan, finally adopted some twenty years after a management deficit was identified; five after WHC Decision 38 COM 7B.58 formally encouraged its completion; and two and a half after RMM Recommendation 7 reiterated the request. However, the current version yet contains notorious provisions for temporary constructions and vaguely defined “urban equipment” in high-level protected zones; fails to fully clarify which activities will be permitted where; leaves protection of the Studenchtishte Marsh wetland unresolved; reserves ample space for mass tourism projects and a marina; and has not identified specific legal shortfalls in order to secure Strategic Environmental Assessments’ quality or amend the Law on Penalties to sanction heritage destruction far more strongly.

Several of the plan’s measures only entail production of PDF documents³⁶, and, one, for Ramsar nomination, is currently obstructed by none other than the Macedonian Ramsar Committee and Ministry of Environment and Physical Planning³⁷. Simultaneously, an analysis of cumulative impacts presented in a draft Strategic Environmental Assessment for the Management Plan in line with RMM Recommendation 8 ignores numerous proposals: a cluster of General Urban Plan developments on Lake Ohrid’s east coast; a marina; and a de facto tourism development zone in the village of Lagadin. For those projects that are considered, it does not quantify pressures, such as by estimating car and people numbers from a proposed road and railway, and only discusses impacts on landscape, not biodiversity³⁸.

Thus, the scene is set for the 44th WHC Session to repeat the missteps of the 43rd in Baku 2019. Then, as seen above, the Macedonian delegation leveraged a reversible law, vague orders to institutions, and paperwork relating to wastewater and the Sateska River to convince

an amenable WHC that heritage responsibilities were being taken seriously. This time it will use a flimsy Management Plan, half-measures on illegal construction, and a shrunken moratorium to do the same. All the while, persistent lobbying^{39, 40} and manipulated reporting⁴¹ to the World Heritage Centre cast passive action like the retraction of dangerous planning documents as proactive progress when little actually changes on the ground.

WHC acceptance of this behaviour tacitly endorses mismanagement in the Ohrid Region: On July 12th 2019, just two days after the 43rd WHC session, Mayor Ramiz Merko of Struga, a major WHS municipality, joined Nefi Useini, a Municipality of Ohrid councillor, to open the latter’s illegal newly-built restaurant in Ohrid’s historical centre even though an order for its demolition had already been issued⁴², while, on 1st October 2019, Municipality of Ohrid Mayor Georgieski reassured audiences of television station TVM that regular communication with UNESCO would ensure that construction permissions in the Ohrid Region return to normal perhaps even allowing reassembly of the aforementioned lakeshore platforms. He boasted that an express road plan for Galichica National Park (cancelled due to RMM Recommendation 4) could perhaps be resurrected



Fig. 13: Municipality of Struga Mayor Ramiz Merko (centre right) opens an illegally constructed restaurant owned by Ohrid councillor Nefi Useini (centre left) in Ohrid’s old town core on 12 July 2019, two days after the World Heritage Committee’s 43rd Session has finished.
Photo: Sakam Da Kazham

35 Radio Free Europe, Macedonia (2019) Ohrid Municipality Withdraws Measures to Legalize Illegal Buildings. Retrieved 2019/12/15 from https://www.slobodnaevropa.mk/a/29854784.html?fbclid=IwAR1QqvXnI3Z-98FLWzdy_MJHH1nRLQFiwtO_OWVViBONH2EUot2dIWIHCHYw

36 Ministry of Culture, and Ministry of Environment and Physical Planning, Republic of Macedonia (2019) Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029. Skopje, Republic of Macedonia.

37 Ohrid SOS (2019) World Heritage on the Edge II: Engine of Neglect. Retrieved 2019/12/13 from https://ohridsos.files.wordpress.com/2019/07/world-heritage-on-the-edge-ii_engine-of-neglect_combined.pdf

38 Gradezhen Institut Makedonija (2019) Draft Report of the Strategic Environmental Assessment for the Management Plan of the Natural and Cultural Heritage of the Ohrid Region 2019-2028. Skopje, Republic of Macedonia.

39 Macedonian Ambassador in France (@MKambFrance) “Ravie de rencontrer ma collègue brésilienne à l’UNESCO Maria Edileuza Fontenele Reis @MKembBrazil”. 2019/5/23. Tweet. Retrieved (2019/12/15) from <https://twitter.com/MKambFrance/status/1131499597992517632>

40 Government of the Republic of Macedonia (2019) Minister Ademi and Mayor Georgieski in meeting with UNESCO. Retrieved 2019/15/12 from https://vlada.mk/node/19106?fbclid=IwAR0VeVrBrJGP0BrL8T1g6XFDDQuYqSDs-G4OZ4UbbUrzfZUiyAgwF0Cw_I

41 Ohrid SOS (2019) World Heritage on the Edge II: Engine of Neglect. Retrieved 2019/12/13 from https://ohridsos.files.wordpress.com/2019/07/world-heritage-on-the-edge-ii_engine-of-neglect_combined.pdf

42 Momirovski, G. (2019) DUI councillor opens illegally constructed pizzeria in the protected zone of Ohrid. Telma, Skopje, Republic of Macedonia. Retrieved 2019/12/13 from <https://telma.com.mk/sovetnikot-na-dui-ja-otvori-pit-serijata-divogradba-vo-zashtiteniot-del-na-ohrid/>

too⁴³. One wonders what message these and others will take from the next WHC session.

Conclusions and Suggestions

Given expert advisory body opinions, copious peer-reviewed material and civil sector reports, all of which strongly indicate that the Ohrid Region is World Heritage in Danger, the WHC's choice at its 43rd Session to ignore the property's dire trajectory can only be interpreted as emerging from political considerations⁴⁴, lobbying, and/or incompetence. Strengthening WHC capacity and immunizing it against undue political influence are therefore priority suggestions for improvements in World Heritage Convention functioning such as:

- Total WHC alignment with Article 9 of the World Heritage Convention to ensure that the committee is comprised of experts, not political figures;
- Systematic limitations to be placed on lobbying, such as by sealing World Heritage Centre draft decisions until WHC sessions begin with all processes/discussions from their release to finalization conducted in public and on camera so as to reduce the scope for backstage deals between States Parties;
- Strict delineation of and adherence to RMM and WHC deadlines;
- Greater precision in Ohrid Region RMM recommendations to minimize manipulation (e.g. conditioning the moratorium with specific, quantifiable targets for eutrophication and provisioning for its re-enactment if they are missed);
- State Party establishment of a specific, expert-comprised, independent transboundary management body for the Ohrid Region, explicitly designed to circumvent harmful political influence at the municipality level; and
- Placement of the Ohrid Region on the List of World Heritage in Danger.

⁴³TVM Televizija (2019, Oct 1st) Questiontime: Demolition of Illegal Buildings in Ohrid. Retrieved 2019/12/13 from <https://www.youtube.com/watch?v=IKL8WsYC-6cA&feature=youtu.be&t=4562&fbclid=IwAR2zoPleM6Aiy3Ct7VRRhBeoWHj9SRACHL7JN9mh0kA2o6Wgr2QDIU6IFU>

⁴⁴Meskill, L. (2014) States of Conservation: Protection, Politics and Pacting within UNESCO's World Heritage Committee. *Anthropological Quarterly*, Vol. 87, No. 1, p. 217-244.

Community Perspectives on State – UNESCO Management of Bali’s World Heritage Site

Wiwik Dharmiasih, Udayana University

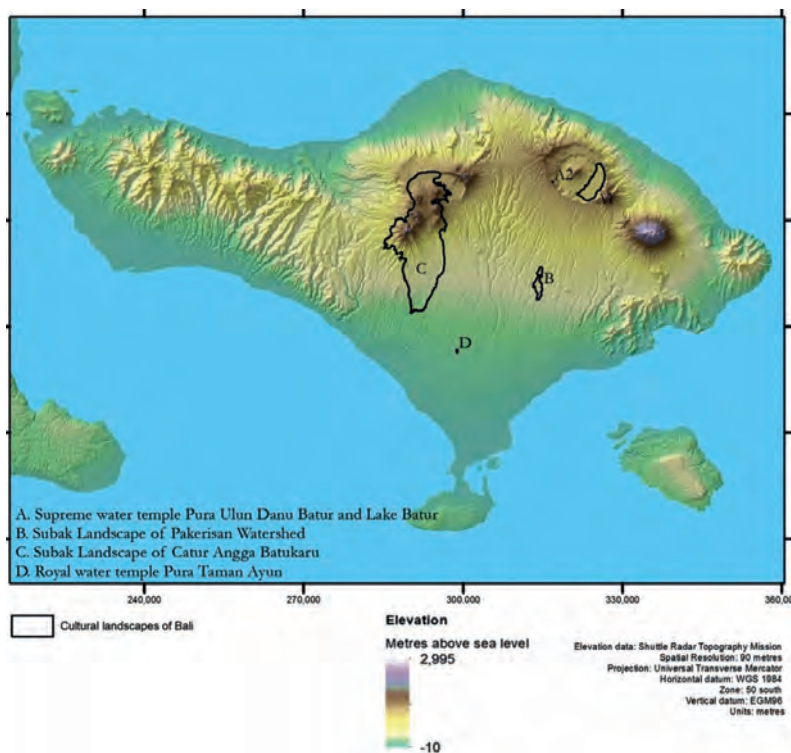


Fig. 1: The Subak Landscapes of Bali World Heritage Site.

Map: Ministry of Culture and Tourism and Government of Bali Province 2011

The UNESCO World Heritage Site (WHS) in Bali is a living cultural landscape inscribed in 2012. Inscription was viewed as a way to protect against the increasing vulnerability of the *subak* system. The *subak* system is a traditional form of community water management that shapes much of Bali’s agrarian landscapes. It embodies what UNESCO has identified as the Outstanding Universal Value (OUV) of the traditional farming systems of Bali as the manifestation of Tri Hita Karana, which is the overarching philosophy of the Balinese. The philosophy guides the way people interact with one another, provides a framework for living sustainably with the environment, and also supports pathways to spiritual connection.

The WHS – also known as the Cultural Landscape of Bali Province – is located across five different districts in Bali, and consists of a complex system of interconnected land and natural resources that begin among the forests and lakes in the upstream areas, traversing through the network of

water-related temples that mark the sites that farmers convene to divide water for their rice production practices (see Fig. 1). Although there are many more *subaks* across Bali, the inscribed WHS includes 23 *subaks*, and one of them (Subak Jatiluwih) has become the iconic WHS viewing site. In this article, I begin by describing management challenges from an institutional perspective, articulating the problems and solutions as formulated by UNESCO and state counterparts. Second, I turn to the substantial changes taking place at the site in Jatiluwih, highlighting concerns from local perspective. Overall, I argue that UNESCO needs to provide more meaningful platforms for communities to shape the outcomes of WHS management, and therefore needs to establish new approaches for increasing local participation.

The UNESCO – State Management Plans and Approaches

When the site was inscribed, UNESCO (2012) identified five factors affecting the property, including: i) the overall vulnerability of the *subak* system, ii) inadequate funding for traditional farming systems, iii) limited management plans to protect water resources, iv) development pressures, and v) lack of integrated governance systems to manage the property. The government responded with a series of interventions, which were presented to UNESCO as part of their responsibilities for fulfilling management roles to maintain the status.

The government, overseen by the Ministry of Education and Culture and the Bali provincial government, coordinated various agencies to develop a management plan. The Bali Governor’s office signed a decree creating a multi-agency Governing Assembly for site management, followed by the establishment of a detailed action plan (MCTGBP, 2011). However, due to the numerous agencies involved, coordinating all the parties proved difficult across their institutional mandates and jurisdictions, and competing interests.



Fig. 2: Subak Jatiluwih.

Photo: Wiwik Dharmiasih

Therefore, the government enacted communication and coordination forums to complement the Governing Assembly as a way to bridge discussions across institutions, and sought to overcome the limited participation among local community institutions, including farmers, customary villages, and temples (UNESCO, 2015). However, the expectation was that the forum would emerge organically to more easily express local concerns to the government. One local network emerged: a farmer network called Catur Angga Batukau (CAB) Forum, which consisted of leadership from 20 *subaks* (Royo et al., 2016). The CAB Forum initially held meetings, but it remained dependent on existing bureaucracies. Therefore, although the intent to involve local voices initially gained traction, the lack of a formal mandate led to the gradual inactivity of the communication and coordination forum.

The government continued to conduct interventions to address management challenges identified by the UNESCO Advisory Body (ICOMOS/ICCROM, 2015). One activity included a participatory mapping effort to improve *subak* protection by involving *pekaseh* (*subak* leaders) to map out water sources (Dharmiasih and Arbi, 2018). Participatory mapping was a strategic way to involve local land and water managers (the *pekaseh*). Nevertheless, the mapping was not integrated into the action plan overseen by the Governing Assembly. A second initiative involved local stakeholders in tourism planning, and UNESCO facilitated the publication of a Sustainable Tourism Strategy (STS) (UNESCO, 2016). The STS helped identify local attractions for developing more responsible tourism, particularly at locations undergoing rapid changes at the core zones. The process also helped to generate active participation among the community about tourism development, but there was no further follow up after publication. These two examples tried to address overall management issues affecting the property. However, when seen from local perspectives at the core zone in Jatiluwih, such initiatives fall short of the

initial stated interests of designation to empower the *subak* and has become a cause for concern among locals.

Division among locals on “mushrooming” land use change

Since inscription, the number of visitors to Jatiluwih grew significantly (Dharmiasih, 2019). To accommodate this rapid change, new facilities emerged to shape the visitor experience. One major debate among the community revolved around the placement and construction of a parking lot. A parking lot was eventually built on productive rice fields, resulting in others seeking opportunities to convert rice fields. Outsiders noticed opportunities for investing in tourism development by working with local landowners, and various government branches also encouraged such initiatives. Several larger tourism projects drew attention, such as the construction of a helipad in a productive rice field. Although briefly operational, the helipad was quickly deactivated after gaining media attention. An annual festival, an open theater, and other more intensive visitor experiences are newer tourism experiments, changing the overall landscape.



Fig. 3: Tourism facilities.

Photo: Wiwik Dharmiasih

Meanwhile, local farmers also attempt to benefit from the rapid changes taking place around them. Some began setting up stalls within their rice fields and competing to sell snacks and local products. Between the larger tourism initiatives and these smaller ones, local farmers describe the changes as a “mushrooming” effect that has taken over. This has created a division among the community about future tourism development. Local farmers describe this division between two different perspectives: development versus conservation. The development perspective consists of farmers that believe if they do not invest in tourism now, they will miss the opportunity to benefit from the lucrative economic development taking place. For these farmers, they begin starting small, establishing a stall to sell snacks

and drinks. If successful and allowed to continue, they will invest in more established structures in their rice fields, diversifying products.

On the other hand, the conservation perspective points to the widespread violation of local customary laws – the *awig-awig* – which prohibit changing rice fields and water management structures. They argue these changes not only violate the *awig-awig*, but also infringe upon the formal laws on green corridors. These laws are systematically ignored even though there are information boards throughout the site. Local conservationists also complain about the negative externalities affecting Jatiluwih, namely in the form of reallocation of water, waste and pollution from restaurants and villas, and the overall pressures from a constant stream of visitors.



Fig. 4: Land change policy.

Photo: Yudha Bhismaya

Pressures on subak infrastructure and overlooking local farmers

The increasing number of visitors and prioritization of tourism has also shifted attention away from the broader interests of empowering the subak. This is especially evident from the usage and maintenance of *subak* roads and facilities, which are being repurposed for tourism and neglected elsewhere. The main trekking route for visitors in Jatiluwih consists of walking along a subak road through the rice fields. Throughout the day, farmers are impeded from passing, which has over time led to tensions between farmers and tourists. This road is indeed well maintained, but the overwhelming attention on this subak road has also redirected resources from pressing infrastructure and maintenance needs for farmers elsewhere.

Farmers regularly complain of the crumbling pathways to their rice fields and the lack of support for irrigation infra-



Fig. 5: Tourism challenges.

Photo: Wiwik Dharmiasih

structure. The poor infrastructure conditions incur additional burdens on local women due to their role during harvests, requiring additional trips to transport yields. In several areas, regularly used roads connecting farmers to rice fields have become especially dangerous. Landslides on *subak* roads pose a significant hazard, but which local farmers continue to regularly use because they have no other choice. Even when infrastructure support for construction and maintenance is allocated by the government, farmers express that it is not always allocated with highest priority, and disbursements are often late. Farmers also state that construction of local infrastructure and facilities should more actively involve them in the planning and maintenance processes, as they are well positioned to understand local conditions, ensuring that investments are timely and functional.

In more general terms, the subak has experienced significant pressures since the 1970s. The green revolution



Fig. 6: Farmers.

Photo: Wiwik Dharmiasih

and subsequent government programming introduced mechanisms that shifted away from a traditional form of organic agriculture and created a system dependent on chemical inputs and pesticides. One central objective of WHS inscription was to empower *subaks* to reinstate the traditional organic agricultural systems. Though there have been programs to support organic agriculture, they are few and far between. To date, there is only a handful of local farmers committed to organic principles, and local farmers believe too many obstacles stand in the way of making this change. This is yet another example of how priorities of WHS management, are much more focused on tourism rather than prioritizing local subak interests.

Conclusion: Divergent interests

In some ways, the Indonesian government systems have been forthcoming in responding to the management challenges as initially identified by UNESCO. Nevertheless, approaches by the state continue to scale up initiatives in the form of government policy responses, such as the recent efforts to push for a National Strategic Area supported through a presidential decree. Most recently, UNESCO communication has also requested the state party “to conduct a heritage impact assessment for all new developments within the property and its setting, particularly at Jatiluwih” (UNESCO, 2019). While such approaches by UNESCO and the state suggest urgency for implementing the management plan, these solutions only serve to further the divide from addressing challenges experienced by local people. This is because these formalized channels privilege bureaucratic reporting requirements and do not have the mechanisms for meaningfully engaging local farmers in addressing their concerns. Farmers committed to local cultural practices and strengthening the *subak* systems have for years sought an outlet for responding to the initial impetus for recognition. As one farmer recently asked me, “If UNESCO

could see what this place looks like now, would they still think it worth protecting?”

References

- Dharmiasih, Wiwik and Yunus Arbi 2018, Management of the Cultural Landscape of Bali Province in Fits-and-Starts, World Heritage Watch Report 2018, World Heritage Watch, Berlin, pp. 108-110
- Dharmiasih, Wiwik 2019, Management in Question at the Cultural Landscape of Bali Province, World Heritage Watch Report 2019, World Heritage Watch, Berlin, pp 79-81.
- ICOMOS/ICCROM 2015, *Report on the ICOMOS/ICCROM Advisory Mission Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy (Indonesia) (C 1194rev)*. Available from: <<http://whc.unesco.org/en/documents/136458>> [11 December 2019]
- Ministry of Culture and Tourism and Government of Bali Province (MCTG8P) 2011, Cultural Landscape of Bali Province, Nomination for inscription on the UNESCO World Heritage List. Available from: <<http://whc.unesco.org/uploads/nominations/1194rev.pdf>> [11 December 2019]
- Royo, Antoinette, Wiwik Dharmiasih, and Yunus Arbi 2016, “Forum Pekaseh in the Management of Subak Landscape of Catur Angga Batukaru, UNESCO World Heritage Sites in Bali” in Verschuren, B., & Furuta, N. (Eds.). (2016) *Asian Sacred Natural Sites: Philosophy and practice in protected areas and conservation*. Routledge. pp. 130-142
- UNESCO 2012, WHC-12/36.COM/19, *Convention Concerning the Protection of the World Cultural and Natural Heritage – Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy (Indonesia)*. Available from: <<http://whc.unesco.org/archive/2012/whc12-36com-19e.pdf>> [12 December 2019]
- UNESCO 2015, WHC-15/39.COM/7B.Add, *Convention Concerning the Protection of the World Cultural and Natural Heritage – Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy (Indonesia)*. Available from: <<https://whc.unesco.org/archive/2015/whc15-39com-7BAdd-en.pdf>> [12 December 2019]
- UNESCO Office Jakarta 2016, Sustainable Tourism Strategy. The Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy, Jakarta, Indonesia
- UNESCO 2019, WHC/19/43.COM/7B, *Convention Concerning the Protection of the World Cultural and Natural Heritage – Cultural Landscape of Bali Province: the Subak System as a Manifestation of the Tri Hita Karana Philosophy (Indonesia)*. Available from: <<https://whc.unesco.org/archive/2019/whc19-43com-7B-en.pdf>> [12 December 2019]

Fires Pose Catastrophic Threats to Ancient Rainforest in the Tasmanian Wilderness

Geoff Law, The Wilderness Society, Australia



Figure 1. A stand of Gondwanic vegetation consisting of the palaeoendemic species pencil pine (from the genus *Athrotaxis*, little changed since the Cretaceous) and deciduous beech (Australia's only winter-deciduous tree). If burnt in a severe fire, this vegetation will not recover.
Photo: Rob Blakers

Australia was aghast in early 2020 as fires raged across thousands of kilometres of the eastern seaboard of the continent. More than 30 people were killed. Small towns were destroyed. Tens of thousands of people were evacuated. Millions of hectares of native vegetation were incinerated. Half a billion native animals and birds perished. And rainforests in national parks burnt for the first time in recorded history.

Serious impacts were inflicted on two World Heritage properties – the Greater Blue Mountains and the Gondwana Rainforests of Australia. The latter is a serial property consisting of 41 separate reserves scattered across hundreds of kilometres. In the Blue Mountains property, strenuous efforts by park managers saved an irreplaceable stand of Wollemi pine from the flames. Studies are underway to determine the full extent of the damage to these two properties.

Warning signs about the severity of the 2020 fire season abounded in the months before the outbreaks. Retired and present heads of professional fire-fighting agencies told governments that this fire season would be a horror. An extended drought had left huge stands of forest in a weakened and flammable condition. Modelling carried out by climate scientists in government agencies foretold of the coming disaster. And, as far as World Heritage properties

are concerned, the previous year in Tasmania was a harbinger of what was to be visited on the mainland. This article gives a brief description of the bushfires of 2019 in Tasmania and their threats to the Outstanding Universal Value (OUV) of the island's World Heritage Area.

The Tasmanian Wilderness is inscribed on the World Heritage List under seven criteria, including all four natural criteria. Amongst the attributes that help the property qualify are primeval rainforests, exquisite alpine vegetation, conifers whose lineage goes back to the supercontinent Pangea, some of the world's most long-lived organisms (such as the Huon pine, with ages up to 3,000 years old), and huge eucalypt trees. The wilderness condition of the landscape contributes both to OUV and the integrity of the property.

In late December 2018 and in mid-January 2019, wildfires in and around the Tasmanian Wilderness were ignited by dry-lightning strikes (see Fig. 2). The fires merged to form large, uncontrolled blazes that eventually burnt approximately 95,000 ha (around 6%) of the Tasmanian Wilderness (PWS 2019, Australia 2019), as illustrated in Fig. 6, including about 12,000 ha of fire-sensitive vegetation that will probably never recover.

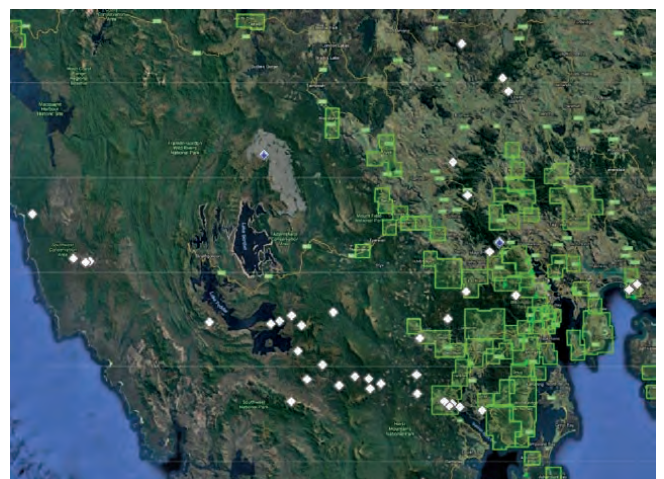


Fig. 2: The white diamonds show ignition points, mostly from lightning strikes on 15 January 2019. Many of these fires merged to form mega-fires with huge fire fronts.
Map: Tasmania Fire Service

The 2019 fires followed similar outbreaks caused by lightning in 2008, 2010, 2013 and 2016. In 2016, for example, 19,800 ha of the World Heritage property was burnt (Australia 2017). Since the year 2000, virtually 100% of the area burnt by uncontrolled fires within the World Heritage property has been ignited by lightning, compared with a negligible amount in the previous 30 years (Pyrke 2013). There is broad agreement amongst ecologists that this dramatic transformation of Tasmania’s fire regime is the result of climate change. Of huge concern is the fact that, in both 2016 and 2019, Tasmania’s most important stands of Gondwanic vegetation (see Fig. 1) faced catastrophic loss. Fires raged uncontrolled throughout the landscape, frequently upwind of critical stands of Huon pine, deciduous beech, King Billy pine and pencil pine. If there had been a spate of days with high winds and temperatures above 35 degrees then these ancient life forms would have been permanently obliterated.

As it is, the fires have had the following actual impacts:

- Incremental loss (over 600 ha) of ancient stands of conifers such as Huon pine, pencil pine and King Billy pine;
- Important stands of oldgrowth eucalypt forest have been damaged (over 12,000 ha);
- Numerous catalogued giant *Eucalyptus regnans* trees – the tallest flowering plants on Earth – have been destroyed;
- Organic soils have burnt down to bedrock in some areas, with some mounds of peat having been depleted by at least a metre (Australia 2019).



Fig. 3: Plume of smoke from the Gell River fire within the World Heritage property, 4 January 2019
 Photo: www.worldview.earthdata.nasa.gov

It is essential to place recent impacts into a longer-term context. Approximately 200,000 ha of the property (around 13%) have been burnt in summer wildfires since 2008. This spate of fires raises the following concerns:

- The frequency and significance of fires associated with dry-lightning strikes has escalated dramatically since the year 2000;
- Over 10% of the World Heritage property has burnt since 2008;

- Increasing dryness of vegetation within the property during the bushfire season appears linked to climate change (Press 2016);
- While the majority of the vegetation burnt is ‘fire-adapted’, the fires have also posed catastrophic threats to critical stands of ancient, fire-sensitive species that have existed since the Cretaceous because of the area’s previously reliable cool, wet conditions;
- This threat to a major component of the property’s OUV is escalating.



Fig. 4: Blackened, burnt and dead vegetation on the slopes of Mt Bobs impinges on one of Tasmania’s greatest stands of King Billy pine forest. These palaeoendemics have persisted since the Cretaceous but if killed by a severe fire will not grow back.
 Photo: Rob Blakers, March 2019

The seriousness of the threat of fires to the property’s OUV has been acknowledged by the 2016 Management Plan (Tasmania 2016), the IUCN World Heritage Outlook (IUCN 2017), the State Party (Australia 2017) and the World Heritage Committee (40 COM 7B.66). Nevertheless, during the fires themselves, government agencies often downplay the catastrophic threat posed by the fires to the property’s OUV, describing most of the vegetation being burnt as fire-adapted and capable of recovery. They frequently seem to be in denial about the catastrophic threat posed to alpine and Gondwanic vegetation. Moreover, it is not desirable even for ‘fire-adapted’ vegetation to burn at the height of summer, as intense fires threaten the very soils on which



Fig. 5: Terrain that burnt severely in January and February 2019. The fire has clearly burnt the organic soils, exposing the mineral substrates. Forest along streams has largely been killed.
 Photo: Rob Blakers, March 2019



Fig. 6: Fires in western Tasmania, February 2019. The fires eventually burnt almost 100,000 ha (6%) of the World Heritage property.

Map: Tasmania Parks and Wildlife Service / Andrea Martinez

tralia, increasing the threat to the Tasmanian Wilderness. The State Party was called upon to report annually to the World Heritage Committee.

The government did report on fires in its most recent reports to the Committee (Australia 2016, 2017, 2019). In 2016, the impacts and threats were downplayed. The 2019 report said that 12% of the country burnt consisted of fire-sensitive vegetation. Specific sites were identified that had suffered severe damage. It said that important stands of oldgrowth *E. regnans* forest and ‘a number of giant trees’ had been ‘affected’. In this case, ‘affected’ actually means destroyed. The report insulted the intelligence of readers when it said that the tall forests will recover ‘given long fire-free intervals’. As if that is going to happen!

much of the vegetation grows. In places, organic soils have burnt down to bedrock (see Fig. 5). It has been up to conservation groups to bring these threats to the property’s ancient life-forms to public attention.

Tasmania’s fire-fighting agencies, their staff and their volunteers have dedicated major resources, skill and commitment to fighting these fires as they occur. However, the response of governments between fire seasons has been severely lacking. Important recommendations arising from inquiries into the fires have not been implemented by government. For example, the proposal to develop a remote-area volunteer fire-fighting capacity (AFAC 2016, 2019) has languished. Similarly, proposals to bolster aerial fire-fighting capacity have not been implemented. As a result, fire-fighting agencies have frequently been overwhelmed by the number of fires burning uncontrolled in remote areas.

In 2016, a Committee of the Australian Senate held a public inquiry into the fires of that year. Recommendation 1 of its report called on the Australian Government to acknowledge that fire conditions have worsened in South-East Aus-

The wishy-washy language employed by the State Party is a deliberate attempt to disguise the damage done and the escalating threat. Everyone knows that climate change is only going to get worse in the foreseeable future. Bushfires will increase in severity, frequency and extent. The State Party knows this but is attempting to avoid its responsibilities.

The State Party of Australia is therefore called upon to:

Acknowledge the catastrophic and worsening threat posed by wildfire to rainforests, alpine vegetation, native conifers, oldgrowth forests, giant trees and other fire-sensitive vegetation, a critical component of the OUV of the Tasmanian Wilderness.

Bolster fire-fighting capacity in Tasmania, particularly when it comes to first-strike capacity in remote areas. To achieve this, it should organise multi-stakeholder forums in which a range of fire-fighting strategies and tactics can be explored. Additional funding is required.

Address climate change by reducing Australia's emissions and by reducing exports of fossil fuels such as coal and gas.

The island of Tasmania escaped the devastating bushfires suffered by mainland Australia in early 2020. Similarly, the fires of 2016 and 2019, for all their seriousness, did not inflict the damage feared by many at the height of the outbreaks. However, these events confirm the modelling. Wildfires with potentially devastating consequences will become a regular event in the summers to come, threatening ancient life forms that constitute a major part of the OUV of the Tasmanian Wilderness.

References

- AFAC 2016, *AFAC INDEPENDENT OPERATIONAL REVIEW A review of the management of the Tasmanian fires of January 2016*, Australasian Fire and Emergency Service Authorities Council Limited Melbourne, Australia, <https://www.fire.tas.gov.au/userfiles/tym/file/misc/1604_tasfirereport_final1.pdf>.
- 2019, *AFAC INDEPENDENT OPERATIONAL REVIEW A review of the management of the Tasmanian fires of December 2018 – March 2019*, Australasian Fire and Emergency Service Authorities Council Limited, Melbourne, <http://www.fire.tas.gov.au/userfiles/AFAC/AFAC_Review.pdf>.
- Australia 2016, *State Party Report on the State of Conservation of the Tasmanian Wilderness World Heritage Area (Australia)*, Australian Government, viewed 16 April 2018, <<https://www.environment.gov.au/system/files/resources/22187ad7-c13d-4ff9-a77c-9fccbb4e9f5d/files/tas-state-party-report-2016.pdf>>.
- 2017, *State Party Report on the state of conservation of the Tasmanian Wilderness World Heritage Area (Australia)*, Commonwealth of Australia 2017, Canberra, <<https://www.environment.gov.au/system/files/resources/cc-1913ce-a977-4f13-954f-deea532575d8/files/tas-state-party-report-2017.pdf>>.
- 2019, *STATE PARTY REPORT ON THE STATE OF CONSERVATION OF THE TASMANIAN WILDERNESS WORLD HERITAGE AREA (AUSTRALIA)*, Australian Government, Paris, <<https://whc.unesco.org/en/list/181/documents/Australia>, Po 2016, *Response to, and lessons learnt from, recent bushfires in remote Tasmanian wilderness*, Parliament of Australia, viewed 23 March 2016 2016, <http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Tasmanian_Bushfires>.
- IUCN 2017, *IUCN World Heritage Outlook - Tasmanian Wilderness*, IUCN, viewed 29 March 2019, <<https://www.worldheritageoutlook.iucn.org/explore/sites/wdpaid/5000>>.
- Press, A 2016, *Tasmanian Wilderness World Heritage Area Bushfire and Climate Change Research Project*, Department of Premier and Cabinet, Hobart, Tasmania, <http://www.dpac.tas.gov.au/__data/assets/pdf_file/0008/313010/Final_Report_TWWHA_Bushfire_and_Climate_Change_Research_Project_December_2016.pdf>.
- PWS 2019, *PWS Fire Update - Friday 22 February 2019*, Tasmanian Parks and Wildlife Service, viewed 20 March 2019, <https://www.parks.tas.gov.au/index.aspx?sys=News%20Article&intID=3909>
- Pyrke, AJ, G 2013, *Case study — Fire management in the Tasmanian Wilderness World Heritage Area; Monitoring and Reporting System for Tasmania's Parks and Reserves*, Parks and Wildlife Service, Hobart.
- Tasmania 2016, *Tasmanian Wilderness World Heritage Area Management Plan 2016*, Department of Primary Industries, Parks, Water and Environment, Hobart, [http://dpipwe.tas.gov.au/conservation/tasmanian-wilderness-world-heritage-area-\(twwha\)/twwha-management-plan](http://dpipwe.tas.gov.au/conservation/tasmanian-wilderness-world-heritage-area-(twwha)/twwha-management-plan)

IV. Historic Cities and Urban Ensembles

Liverpool Maritime Mercantile City

Gerry Proctor, Engage Liverpool



Fig. 1: Aerial view of the Bramley-Moore Dock. The site of the planned stadium is outlined in red.
Photo: Richard Hook/Property Week



Fig. 2: The World Heritage property of Liverpool. The site of the planned stadium is outlined in yellow.
Map: Engage Liverpool

This year 2020 is literally crunch time for Liverpool's World Heritage Site (WHS) status. As a civil society organisation, Engage has no idea what the final decision will be or indeed what the recommendation from UNESCO will be to the World Heritage Committee (WHC). We do know that this has been quite an unequal match where an organisation that is citizen-based and resident-led with no funding stream to support the work is up against not only a Premiership football team with huge and passionate support in the city but The Peel Group which is one of the largest landowners in the UK, with its parent company based in the low-tax jurisdiction of the Isle of Man. Its influence on everything in the north of England is enormous and undisputed¹.

It has been their quite justified determined approach to see the Liverpool Waters site developed and it seems that early on in the process someone suggested that it would be advantageous for them to close-off the view in the northernmost part of Central Docks of the on-going industrial port operations that was thought to present an obstacle to the desirability and appeal of potential future residential developments coming forward along that northern border of Bramley Moore Dock. Relocating a new stadium for Everton FC was a stroke of genius - giving them the visual barrier

they required to make the rest of the derelict dock site attractive to developers and giving the project instant massive public support from an exceptionally loyal fan-base and at the same time compromising any politician or civic leader who wanted to oppose the potential loss of UNESCO status as a result.

Everton FC have now submitted their much-anticipated application for the new stadium at Bramley Moore Dock² in Liverpool's UNESCO World Heritage Site. The question now is will that mean the loss of the status? In support the

1 <https://www.ft.com/content/497be3f0-da7f-11e7-a039-c64b1c09b482>

2 <https://www.evertonfc.com/news/1624932/get-the-lowdown-on-evertons-new-stadium-planning-application>



local media the Echo reported positively about their plans to combat the perceived threat to the WHS status³. This of course will only finally be resolved by the World Heritage Committee in its next session.

The planning application for the stadium went live in the city on Friday 21st February 2020, and though it will take some time for many people to review all the information, some initial comments and links are helpful. For those interested, as we are, in the heritage value of the dock, the following four documents drawn up by KM Heritage⁴ are particularly valuable:



- Appendix 18.1: Heritage Statement
- Appendix 18.2: ICOMOS Assessment (Part 1 of 3)
- Appendix 18.2: ICOMOS Assessment (Part 2 of 3)
- Appendix 18.2: ICOMOS Assessment (Part 3 of 3)⁵

These really are exceptional documents for those concerned about the history and heritage of the dock system, and we think they are probably unparalleled in their accuracy and ability to gather together in one place such a wealth of material pertinent to the location and especially the value of the site for future generations.

The document we want to look at is Appendix 18.2: ICOMOS Assessment (Part 3 of 3) and we would like to focus on some elements of the report:



- 7.68: The **waterbody** is clearly an important element of the listed structure's setting and significance, as is the dock's interconnection with the surrounding docks. The structures and artefacts surrounding the dock also form part of its setting – to greater and lesser degrees of significance.
- 7.69: Its contribution to the OUV of the WHS is considered to be **Very High**.
- 9.12: Despite the considerable mitigation integrated into the proposals and described above, it is regarded that the impact of the proposal on the significance of the designated heritage asset would be substantial.
- 9.14: The proposals will encompass all of the dock and replace the majority of the waterbody with the stadium and associated buildings and functions. The impact will be **permanent**, although technically reversible and will be a **major change to the contribution to the OUV of the WHS**.

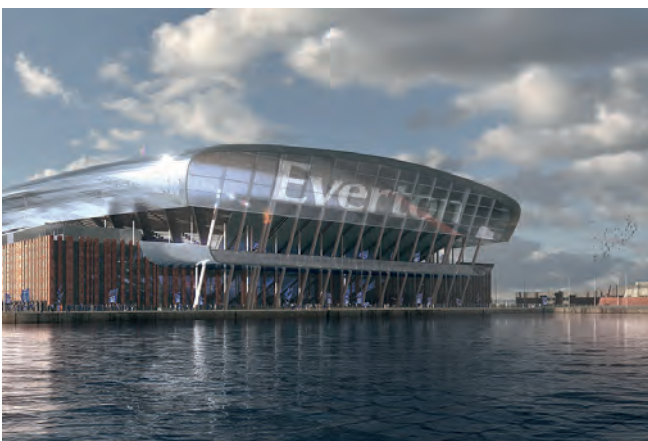


Fig. 3–6: Computer animations of the planned FC Everton stadium.

Source: Courtesy FC Everton

³ <https://www.liverpoolecho.co.uk/sport/football/football-news/evertons-plans-combat-world-heritage-17945588>

⁴ <http://www.kmheritage.com/>

⁵ <https://www.engageliverpool.com/news/everton-fc-submit-planning-application/>

- 9.15: It is considered that the impact on Bramley Moore Dock will be **Major Adverse** and therefore the overall effect would be **Very Large and Adverse**.
- 9.27: The impact on the contribution that the **wall** makes to the OUV of the WHS would be Minor when the extent of the wall in its totality is taken into consideration.
- 9.31: The proposed new stadium is also regarded as having a **Minor** impact on the setting of the wall. The proposals in the backdrop will not fundamentally alter the purpose and function of the wall to provide a barrier.
- 9.43: It is considered that the impact that the change of use will facilitate (on the Hydraulic Engine House) is a **Major Benefit** to the building and will lead to a scale and severity of change that would be **Very Large and Beneficial**.
- 9.55: The **stadium will be a prominent, contemporary, positive new structure**, its brick and steel design in keeping with the local vernacular.
- 9.166: With regard to **views across the River Mersey** towards the WHS, these are illustrated in views 22, 23 & 24 of the TVIA. In views 23 & 24 – which are those closest to the proposal Site, the Key Landmark Buildings in close proximity to the proposal – the Stanley Dock complex, dominated by the Tobacco Warehouse, and the Victoria Clock Tower – all retain their prominence, integrity and authenticity. The proposal will introduce a structure that is not traditionally ‘dock related’ into the dock context. However, **the approach to the façade treatment of the stadium – with the brick facades ensuring that the structure has its origins in the warehouse architectural typology ‘grows out of’ the Dock and its wider context**. The stadium will be a prominent, contemporary, positive new structure but its brick and steel design are in keeping with the local vernacular and in keeping with the tradition of strong, muscular buildings that define Liverpool’s prosperity and success.
- 9.169: The proposals would have an impact on the **overall integrity and authenticity of the WHS** however it is considered that this impact is **Minor**. The proposals will lead to a change to key historic building elements, such that the overall asset is slightly different.
- 9.173: Therefore, it is considered that whilst the proposals would have a Major Adverse impact on heritage assets within the site and a Moderate Adverse impact on the Stanley Dock Conservation Area, the impact on the authenticity and integrity of the whole WHS would be Minor Adverse. The Bramley Moore Dock site is one of the series of inter linked docks in a part of the WHS that is currently predominantly vacant/derelict and **whilst the proposal will significantly modify the Dock** and associated heritage assets and elements of its setting, **the overall understanding of the dock construction and port management of which it forms part, will still be appreciable and understandable**. The proposals would also enable the repair and re use (and thus better appreciation of) an important heritage asset that contributes to OUV but has been derelict for decades and open up to the public a part of the WHS that has been privately operated and securely closed.
- 10.5: As well as considering the impact of the proposals on each asset, it has been assessed that the significance of the effect or **overall impact on the overall WHS resulting from the Proposed Development would be Moderate/Large Adverse**. This is based on a Minor Adverse Impact on the Very High value attributed to the WHS.
- 10.6: **The proposals offer a considerable number of heritage benefits to the WHS**, most notably the repair and viable re use of the Hydraulic Engine House and also opening up this part of the WHS to the general public to allow for a greater appreciation of its value. Other substantial benefits that derive from the proposal are outlined in the Heritage Statement and the Planning Statement.

The Desired State of Conservation Report (DSOCR 04.02.20)⁶ submitted by the UK Government is without any reference to the Everton FC / Bramley Moore Dock planning application as that was submitted a fortnight later. It does however reference the new proposals for a North Shore Vision which were recently released. It is quite hard to know what is really going on with the new vision emerging from Peel Holdings and the City Council and incorporating plans for the Central Docks as well as Ten Streets and the Stanley Dock Conservation Area for the first time⁷. It is an excellent vision and references everything that the city ought to have been doing for the past 15 years or more.

The North Shore Vision draws upon UNESCO’s highly acclaimed 2011 Historic Urban Landscape (HUL) Recommendation⁸ which is a magnificent document used world-wide to guide those with responsibility for developing within WHS locations⁹. The Liverpool plan also references the UN Sustainable Development Goals¹⁰ which is admirable, and they make an appearance on the local scene for almost the first time in an official report. There is everything to like about the vision and the plan, but one wonders why it has suddenly come to the fore just when we are at the cusp of being deleted from the World Heritage List.

There is no doubt that there are some very good people in the city who indeed have a sincere desire to see Liverpool hold onto its UNESCO status, and maybe their voices are being listened to for the first time, but cynics have said that if the World Heritage Committee decides they have gone as far as they can with the city and remove our status, this report enables the Mayor and others to show the city and the world in a positive light with their widely-respected and

6 <https://www.engageliverpool.com/wp-content/uploads/2020/02/DSOCR-7A-UK-Liverpool-20200204-public.pdf>

7 <https://liverpoolexpress.co.uk/liverpool-sets-out-plan-to-retain-world-heritage-status/>

8 <https://whc.unesco.org/en/hul/>

9 <http://historicurbanlandscape.com/themes/196/userfiles/download/2016/6/7/wirey5prpznidqx.pdf>

10 <https://www.un.org/sustainabledevelopment/sustainable-development-goals/>

visionary plan being rejected by an ambassadorial elite, UN experts, heritage officials and worse, decision-makers from outside the UK, and in our current Brexit atmosphere this is a line that is likely to go down well with the general population.

It is not clear to Engage if the KM Heritage consultant's report has the backing or agreement of ICOMOS but nonetheless it seems on balance to place the proposed stadium in a favourable position with regard to the OUV of the entire WHS, whilst acknowledging that the stadium plan impacts negatively to a very significant degree on the OUV of the Bramley Moore Dock area itself. Liverpool's WHS is much larger than the disputed dock and it is clear that the city is pinning its hope on the fact that when everything is taken into account it will be seen by the WHC to have protected most of the site and that the ambassadors should accept the stadium proposals as the means to opening up and de-

veloping a long-neglected and abandoned location in a much-deprived neighbourhood of the city.

We very much appreciate the need for development and regeneration in this socially disadvantaged neighbourhood and also note the architectural value of the new stadium proposal. It now remains to be seen what the UK Government and UNESCO ambassadors will make of the proposals now that they are in the public domain. It is worth noting that 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."** This we feel is a significant statement and sends a signal to UNESCO that national government wouldn't hesitate to call in the planning application should that be deemed necessary to protect the OUV of the WHS as a whole. After all it is the UK Government that signed the agreement with UNESCO and it is their ultimate responsibility to manage the conditions of the inscription.

European Commission Requires an Environmental Impact Assessment on Vienna's Heumarkt Project

Christian Schuhböck,
Alliance For Nature

ALLIANCE FOR NATURE®



Fig. 1: Visualization of the Heumarkt Project. Design by Isay Weinfeld und Sebastian Murr.

Rendering: nightnurse images, Zürich.

The European Commission, in the framework of its recently released request to the Republic of Austria (contractual violation nr. 2019/2224), included reference to the High-Rise Project Am Heumarkt.

In this request the EU Commission advised that it recognised the interpretation of the Austrian Bundesverwaltungsgericht (BVwG - Federal Administrative Court) which ruled in a finding dated 9 April 2019 that concerning the project "Hotel InterContinental – WEV – Heumarkt Building" an Environmental Impact Assessment is required. "Alliance For Nature" sees this as a further important milestone in its activities concerning preservation of the World Cultural Heritage "Historic Center of Vienna".

Regarding the Heumarkt Project as such the Commission, referring to Article 4 of the "Guidelines concerning Environmental Impact Assessments of specific public and private projects", held that

[...] According (and relative) to the Guideline member states have a certain latitude in establishing the threshold value of a project. This latitude would however be limited under obligations reference Article 2 Paragraph 1 of the Guideline whereby projects on grounds of their type, size or location with resultant substantial consequences to the environment must be subject to an Environmental Impact Assessment. The threshold value rela-

tive to Article 4 Paragraph 2 subletter b of the Guideline should ease the requirement of a Member State in evaluating specific features of a project; it is not intended, however, to exempt entire classes of projects from the obligation of an Environmental Impact Assessment.

Consequent to Article 4 Paragraph 2 of the Guideline, when establishing a threshold value, the relevant selection criteria of Appendix III of the Guideline are to be observed. According to Paragraph Number 2 Letter c Number viii of the same Appendix, the ecological susceptibility of the geographic space which could possibly be harmed by the project must be considered. In doing so, particular attention is to be given to demands on nature in historic, cultural or archeologically significant districts and areas. This aspect of the Guideline was strengthened by Guideline 2014/52/EU modification. Guideline 2014/52/EU reinforced the EU engagement relative to protection and evaluation of cultural assets, including urban historic districts and cultural regions. In addition, the [2014/52/EU] Guideline stresses that the inclusion of optical features, specifically the modification of visual impressions from projects or changes to the visual manifestation or view of developed or natural landscapes and municipal territories, is essential to an Environmental Impact Assessment in order to better safeguard the historic and cultural heritage and the landscape.

In addition to this, the threshold values should aid in judging specific aspects of a project and not serve from the start to exclude entire classes of projects from the requirement of an environmental acceptability examination.

This however, according to the Commission, is the case in Austria. The threshold value for municipal construction – a space requirement of minimum 15 ha and a gross storey area of over 150,000m² – is set so high that in practice all potential projects within municipal zoning areas are exempted a priori from the requirement for an Environmental Impact Assessment and approval.

This observation is illustrated by the project for redesign of the Heumarkt parcel in the historic center of Vienna, considered as one of the most significant municipal development undertakings in Vienna since reconstruction following the Second World War. The project includes among others the construction of a hotel complex with restaurants, a cinema, a swimming pool, a library and a parking facility. The primary unit, a 68.2 m high tower building would be not only the tallest structure in Vienna's inner city but would as well stand within the sight axis between St. Stephan's Cathedral and Belvedere Palace, leading to a total modification of the city's visual perspective.

This argument led UNESCO to the conclusion that the project, proposed for Vienna's historic center, a designated UNESCO world heritage, constituted a serious threat to the Outstanding Universal Value of this site. This resulted in UNESCO in 2017 placing "the historic center of Vienna (Austria)" on its "List of world heritage in danger". Disregarding this, Austrian authorities issued a decree, the consequences of which ruled that an Environmental Impact Assessment according to Austrian regulations was not required for the Heumarkt project since the relevant legislation set a threshold value which the project would not exceed. This conclusion was voided and overruled by the Federal Administrative Court on grounds that Austria had not duly incorporated Article 4 Paragraph 2 in connection with Appendix II Number 10 Letter b of the Guideline into national legislation.

The Commission agreed with the interpretation of the Federal Administrative Court. When no Environmental Impact Assessment is required

for one of the most significant municipal construction undertakings within a UNESCO World Heritage zone because it does not exceed the threshold values set under Austrian law, then it is obvious that the threshold value has not been established in due consideration of the criteria according to Appendix III of the Guidelines, in particular the demands on nature in historically, culturally or archeologically significant landscapes and sites. It follows that the threshold values are incompatible with Article 2 Paragraph 1 of the Guideline.

The Commission consequently advocated the interpretation that Austria had exceeded its evaluation latitude under Article 4 Paragraph 2 of the Guideline in that it had set threshold values for urban construction undertakings incompatible with Article 2 Paragraph 1 of the relevant EU Guideline.

Earlier Background

At the application of petitioner WertInvest Hotelbetriebs GmbH the Vienna district government (as responsible authority) decided in a finding dated 16 October 2018 that for the project "Hotel InterContinental – WEV [Vienna Ice Skating Association] – Heumarkt Building" no Environmental Impact Assessment (UVP) need to be undertaken.

Against this ruling the Vienna-based and recognised environmental organisation "Alliance for Nature" (within its initiative "Rescue the UNESCO World Heritage `Historic Center



Fig. 2: The Belvedere vista at present (top) and with the projected Heumarkt complex (bottom).

Photo and Graphic: Initiative Stadtbildschutz Wien

of Vienna '1'), raised an objection to the Federal Administrative Court decision with the following wording:

The construction project "Hotel InterContinental, WEV and Heumarkt structure" lies not only within a Category D zone under Appendix 2 to the UVP-G 2000 as stated in the finding [of 16 October 2018], but also in a special protected area of Category A of Appendix 2 to the UVP-G 2000, since the construction project is proposed to be undertaken within the "Historic Center of Vienna" as included in a list of UNESCO World Heritage property according to Article 11 Paragraph 2 of the "Agreement concerning protection of World Cultural and Natural Heritages" ([Austrian] Federal Legal Register / BGBl Nr. 60/1993 and Nr. 94/2008). Accordingly, for the determination of a requirement for an Environmental Impact Assessment [UVP] not only projects listed in Appendix 1 to UVP-G 2000 (Z 9 lit. h, Z 17 lit. b, Z 18 lit. b, Z 20 lit. a and Z 21 lit. b) come under consideration, but also those which apply for projects in Category A areas (specially protected areas) (for example Z 9 lit. g, Z 20 lit. b).

The objection by "Alliance For Nature" was the reason why the Federal Administrative Court (BVwG), acting under the Austrian Environmental Impact Assessment (UVP) legislation and the European Environmental Impact Assessment directive, came to the following conclusion:

The project would, on grounds of its volume and structural height, cause a fundamental disturbance of the historic skyline, which had been considered by UNESCO as fundamental for its Outstanding Universal Value, whereby this [project] also leads to a significant negative impact on the authenticity and integrity of the world heritage site, thus contradicting the criteria for the designation as such. It is therefore to be expected that under consideration of the scope and sustained environmental effect, the protective designation of the area as "UNESCO World Heritage Site Historic Center of Vienna" would be substantially impaired. According to § 3 Paragraph 4 of the UVP-G 2000 including Paragraph 7 of this designation and Appendix 1 Z 18 lit. b UVP-G 2000 together with Footnote 3a and under immediate application of Article 1 Paragraph 1 and Article 4 Paragraphs 2 and 3 additional to Appendix II Z 10 lit. b and Appendix III of the UVP general directions 2011/92/EU and 2014/14/52/EU, an Environmental Impact Assessment for the project "Hotel InterContinental", "WEV" [Eislaufverein] and "Heumarkt Building" is to be undertaken.

Further important milestones

"Alliance for Nature" is pleased that the EU Commission supports the position of the Austrian Federal Administrative

Court. This is a further important milestone in our efforts to preserve the "Historic Center of Vienna" under the UNESCO World Heritage Convention. Nevertheless it remains to be seen how the Verwaltungsgerichtshof (VwGH - Supreme Administrative Court), the next higher instance, will decide in this case since the investor company has filed an objection to the ruling of the BVwG. Irregardless, the Heumarkt case is expected to initiate a revision of the relevant Environmental Impact Assessment Law and related legislation to the effect that future projects of a Heumarkt nature will not be possible in Austria's world heritage sites.

Appeal to the UNESCO

There is a possibility that the disputed high-rise project "Am Heumarkt" may not pass the Environmental Impact Assessment under Austrian law. Against the background of the Heumarkt case, the "Alliance For Nature" environmental organization appeals to the UNESCO World Heritage Center and the UNESCO World Heritage Committee, not to delete the "Historic Center of Vienna" from its UNESCO World Heritage List, however to retain it on its Red List of World Heritage Sites in Danger.

Public land sold for a high rise project

Herbert Rasinger, Initiative Stadtbildschutz

The city council of Vienna continues to take further steps that will result in Vienna's loss of the World Heritage status. On 19 December 2019 the city council sold 82 m² of public land adjacent to the planned Heumarkt Neu highrise building project to the investor Mr. Tojner for a price of 516.600 Euro. This is in direct conflict with the management plan, which the city confirmed to UNESCO WHC in 2006. This plan does not allow new high rise buildings in world heritage zones.



Fig. 3: The public land sold (green rectangle) is situated between the concert hall and the 38 m high hotel. It is presently a pavement for pedestrians.

Photo: Kupf

The Future of Heritage in a World Heritage City: A Critical Analysis of Controversial Cases in Istanbul

Asli Zeren, Centre d'Études Turques, Ottomanes, Balkaniques et Centrasiatiques,
École des hautes études en sciences sociales, Paris¹

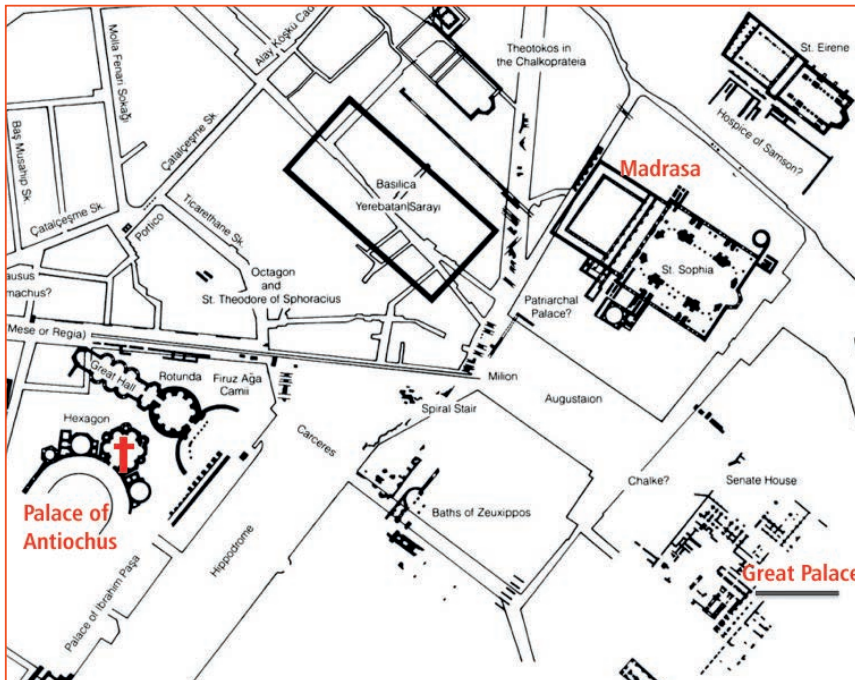


Fig. 1: Three controversial projects (marked red) and their location in Istanbul. The red cross refers to the remains of the Church of St. Euphemia

Map: After Bardill, J. 1997. 'The Palace of Lausus and nearby monuments in Constantinople: a topographical study', *AJA* 101: 67–95.

Restoration of the Church of St. Euphemia and its surroundings

The Church of St. Euphemia by the Hippodrome in Constantinople was originally erected in the early 5th century as the Palace of Antiochus and its audience hall was converted into a martyrium in the early 6th century². The church was in use during the late Byzantine period and the relics at least partly remained in this church until the end of the Byzantine Empire. In the late 15th and early 16th centuries, the church was partly demolished during the large palace constructions started within the area. Small houses and a prison were constructed in the area during the 19th and the early 20th century. When the prison building was demolished in 1939 due to danger of collapse, the *martyrium* structure and the frescoes were discovered.

The archaeological excavations in the field were carried out together by Turkish and German teams between 1942 and 1964 (see Fig. 2 and 3). After the discovery of the fresco cycle of St. Euphemia, the west niche of the hexagonal hall was covered with a small shed to protect the paintings. Although in the Conservation Master Plan and Site Management Plan, Hagia Euphemia and Its Surroundings were registered as a historic site in 1983 and were identified as 'archaeological park and exhibition area'³, the historic site has been ignored by the authorities for several years. In 2013, a conservation and renovation project started with the sponsorship of the Vehbi Koc Foundation both for the architectural remains and the frescoes⁴. The restoration of the frescoes and the architectural remains has been completed, with a modern protection roof over the remaining wall to be opened soon as a part of the Turkish and Islamic Arts Museum.

¹ Based on the author's Ph.D. research project at Politecnico di Milano (2015) – A critical analysis of the management of Historic Areas of Istanbul through three controversial heritage cases in Sultanahmet Archaeological Park based on the principles of the Historic Urban Landscape Approach.

² Naumann and Belting, *Die Euphemia-Kirche* (Berlin 1966): 20–21.

³ Istanbul Historic Peninsula Site Management Plan (Istanbul October 2011): 316, 317, 319, 327. Istanbul's Historic Peninsula Conservation Master Plan Report (2005) Archives of Istanbul No.4 Regional Board Directorate for Protection of Cultural Heritage

⁴ Akyürek, E. 2017. "Azize Euphemia Kilisesi Ve Akibeti." *Toplumsal Tarih* 284: 12–15.



Fig. 2: Ruins of St. Euphemia Church.

Photo: Istanbul Deutsches Archäologisches Institut, Photographical Archive, 35 Naumann 5479

The Master Plan of Istanbul by Prost in 1937, the Supreme Council of Antiquities and Monuments of Turkey 1953 declaration of the Sultanahmet zone as "Archaeological Park" and the 1995 proclamation of the Historical Peninsula as a Historic Site by the Cultural and Natural Heritage Conservation Board all note the creation of the Archaeological Park. However, the Archaeological Park Project in Sultanahmet World Heritage Site has still not been implemented. Today an important part of the ruins of Lausus Palace, dating to the early Byzantine period, lies buried to the northeast of the remains of St. Euphemia Church under the illegal stage structure with seats built by the Fatih Municipality in 2009 without the knowledge and permission of the relevant conservation board.

The Istanbul No.4 Regional Board Directorate for Protection of Cultural Heritage demanded the removal of these structures immediately in order to protect the integrity of the historic site with decisions dated 2009, 2010, 2013, 2014, 2016, 2017, and finally in 2018 (23.05.2018/6257). So far Fatih Municipality has not taken a step to fulfill the requirements of these decisions, and these structures, which are not compatible with the historic fabric of the site, are still standing in the centre of the Sultanahmet Archaeological Park. Following the final decision of the Istanbul No.4 Regional Conservation Board, the Association of Archaeologists in Istanbul started a petition for the removal of these structures⁵. To protect the integrity and authenticity of the entire site, the remains of the Church of St. Euphemia should be protected together with the ruins of the Palace of Antiochus, and the ruins of the Palace of Lausus together with the Ottoman period ruins.

⁵ The Petition by The Association of Archaeologists in Istanbul for the removal of the concert stage and seats on the remains of the Lausus Palace (in Turkish) <https://www.arkeologlardenegist.org/aciklama.php?id=33>

The reconstruction of the Hagia Sophia (Fatih) Madrasa

As stated in an ICOMOS Turkey Report⁶, the architectural features of the madrasa in the 15th century are uncertain for there is no information in the historical sources about the architecture of the building which was demolished by Mayor Server Pasa in 1869. The madrasa, which was reconstructed in the last quarter of the 19th century, served as an orphanage after 1924, was demolished in 1936 due to severe dilapidation and to reorganise the surroundings of Hagia Sophia.

As the museum building could no longer provide sufficient space for its administrative requirements, the museum directorate proposed to reconstruct the madrasa building, discovered in the excavation in 1985⁷, by initiating further excavations in 2008 to explore the foundations. After the highly critical reaction of ICOMOS Turkey, the Chamber of Architects, and the joint mission of UNESCO and ICOMOS reports, the Istanbul No. 4 Regional Con-



Fig. 3: The Hagia Sophia Madrasa, 1936.

Photo: The Encümen Archive of the Istanbul Archaeological Museums, The Archives of the Istanbul No.4 Regional Conservation Board

servation Board requested the opinion of the Hagia Sophia Scientific Committee⁸ to provide scientific and technical guidance by national and international specialists. Upon the approval of the reconstruction project of the madrasa, the ICOMOS Turkey Committee responded with an open

⁶ Briefing on the Hagia Sophia Museum by the Executive Committee of ICOMOS Turkey http://www.icomos.org.tr/Dosyalar/ICOMOSTR_pdf and the Annex: A Brief Historical Research for Hagia Sophia (Fatih) Madrasa http://www.icomos.org.tr/Dosyalar/ICOMOSTR_pdf See Figure 3 and 4.

⁷ The Foundation Excavations in 1985 and 2008, the archives of Istanbul No.4 Regional Board Directorate for Protection of Cultural Heritage.

⁸ The Hagia Sophia Scientific Committee was established in 1993 by the decision of the Ministry of Culture and Tourism and abolished in September 2012. The Committee was reestablished in February 2014 and continues to provide scientific guidance.



Fig. 4: The site of the Hagia Sophia Madrasa, 1937.

Photo: The Open Archive at SALT, The Ali Saim Ülgen Archive

letter harshly criticising the Conservation Board and its members. The Committee stated that approving the reconstruction of the two-storey madrasa as a “fake historic monument” next to a 1,500-year-old historic monument shows a lack of knowledge of the board members on World Heritage legislation.

Following the letter of ICOMOS Turkey dated 01.01.2014, on 17.04.2014 UNESCO WHC sent a letter to the Site Management Directorate expressing their concern about the reconstruction project of Hagia Sophia Madrasa and its potential irreversible negative impacts on the OUV of the WH property. Then Istanbul Site Management Directorate sent an official letter to the Ministry of Culture and Tourism about the requirement of conducting a Heritage Impact Assessment based on the World Heritage Convention and the ICOMOS Guidelines of Cultural Heritage Impact Assessment (28.05.2014/2014-50). In the 2015 Conservation report by the State Party, it is noted that “A HIA is being prepared for the proposed reconstruction of the Hagia Sophia Madrasa, in response to concerns raised by the World Heritage Centre in 2014” (p.96).

The 2018 Conservation report by the State Party states: “The HIA Report for the Hagia Sophia Madrasa was sent by the Ministry of Culture and Tourism to the Ministry of Foreign Affairs on November 21, 2017 to be forwarded to the UNESCO WHC. As a result of this impact assessment study with the approval of the Minister as of 11.12.2017 and in line with the projects approved by the Conservation Board, under the supervision of Istanbul Survey and Monuments Directorate, Istanbul Restoration and Conservation Central Laboratory Directorate, Hagia Sophia Museum Directorate and Hagia Sophia Scientific Committee the reconstruction project implementation have started”. It should be noted that there are 20 days in total in between these two important dates.

In addition to this rush to start the project, Prof. Zeynep Ahunbay, a member of the Chamber of Architects, ICOMOS Turkey, Europa Nostra and the Scientific Board of Hagia So-

phia, points out to important details about the HIA Report in one of her interviews, noting that they do not know the authorship of the Report⁹. She then expresses her disappointment on behalf of the ICOMOS Turkey Committee who wrote a letter to UNESCO WHC stating the negative impacts of the madrasa reconstruction project and requesting help. Yet there has been no response by the WHC which led to the immediate implementation of the project. As was repeatedly expressed by the ICOMOS Turkey Committee, the reconstruction of a late 19th c. two-storey building adjacent to a unique 1500-year-old World Heritage Monument would irreversibly damage the OUV of one of the most well-known historic monuments in the world of architecture history, putting the World Heritage Status at risk.

The Four Seasons Hotel extensions over the remains of the Great Palace of Constantinople

The Great Palace of Constantinople, dating back to the 4th and 5th c. AD, is situated on a wide area in the south-eastern end of the Historic Peninsula. Today the archaeological remains of the palace mostly lie beneath the Sultanahmet Mosque and the surrounding buildings. In 1912 and 1933, large fires burned down all the buildings in the adjacent district to the south of the mosque. The first prison in the capital of the Ottoman Empire, built in 1918-1919, later abandoned, was assigned to the Sultanahmet Tourism Company, rented on a build-operate-transfer model for 49 years in 1992, and opened as the Four Seasons Hotel in 1996 after restoration. This was part of the Sultanahmet Square Tourism Centre which was declared by the Council of Ministers in 1982 based on the “Tourism Encouragement Law” (N. 2634) that came into effect on March 16, 1982.

With the agreement of the state authorities, the archaeological park was to be sponsored by the Sultanahmet Tourism Company in consultation with a scientific board, together with the construction of the hotel extensions. In 1997, archaeological excavations started under the direction of Istanbul Archaeological Museums in order to uncover the remains of the Great Palace. When the tourism company requested to increase the bed capacity of the hotel and construct additional buildings as approved by the Ministry on 22.04.2005, the Istanbul Chamber of Architects filed lawsuits against the Ministry for allowing the new constructions within a “non-construction zone”. In 2008, the construction work and the archaeological excavation had stopped in the field, and in 2009, the Administrative Court

⁹ Mert Inan, “No Response to the Letter Concerning The Hagia Sophia,” Milliyet Newspaper, August 28, 2019, <https://www.milliyet.com.tr/gundem/ayasofya-mektubuna-yanit-yok> (accessed January 10, 2020). The same criticism has been expressed by the Association of Archaeologists in Istanbul on their letter to the Istanbul Site Management Directorate dated 23.01.2018.

cancelled the permission both for the archaeological research and the construction work (see Fig. 5).



Fig. 5: The Archaeological Excavation Field of the Great Palace of Constantinople, 2015. Photo: A. Zeren

In December 2011, the experts of the Istanbul Archaeological Museums reported both to the museum and the Fatih Municipality that the walls of the Byzantine Palace were damaged and demolished during the construction of the hotel extensions (see Fig. 6). Nevertheless, the construction work continued and the tourism company built a five-story hotel building on the archaeological site. After a newspaper published the news about the ongoing destruction, a public statement was made expressing concern over the destruction and violation of conservation laws.

The damage which was reported by museum experts on December 15, 2011 reached the conservation board on January 18, 2012, and Fatih Municipality was criticised for not



Fig. 6: The Extensions of the Four Seasons Hotel, Sultanahmet, 2017. Photo: P. Aykaç

taking immediate action. As the state of conservation and mission reports since 2009 demonstrate, the World Heritage Committee repeatedly expressed their concern about the protection and integrity of the remains of Great Palace. The then Minister Gunay stated in his press conference dated 09.02.2012 that the demolition of the extensions had already started by the Fatih Municipality yet this has not been implemented. The Historic Areas of Istanbul were inscribed on the UNESCO World Heritage List in 1985 for 'reflecting the important phases of the historical background of the World Heritage City'.

The Site Management Plan of the Historic Areas of Istanbul and the 2014–2023 Plan of the Istanbul Development Agency claim that their management strategies are based on the principles of the Historic Urban Landscape approach, meaning that all layers of historical and cultural significance should be addressed to present the OUV of the historic site. The revised Site Management Plan for the Historic Areas of Istanbul repeatedly refers to the Roman, Byzantine and Ottoman period of the historic city for the significance and OUV of the site. This clearly demonstrates the strong need for consistency between the proposed and implemented management approach and projects. The remains of the Great Palace of Constantinople which still lies buried under the extensions of the Four Seasons Hotel and its surroundings, was the principle royal residence of the Byzantine emperors which would enlighten us about the Byzantine history and architecture. Thus, ceasing the archaeological excavations and scientific research for several years on such an important historic site is a violation of the right to science as well.¹⁰

¹⁰ International Covenant on Economic, Social and Cultural Rights, 16 December 1966.

Article 15(2): The steps to be taken by the States Parties to the present Covenant to achieve the full realization of this right shall include those necessary for the conservation, the development and the diffusion of science and culture.

Article 15(4): The States Parties to the present Covenant recognize the benefits to be derived from the encouragement and development of international contacts and co-operation in the scientific and cultural fields.

Looting and Selling of Stones From the City Walls and Historic Buildings of Diyarbakir

Anonymous¹

According to news published in the newspapers on the 13th of December, 2019, stones were removed from the World Heritage Diyarbakir Castle and sold in some cafes for interior decoration. In my research by comparing old photos and the place that was said to be dismantled, the following conclusions can be made.



Fig. 1: Mardin Gate Walls, 20 February 2002



Fig. 2: Mardin Gate Walls, 27 December 2019



Fig. 3: Mardin Gate Walls, 18 August 2009



Fig. 4: Mardin Gate Walls, 27 December 2019

The city walls were found to be fallen down from place to place in the Mardin Gate section between the bastions 47-48 and between the bastions 48-49 on the city walls up to

the height where a human hand can reach, as mentioned in the newspaper. However, when compared with the photographs from 2001, 2007 and 2009, it was seen that the same fallings were at the same points in this section of the city walls and that the removal of stones was not the case yet as stated in the newspaper. However, since there was no protection, conservation or restoration work in this part of the city walls, it was found that a small number of stones (10-20 in total) had fallen from the cavities formed as a result of stone fallings since the beginning of the 2000s. (Fig. 1-4)

¹ The author of the text and photos is a local from Diyarbakir who is known to World Heritage Watch.



Fig. 5: The city of Diyarbakir. The area of the Mardin Gate is marked in red.

However, due to the clashes in Diyarbakir / Sur between October 2015 and March 2016 and subsequent demolition and excavation works carried out by the Ministry of Environment and Urbanization, Sur was transformed into a flat land and was severely damaged. During the demolition process, basalt stones (including processed surface stones, columns, column capitals, arch fragments, decorated stones) belonging to the structures that need to be preserved for their historical and environmental value were looted, some of which were used in restored buildings in the destroyed area while most of them were used outside the conflict area. They were used as a decorative material in other quarters of Sur and other quarters of Diyarbakir, or as a building material, which led to the formation of a market for basalt building materials from historical monuments. In the past, there were reports in the media about this issue, which caused the complaint of citizens, but no measures were taken by the authorities.

Despite the fact that today there is no conflict both in the previous conflict area and in the other two quarters of Sur (Alipasha and Lalebey neighborhoods) where urban transformation has been implemented, basalt stones material belonging to the ruined buildings registered as of environmental value have been used in new buildings and they all have been depleted. As a result, in order to respond to the demand, it was found out that those who traded this

business removed the stones from registered monumental buildings or houses in the ruins which were not used in Sur district. Finally, it was seen that stones were removed from the registered Surp Sarkis Armenian Church.

Surp Sarkis Armenian Church was built in the 16th century and repaired last in the 19th century. After 1915, it was used as a granary and paddy factory for many years. Not being in use for a long time, its top cover recently collapsed. However, there was a family living in the courtyard of the church and they were protecting it from destruction. The church is located in the neighbourhood of Alipasha, which was demolished for urban transformation. For this reason, the family living in the courtyard of the monastery was removed, and after that, the church was more exposed to the destruction by treasure hunters, and demolitions for the sale of stones.

Hearing about the renewed destruction, the manager of the church foundation organized a program on November 20, 2019 in Medyascope TV internet news channel, in which he clarifies the situation (<https://medyascope.tv/2019/11/20/diyarbakirdaki-500-yillik-surp-sarkis-kilisesi-yok-olmanin-esiginde/>). He visited the church again on December 18, 2019 to determine the extent of the destruction. The woman's



Fig. 6: Ruins of the Surp Sarkis Church, 18 December 2019



Fig. 7: Destroyed part of the Surp Sarkis Church with Western entrance, 18 December 2019

pavilion above the western entrance of the church was demolished in order to take stones but because a stone fell on the head of one of the demolishers, the person got injured seriously, which could be understood from the blood on the stones. It was said that the injured was taken to the hospital (Fig. 6–8).



Fig. 8: Wall of Surp Sarkis Church with traces of spilled blood, 18 December 2019

It is the responsibility of the Ministry of Culture, Regional Directorate of Foundations, Provincial Governorate and Municipality to protect the empty and dilapidated structures such as the Surp Sarkis Armenian Church, which is the property of the Armenian Foundation of Surp Giragos. The city is unfortunately destroyed due to the increasing demand for processed basalt stones and the destruction is increasing day by day. Unless a precaution is taken, unused and ruined historical buildings in both the church and the city will continue to be demolished for stone removal.

Photographs of a restaurant which was built using properly processed basalt stones from historical buildings are shown below (Fig. 9–11). Without taking permission from the Protection Institute, this restaurant in Suriçi was built just outside the blockade districts where conflicts had been taking place and in a location which is still forbidden to enter but where it can easily be seen by the responsible institutions (according to the law enacted for Sur district, the authority of the municipality was transferred to the Ministry of Environment and Urbanization).



Fig. 9–11: A restaurant in Suriçi built with basalt stones taken from the city walls, 18 December 2019

The recent conflict in the city walls and the demolition of large parts of Sur, including registered heritage buildings in the area, the subsequent transformation of the building blocks into commercial materials, and the failure to prevent this by the relevant institutions have created a risk of the destruction of other registered buildings in the city walls and even the destruction of the Diyarbakir Citadel.

Considerations for the Reconstruction of the Old Town of Aleppo

Mamoun Fansa, Friends of the Old Town of Aleppo



In 1986 the old town of Aleppo was raised to the status of a World Heritage Site by UNESCO. In 2006 Aleppo had been the cultural capital of the Islamic world. The old town of Aleppo gained its importance not only because of its monuments and its continuity of settlement, but it was also a unique community, which, thanks to its liveliness, its complex web of utilizations and its ethnic diversity, was saved from being a mere tourist destination. What was special about the old town was its liveliness and its strength as a source of identity.

The 362 hectare old town with its 110,000 inhabitants, 30,000 jobs and 16,000 residential units was almost completely destroyed in the war. Since 2014, "Friends of the Old Town of Aleppo" have been promoting an orderly and systematic reconstruction. For this purpose, we develop concepts and considerations, which is very difficult due to the distance and the unclear political situation in Syria. The extent to which a complete reconstruction is possible remains to be seen. This endeavour means enormous efforts in different areas of work such as UNESCO regulations, monument preservation, construction technology, monument and

building law. It is also important to restore the neighborhood of people, which requires time and extensive financial resources.

Prerequisites for urban reconstruction

The damage to the buildings in the eastern part of the city, especially in the old town, is devastating. According to UNESCO, around 70% of the historic buildings on the monument list are badly damaged and partly razed to the ground, numerous hans, mosques, the traditional Aleppo houses and other buildings as well as 60% of the bazaars are partly, heavily or completely destroyed.

Changes in the cityscape must not impair the Outstanding Universal Value of the world heritage as determined by the UNESCO. Monuments must be restored commensurate with the World Heritage status. Failure to comply with the criteria may lead to the deletion from the World Heritage List. All reconstruction measures must therefore be approved by, and coordinated with, UNESCO.

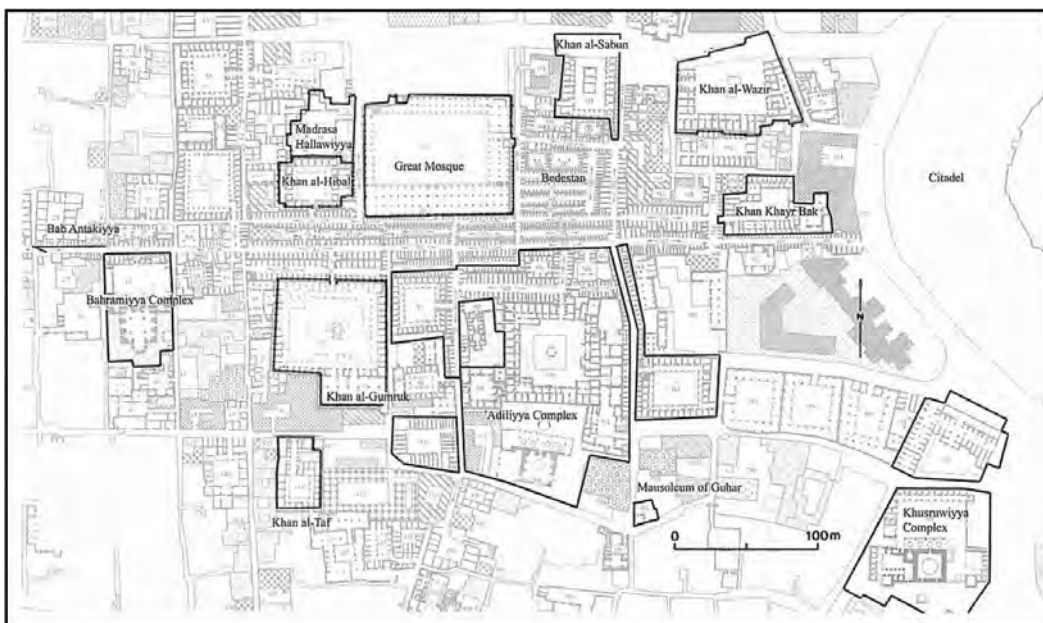


Fig. 1: The Great Waqfs of the Medina as an example of available quality mapping of the Old Town of Aleppo.

Map based on Gaube and Wirth, Aleppo, City Map, digitized by Michal Osman

After the end of the fighting and the recording of the damage, the question arises: What should be rebuilt in order to maintain the character of the old town and comply with UNESCO regulations?

The following considerations and suggestions should be taken as a basis:

- As far as possible, the entire historical city plan with the city wall and gates as well as the streets with the narrow alleys should be preserved or rebuilt. This process should be guided by UNESCO.
- In order to preserve the old historical structures of the streets, it is advisable to maintain or rebuild the corner houses which have historical value.
- Historical buildings such as mosques and other religious buildings, hans, schools, residential houses and the entire bazaar must have priority. Aleppo's monument list is to be used here for taking decisions.
- Authentic material and handicraft techniques should be used.
- In a first step - before any construction planning - urban design guidelines for the old town should be adopted in which binding criteria for all essential parameters of new buildings and public infrastructure such as maximum height and volume, proportions, facades, roofs, window openings, building materials, etc. will be decreed.

Need for action

In their transition phase, post-war cities, despite their differences, have recurring, comparable structural problems that are likely to arise in Aleppo during the reconstruction, too. Concepts, strategies and measures have to be developed in order to be able to act deliberately in the chaotic circumstances after the end of the war. One of the most important concerns in the reconstruction process is an overview of the measures necessary to ensure that the World Heritage status is maintained. Syria must present a concept in which the future of the world cultural heritage must come first.

Cooperation with UNESCO is very important for the reconstruction at this stage in order to avoid further damage. Wrong decisions in post-war reconstruction can be as devastating as destruction in war itself. According to my last secured information from the Directorate General of the Antiquities Administration in Damascus, there is no overall concept for the reconstruction of the old town. Those responsible in Aleppo also work without a coordinated work plan. Decisions are made that cannot be reconciled with World Heritage status.

In the past two years, some areas of the bazaar have been restored with the help of private sponsors and international

organizations such as the Aga Khan Foundation. This work was not based on an overall plan, instead restoration work was carried out depending on finances and relationships with the regime. Unfortunately, work was not implemented according to factual, scientific criteria and UNESCO regulations. This changed the overall appearance and character of the monument area.



Fig. 2: Ongoing reconstruction of the Umayyad Mosque. Photo: Berlin Museum of Islamic Art

Immediately after the war in Aleppo, Russia decided that the Umayyad Mosque should be reconstructed with financial support from the Chechen Republic. 2 million dollars were made available for this. It later became clear that the money would not be sufficient, so the construction site was shut down several times.

A working group from Aleppo led by a professor of architecture at Aleppo University has started restoring and reconstructing the heavily destroyed mosque. There is no overall concept here either. Various experts in Aleppo have determined that the work was not carried out according to best practice due to a lack of suitable material and technically competent craftsmen.



Fig. 3: A reconstructed part of the Umayyad Mosque. Photo: Berlin Museum of Islamic Art

I call upon UNESCO Headquarters in Paris to alert the responsible politicians in Damascus that changes that are not compatible with UNESCO regulations may lead to the status of the world cultural heritage being revoked. The new situation requires quick, but careful, action in order not to face a *fait accompli*.

Our association has founded five working groups to accompany a successful reconstruction process.

Working Group 1: Law

Syrian and international civil law as well as the various building and monument laws and decrees must be checked for their effects on the post-war situation and rewritten if necessary. Due to the massive destruction of the city of Aleppo, a space outside the law will probably exist. As with other listed or World Heritage sites in war zones such as Beirut or Afghanistan, Syrian heritage law is unlikely to apply in every case. Already during the war, parcels of fled owners have been sold to investors - some of them foreign - who will not take into account the original scheme of small plots. There is therefore a risk of merging plots for the construction of large buildings. Whether UNESCO's List of World Heritage in Danger can be used for potential sanctions is open to question, and experience has shown that it is not politically effective. The role and influence of UNESCO should be clearly defined in this respect.



Fig. 4: A tract of the bazaar before the war. Photo: Berlin Museum of Islamic Art



Fig. 5: About 70% of the bazaars were destroyed. Photo: Berlin Museum of Islamic Art

Working group 2: Archeology

To date, no systematic excavations have been carried out in the old town of Aleppo. For this reason, the older eras of the settlement should be archaeologically researched in the first phase of reconstruction. On the basis of an extensive archaeological and historical study, it can then be decided where archaeological excavations and further investigations should take place. Questions would be formulated and goals defined, excavation areas determined and corresponding excavations carried out. Archeology must be firmly anchored in the overall reconstruction process. Necessary archaeological measures should be given priority in order to use important historical sources for the reconstruction of history.

Working group 3: Damage mapping, the role of the Aleppo archives in exile

The Aleppo archive was created in the Aleppo Documentation Center from 2008 to 2011. In its institutional development phase, it was able to collect approx. 3,000 digital data from administrations (on infrastructures, planning), ministries, research works and projects, as well as from cooperation projects. The cadastral plans also served as a basis, with the most detailed information taken from the plans of the French mandate period. The data were added to the database, supplemented by data from the land registry, family archives and religious foundations (Waqaf).

The extent to which access to this data is legally possible must be clarified. All available database information, such as the map commissioned by the Berlin Islamic Museum, the German Archaeological Institute and the map of current war damages commissioned by UNESCO, should be

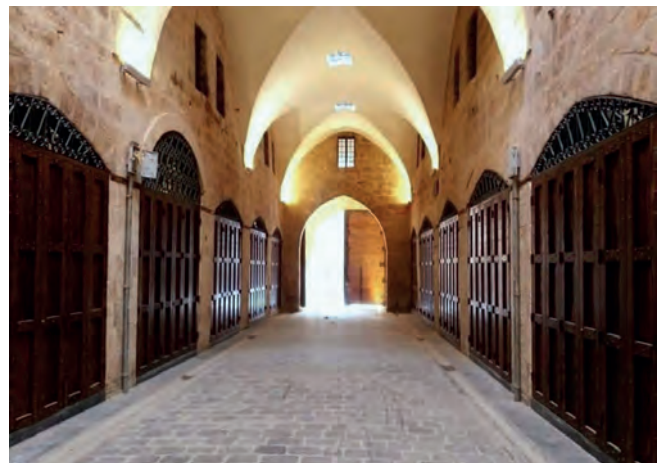


Fig. 6: A stretch of about 200m of the bazaar have been reconstructed with support from the Aga Khan Foundation. Photo: Abo Saeed Lolo

checked for their possible utilization. The aim of using numerous databases from different institutions is to create a detailed overall map with all information about the war damage.

Working group 4: Urban planning

In order to develop reconstruction plans, the situation before the war should be examined and some important results from the past decades should be compiled: Before the 1990s, inconsistent urbanization processes prevailed. There was no traffic-oriented planning through the old town. The renovation project supported by GIZ from 1994 to 2011 improved the living conditions of the old town residents. The old town was revalued and tourism developed (e.g. through restaurants and hotels). Unfortunately, due to the lack of detailed information on the state after the war, no concrete plans can be drawn up for the reconstruction strategy. It has been shown time and again that there is no success without local cooperation. Local realities will provide us with many more ideas and arguments.

Working group 5: Conflict-sensitive strategies - post-conflict analysis and planning

All problems specific to reconstruction should be discussed in this working group, and potential solutions should be sought. The working group forms a link between all groups, particularly in the participatory planning and implementa-

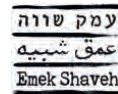
tion of the concept for urban development in post-conflict situations. The working group should mediate between the actors of the different fields of work as well as the old and new population of the old town, and achieve a social consensus. The group will also mediate between the residents of the old town and defuse conflicts.

In this context, the changed demographics that the city of Aleppo, especially the old town, experienced after the war plays an important role for the reconstruction of the old town. A reconstruction of the old town with the former residents would be much easier to be carried out than with new residents who have no ties to the cultural heritage. We can build on the cultural awareness, identity and connection of the residents with their old town as a cultural unit.

References

- Fansa, M. 2000: Damaskus – Aleppo. 5000 Jahre Stadtentwicklung in Syrien. Mainz 2000.
- Fansa, M. 2013: Aleppo. Ein Krieg zerstört Weltkulturerbe. Vergangenheit, Gegenwart, Perspektiven. Mainz 2013.
- Fansa, M. 2014: Syrien. Sechs Weltkulturerbe-Stätten in den Wirren des Bürgerkriegs. Mainz 2014.
- Fansa, M. Wimmer, S. Simon 2017: Strategies to Rebuild Aleppo. Mainz 2016.
- Fansa, M. 2018: Aleppo literarisch. Gedichte. Geschichten. Sprüche. Mainz 2018.
- Gangler, A. 1991: Ein traditionelles Wohnviertel im Nordosten der Altstadt von Aleppo. 1991.
- Gaube, H., Wirth, E. 1984: Aleppo: Historische und geographische Beiträge zur baulichen Gestaltung, zur sozialen Organisation und zur wirtschaftlichen Dynamik einer vorderasiatischen Fernhandelsmetropole. Beihefte zum TAVO, B. 58, 1984.

Cable Car Plan Threatens Unique Character and Heritage of the Old City of Jerusalem



Talya Ezrahi and Yonathan Mizrahi, Emek Shaveh

This paper is written from the point of view of Emek Shaveh, an Israeli NGO which promotes an inclusive approach to Jerusalem's ancient sites and views the city's composite historical sites as the shared heritage of members of multiple peoples, religions and cultures. We would like to warn against an immediate threat of severe loss of historical authenticity to the World Heritage Site of the Old City of Jerusalem and its Walls due to a plan to build a cable car that will damage the character of the ancient city and its skyline.

Background

Historic Jerusalem is a city holy to the three monotheistic religions: Judaism, Christianity and Islam, and a major destination for tourists and pilgrims from all over the world. Its archaeological remains span over 5000 years including evidence of a fortified city from the second millennium BCE, a Judean city from the first millennium BCE, remains of the Roman city, churches of rare historical value, and unique Islamic structures attesting to Muslim presence in the city for over a millennium. Israel and the Palestinians each claim Jerusalem's historic core as the heart of the capital of their respective states (in the case of the Palestinians, the capital of a future state).

Jerusalem's Old City and its Walls was added to UNESCO's list of World Heritage Sites in 1981 (under criteria ii, iii and vi)¹. The story of UNESCO and Jerusalem is unique and reflects the complex status of the city. It was nominated by Jordan when the latter was no longer governing the city. Israel had conquered East Jerusalem, the West Bank and Gaza in 1967 and shortly after the war annexed East Jerusalem including the Old City. In 1982 the site was inscribed to the list of World Heritage Sites in Danger² due to archaeological and development works which were judged to constitute a danger of significant loss of historical authenticity and cultural significance. In 1999 Israel ratified the World Heritage Convention.³

Over the years, Israel and UNESCO have periodically clashed over Jerusalem. At the basis of the disagreements is the fact that while Israel considers itself to be the legitimate sovereign over East Jerusalem, the international community per-

ceives it as occupied territory and applies to it the International Humanitarian Laws⁴ and International Human Rights Laws⁵ pertaining to cultural heritage in occupied territory. UNESCO has reiterated the view that Israel must cease from unnecessary excavations and development works which it perceives to be in violation of conventions, resolutions and decisions regarding cultural heritage in occupied territory.⁶

In 2003, UNESCO's General Conference adopted a resolution to create an Action Plan for the Safeguarding of the Cultural Heritage of Jerusalem.⁷ Formulated by a committee of twelve renowned experts in consultation with the relevant state parties, the plan, completed in 2007, outlined a comprehensive conservation plan for the historic city.

Following the preparation of the plan, in 2010, the World Heritage Committee decided to send a Reactive Monitoring Mission consisting of staff from the World Heritage Centre, ICCROM and ICOMOS to "assess and advise on progress made in the implementation of the Action Plan".⁸ Due to political disagreements between Israel and the Palestinians, the mission was never allowed to arrive in Jerusalem. Also, Israel had not agreed to implement a request by UNESCO's Director General to appoint a permanent representative from the organization to East Jerusalem.

Tensions between Israel and UNESCO reached a crisis point in 2016 when both the World Heritage committee (in its 40th session)⁹ and the Executive Board (in its 200th session¹⁰) passed resolutions which omitted or downplayed the Jewish connection to Jerusalem and the Temple Mount. Despite efforts by the Director General to soften subsequent resolutions on Jerusalem, in October 2017 Israel announced it was leaving UNESCO¹¹ shortly after the United States announced it was leaving, citing anti-Israel bias. Israel officially left the organization in January 2019.

The Politics of Archaeology and Tourism in Jerusalem's Historic Basin

Jerusalem's Historic Basin is the most highly excavated city in the world relative to its size¹² The Historic Basin includes

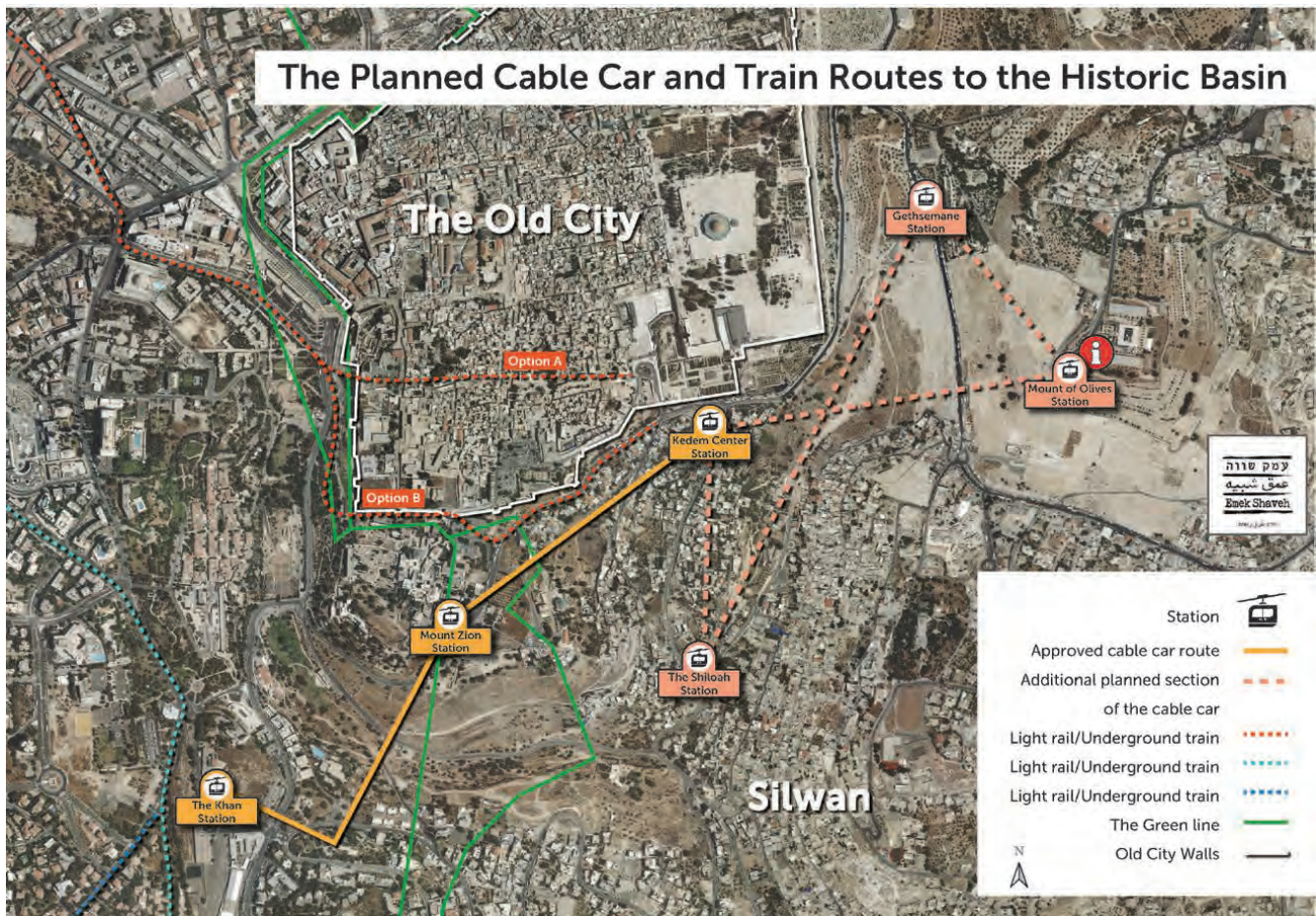


Fig. 1: The route of the planned cable car.

Map: Emek Shaveh

the WHS of the Old City and its Walls and a surrounding belt which contains the important City of David archaeological mound, the Ben Hinnom Valley and other ancient and sacred sites to the east and north of the Old City. Excavations in the city began in the mid 19th century by European delegations whose mission was at once scientific and at the same time a spiritual endeavor to uncover concrete evidence for the setting of the biblical narratives.¹³ In the mid nineteen-nineties archaeology as a means to concretize scripture was reintroduced as part of a religious nationalist agenda to entrench Jewish control in East Jerusalem. The trend, initially led by ideological groups, has been subsumed into official government plans for excavation, conservation and tourism development in the Historic Basin.¹⁴ Visitors to sites such as the “City of David” mound of ancient Jerusalem (just outside the declared WHS) are treated to an experience which seamlessly weaves together archaeological finds with biblical stories.

Over the past two decades, an increasingly political agenda has converged with economic interests, fast consolidating tourist routes which prioritize narratives that strengthen Israel’s claims to the right to exclusive sovereignty over the Historic Basin. The pace of development is alarming as the Historic Basin is literally changing before our eyes. It is hard to escape the assumption that the cable car was envisioned as a way to multiply the numbers of visitors to these sites

and bypass Palestinian neighborhoods. If built, the cable car would ferry thousands of people a day to the City of David site and the mega tourism compound (called the Kedem Center) scheduled to be built just outside the Old City walls.¹⁵

The Cable Car

In May 2017, the Israeli government gave its approval for the first phase of a plan to construct a cable car¹⁶ from West Jerusalem to Dung Gate (see Kedem Center station on the map). The cable car aims to connect West Jerusalem to the Old City and the tourist sites just outside of it via Mount Zion.

According to the plan submitted to the National Infrastructure Committee (NIC) in October 2018, the cable car will operate at 72 cars an hour with a capacity of up to 3,000 people. In the first phase, the cable car route will comprise three stations: from the First Station in the neighborhood of Baka/Abu Tor in West Jerusalem to Mount Zion, and from there to the aforementioned Kedem Center at the entrance to the Palestinian neighborhood of Silwan across from Dung Gate. In addition, a depot for the cars will be built in the neighborhood of Abu Tor. The total length of the route is 1.4 km. The second phase of the plan, not yet approved, includes stations on the Mount of Olives and the

Siloam Pool at the edge of the Wadi Hilweh neighborhood of Silwan. Between station 1 and 2, the route will traverse the Ben Hinnom Valley, an ancient place of burial and ritual on the outskirts of the ancient city. In between stations 2 and 3 the cable cars will move outside and along a segment of the southern side of the Old City walls, part of the World Heritage Site.



Fig. 2: View of Abu Tor neighborhood and Ben Hinnom Valley from Mt. Zion.

Photo: Emek Shaveh

The Jerusalem cable car is a government initiative promoted by the Minister of Tourism and the Jerusalem Development Authority (JDA, a joint body belonging to the city's municipality and the national government). The ministry has defined the project as a "national priority," a category usually reserved for advancing massive infrastructure and road construction projects. The plan has therefore been processed in an unusual route thereby circumventing the local planning committees and the need to subject the plan to a conservation file.

The cable car plan has drawn fierce criticism. In October 2018, seventy Israeli public figures including leading figures in archaeology and architecture published a petition against the cable car saying "*Jerusalem is not Disneyland and its treasures of landscape and its heritage are not negotiable currency.*"¹⁷ In March 2019, leading international architects published a letter calling on Israel to halt the plan. The letter



Fig. 3: Ben Hinnom Valley, view from Mount Zion.

Photo: Emek Shaveh



Fig. 4: The Ben Hinnom Valley and the neighborhood of Silwan. Photo: Emek Shaveh



Fig. 5: St. Onuphrius Monastery (Hakeldama) in Ben Hinnom Valley.

Photo: Emek Shaveh



Fig. 6: Simulation of planned cable car crossing the Ben Hinnom Valley. Photo: Emek Shaveh

signed by 27 leading figures including Ron Arad, Moshe Safdie, Santiago Calatrava, Peter Eisenman and Thom Mayne said "*It is a matter of international consensus that the choice of a cable car is not appropriate for ancient cities with a skyline preserved for hundreds or thousands of years.*"¹⁸

At the public objections phase of the plan, hundreds of individuals represented by multiple organizations submitted objections. The objections included complaints that the plan undermines a hundred years of conservation in historic Jerusalem; that it will be highly damaging to the character of the WHS Jerusalem's Old City and its Walls and a blight on the skyline of the WHS buffer zone; that the cable car would reroute tourists through Dung Gate, leading them away from the traditional entrance through Jaffa



Fig. 7: A simulation of the planned cable car over the homes of residents in Silwan and along the Old City walls. Photo / Computer animation: Emek Shaveh

Gate and thus detrimentally impact commerce and tourism in the Muslim Quarter; that the planners ignored capacity limits and sustainability issues for the Old City; that the project was misrepresented as a public transportation initiative when in fact it is a touristic venture that will cause untold damage to the character of the historic city and to the residents whose homes are situated under the proposed route of the cable car.¹⁹

Despite the unprecedented opposition for a national project, most of the objections were dismissed completely or only partially addressed. In June 2019 the NIC committee voted in favour of submitting the plan for governmental approval. On November 4th the government (currently a transitional government) approved the plan with a budget of 220 million NIS (60 million Euro).

UNESCO's response to the cable car to date came at the 43rd session of the WHC in June 2019, within the framework of Item 7A of the provisional agenda²⁰, the discussion on current conservation issues mentions letters co-signed by the Permanent Delegations of Jordan and Palestine where they expressed concern over the cable car project. In its 207th session the Executive Board addressed the cable car in Item 38 of the provisional agenda, describing attempts to gain information about the project from Israel without success.²¹



Fig. 8: A simulation of the cable car along the Old City walls.

Photo / Computer animation: Emek Shaveh

Recommendations

In light of the imminent threat posed to the WHS by the cable car and other projects:

- We call on the World Heritage Committee to prepare a Statement of Outstanding Universal Value for the Old City of Jerusalem and its Walls, review the boundaries of the WHS and determine a relevant buffer zone in accordance with the Operational Guidelines.²²
- We request the WHC to prepare a Desired State of Conservation document for the removal of the property from the World Heritage List in Danger.
- We request as a matter of urgency to update the 2007 Action Plan to address new risks and threats to the heritage values in and around the Old City of Jerusalem and its Walls, including the absence of a comprehensive approach to pilgrimage and tourism and unsustainable development projects, such as the cable car, that threaten the composite fabric of the historic city, its context and setting.



Fig. 9: Section of Old City wall along which the cable car is planned to be built. View from Mount Zion. Photo: Emek Shaveh

- We ask the World Heritage Center to initiate a process of drafting a management plan for the protection and conservation of Jerusalem's multi-layered ancient sites and monuments by independent experts in consultation with concerned parties and stakeholders.

Yonathan is the Founder and Executive Director of Emek Shaveh (2009-2019), an Israeli NGO working to protect Jerusalem's Old City Basin as a multi-layered and multicultural historic city. Emek Shaveh approaches the sites and monuments of Jerusalem as shared heritage sites and believes that archaeological sites cannot constitute proof of precedence or ownership by any one nation, ethnic group or religion over a given place. Yonathan has an MA in archaeology from the Hebrew University of Jerusalem (HUJI). He worked as an archaeologist with the IAA (Israel Antiquities Authority) in East and West Jerusalem and has participated in multiple excavations led by HUJI professors as well as community-led digs. His excavations were published in Israeli academic journals.

Ressources

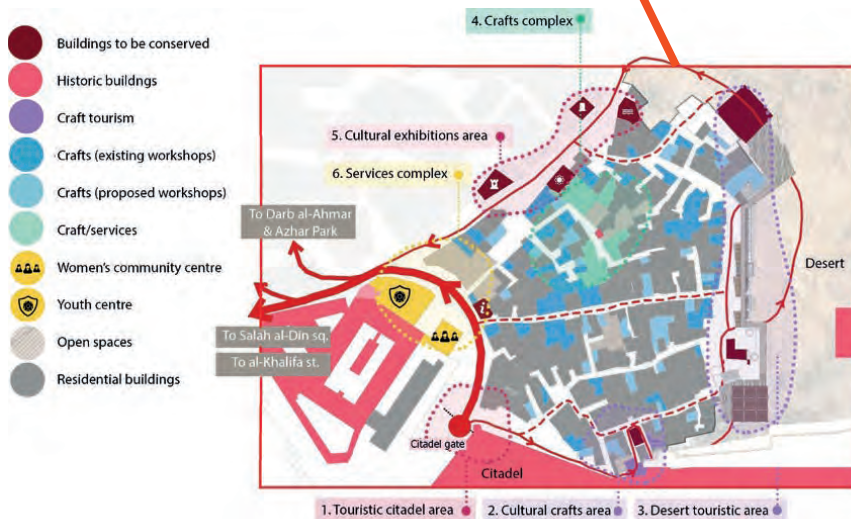
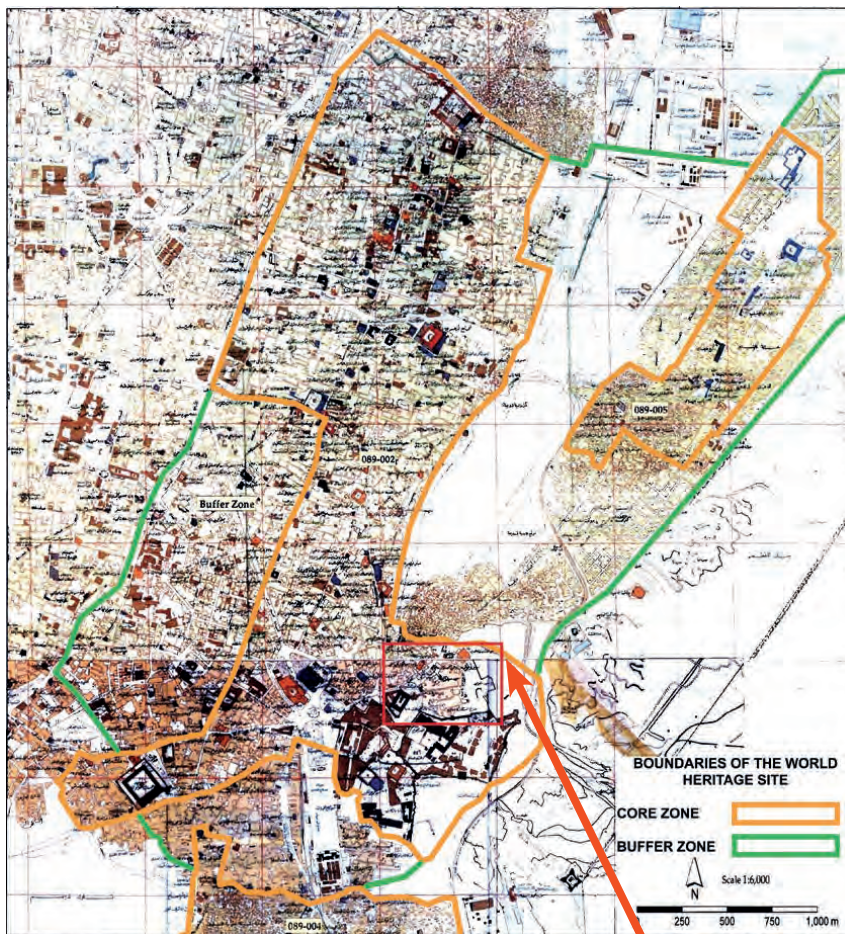
- 1 Old City of Jerusalem and its Walls: Description (N.D). UNESCO website. Retrieved December 12, 2019.
- 2 Old City of Jerusalem and its Walls (Jerusalem (site proposed by Jordan)) (N.D). UNESCO website. Retrieved December 12, 2019.
- 3 It went into force a year later. For more information: Israel Ministry of Environmental Protection, (2015). World Heritage Convention. Israel Ministry of Environmental Protection website. Retrieved December 12, 2019.
- 4 The most comprehensive provision in IHL dealing with the duty to protect and preserve archaeological finds in conflict zones is the Hague Convention for the Protection of Cultural Property in the Event of Armed Conflict of 1954. The Convention has two accompanying protocols from 1954 and 1999. Israel is a signatory to the first but not to the second.
- 5 The International Covenant on Civil and Political Rights (1966), and the International Covenant on Economic and Social Rights (1966), both articulate the principle of a people's sovereignty over cultural assets and natural resources. These principles are enshrined in the UNESCOs Convention on the Protection of the World Cultural and Natural Heritage of 1972, and the UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export and Transfer of Ownership of Cultural Property of 1970. Israel has not signed the latter.
- 6 Emek Shaveh (2014). Unesco's latest decision on Jerusalem – November 2014 update. Emek Shaveh website. Retrieved December 12, 2019.
- 7 UNESCO (N.D), Action Plan for the Safeguarding of the Cultural Heritage of Jerusalem, p.2. Retrieved December 12, 2019.
- 8 WHC decision report (2010). 34 COM 7A.20. Retrieved December 12, 2019.
- 9 WHC decision report (2016). 40 COM 7A.13. Retrieved December 12, 2019.
- 10 Executive Board 200th Session (2016), Occupied Palestine Draft Decision, 12 October 2016. Document code: 200 EX/PX/DR.25.2. Retrieved December 12, 2019.
- 11 France24, 2017. US, Israel withdraw from 'biased' UNESCO. France24. Retrieved December 12, 2019.
- 12 Greenberg, R. (2018). 150 Years of Archaeology and Controversy in Jerusalem. In Routledge Handbook on Jerusalem, Mourad, S., Koltun-Fromm, N., and der Matossian, B. (eds) London, pp. 363-376.
- 13 Ibid, p. 364
- 14 Emek Shaveh, (2017). Press Release: The Israel Antiquities Authority's plan to excavate beneath Silwan, all the way to the Western Wall Plaza. Retrieved December, 12, 2019.
- 15 Emek Shaveh, (2016). Press Release: Decision to approve Elad's "Kedem Compound" plan in Silwan awakens fear of extreme politicization of planning and building institutions. Retrieved December 12, 2019.
- 16 TOI Staff (2017), Cabinet Approves Building Cable Car to the Old City, *Times of Israel Website*, Retrieved December 12, 2019.
- 17 Surkes, S. (2018). Israel Prize winners call on government to cancel Jerusalem Old City cable car. *Times of Israel website*. Retrieved December 12, 2019.
- 18 Surkes, S. (2019). Internationally renowned architects add opposition to Jerusalem cable car plan. *Times of Israel website*. Retrieved December 12, 2019.
- 19 The Objections to the cable car plan from the NIC special researcher's report (in Hebrew) not available publicly.
- 20 WHC decision report (2019). 43 COM 7A.22. Retrieved December 12, 2019.
- 21 UNESCO (2019). Item 38 of the provisional agenda. Executive Board 207th session. Retrieved December 12, 2019.
- 22 In 2000 Israel tendered a request to add a buffer zone to the World Heritage property in accordance with the Operational Guidelines for the Implementation of the WHC that would include Mount Zion. The Tentative List and World Heritage Sites of the State of Israel (2000), p.30, Education Ministry website, Retrieved 12 December, 2019.

The Al-Hattaba Development Project in Historic Cairo is at Risk

May al-Ibrashy, Athar Lina



Fig. 1: The location of al-Hattaba within the Historic Cairo World Heritage Site. Map: UNESCO / adapted by Andrea Martinez



The Athar Lina Initiative has been working in al-Hattaba - the neighborhood at the foot of the Citadel of Salah al-Din within the World Heritage Site of Historic Cairo - since May 2018 and up till now. The main objective of our work, which is run by Megawra | Built Collective in partnership with the Ministry of Tourism and Antiquities, is to prepare a proposal for the conservation and regeneration of al-Hattaba based on the international guidelines for the management of World Heritage Sites. It also builds on a previous conservation study for al-Hattaba that was prepared by UNESCO and submitted to the Egyptian Government within the framework of UNESCO's¹ research project for the Urban Regeneration of Historic Cairo.

Athar Lina's proposal was accepted in principle by the Ministry of Antiquities' Permanent Committee for Islamic and Coptic Monuments in October 2018. The National Organisation for Urban Harmony also reviewed the proposal and stated that it is in accordance with its regulations for Area A of Historic Cairo, that al-Hattaba is part of. It should also be mentioned that the proposal builds on the outcome of a six-day workshop, organized by Athar Lina and attended by representatives of the Ministry of Antiquities, Cairo Governorate and the Informal Settlements Development Fund (ISDF).

1 https://whc.unesco.org/en/list/89/multiple=1&unique_number=95

Fig. 2: The General Master Plan for the al-Hattaba Project Area. Map: Athar Lina



Fig. 3: The mosque of Emir Shaykhu, one of the important monuments in al-Hattaba. Photo: Athar Lina

Athar Lina has also been working on the implementation of small pilots in the area. They include transforming a vacant dump into a small community garden opposite Dar al-Mahfuzat, as well as restoring al-Shurafa Shrine on Darb al-Sahrij. The conservation project also includes the urban upgrade of the touristic route from the Citadel Gate to al-Shurafa Shrine. Athar Lina Initiative also works with the residents of al-Hattaba on developing the handicrafts being produced there, particularly *khiyamiyya* (patchwork) and mother of pearl inlay.

Athar Lina's interest in al-Hattaba came about because of the area's location adjacent to the Citadel of Salah al-Din. Historically, this meant that its development is linked to that of the Citadel. Many of its important buildings serviced the Citadel or serviced the pilgrimage road which started at al-Hattaba and was the route of the yearly procession carrying the Ka'ba Cover from the Citadel to Mecca. Adding to al-Hattaba's uniqueness are the sloping streets overlooking the monuments of al-Darb al-Ahmar and Azhar Park, in addition to its traditional handicrafts.

The decision of the Government to list al-Hattaba as an informal settlement at grade 2 risk rendered it susceptible to eviction and demolition, which goes against international regulations for protecting historic areas. In response to that, Athar Lina took the decision to study al-Hattaba, in cooperation with the relevant government and community stakeholders. Proposed solutions are in line with conservation guidelines for historic areas and respond to urgent issues such as the poor structural state of some of its buildings and the need for socio-economic development.

It has come to our attention that the authorities have started the procedures of survey and resident count which is often the first step in the process of eviction and demolition. We do not know if the plan is for partial or full dem-

olition. According to Egyptian law, grade 2 informal settlements should be 're-planned' which gives the decision-makers a chance to develop the area and keep the residents in place without demolishing.

We would therefore like to reiterate the following:

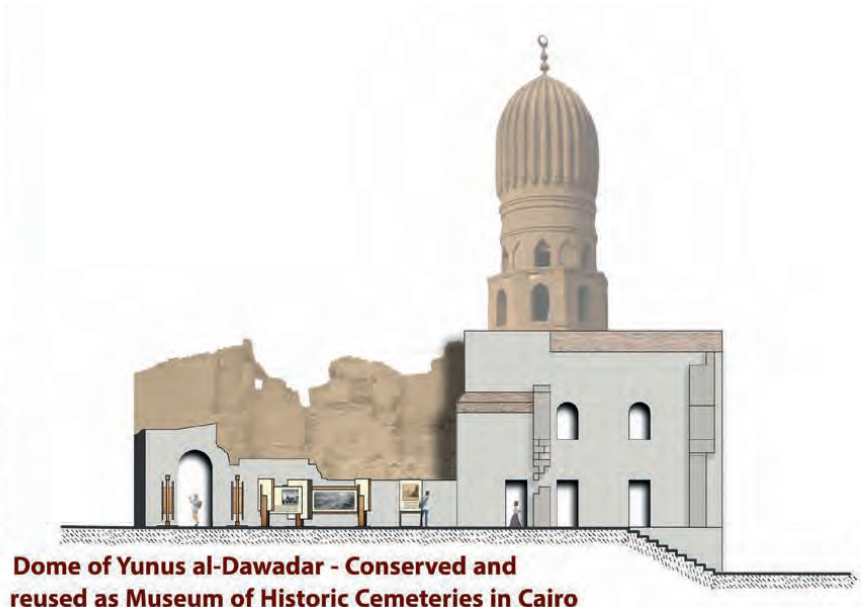
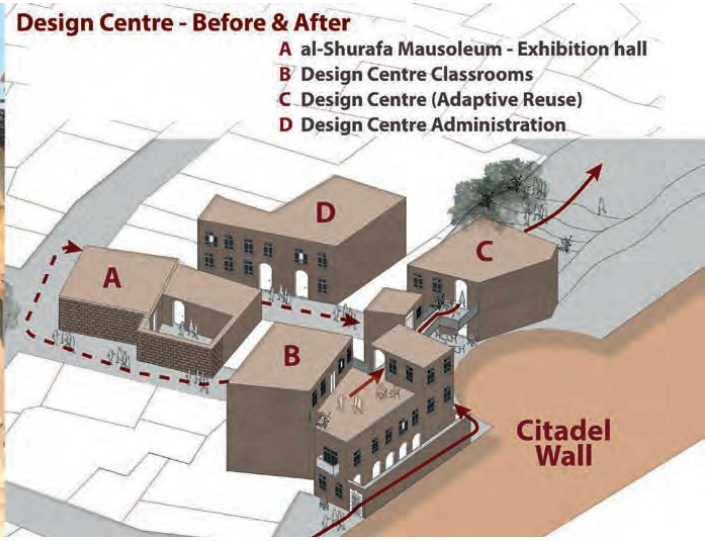
1. Al-Hattaba is a historic area that has kept its urban fabric since the 18th century. It includes a number of monuments and historic buildings with unique styles.
2. Al-Hattaba lies within the Citadel buffer zone and as such is under the jurisdiction of the Ministry of Tourism and Antiquities. Any urban intervention should be in consultation with the ministry and based on the international guidelines for heritage management and conservation of historic urban fabric.
3. Al-Hattaba is a historic area that falls within the borders of Historic Cairo, which is listed as a World Heritage Site because of its tangible and intangible heritage, represented in its residents, buildings, urban fabric, and the social and economic life within it. In accordance with the agreement between the Egyptian Government and UNESCO, the Ministry of Tourism and Antiquities is responsible for the conservation of urban fabric and social life in the area.
4. Al-Hattaba is an area rich in traditional crafts such as mother of pearl inlay and *khiyamiyya* (patchwork). As such, it constitutes one station in a craft production chain within Historic Cairo that includes al-Darb al-Ahmar, al-Khiyamiyya, and Khan al-Khalili. Moving the handicraft workshops away from al-Hattaba will disrupt the production chain, adversely affecting these crafts and maybe leading to their extinction.

We therefore strongly urge the authorities to work on developing the area instead of evicting its residents and demolishing it, to preserve it as a residential-craft area, and develop it as a touristic site connected to the Citadel. This will allow tourists to enter the Citadel from the gate on Salah Salim Street, and leave from the New Gate in al-Hattaba, then to continue along their itinerary by visiting al-Hattaba and the sites around such as Darb al-Labbana, Bab al-'Azab, the mosques of Sultan Hasan and al-Rifa'i, al-Saliba Street, Amir Taz Palace and Ibn Tulun Mosque, down to al-Khalifa Street and al-Sayyida Nafisa Mosque, thus achieving maximum economic and social benefits from tourism.

We welcome the opportunity to submit all the studies we have prepared in the course of our work on al-Hattaba Development Project and to cooperate with all the relevant parties to improve the studies to reach the best possible results.

Photographic Documentation: Planned rehabilitation of the al-Hattaba neighbourhood

All illustrations by Athar Lina



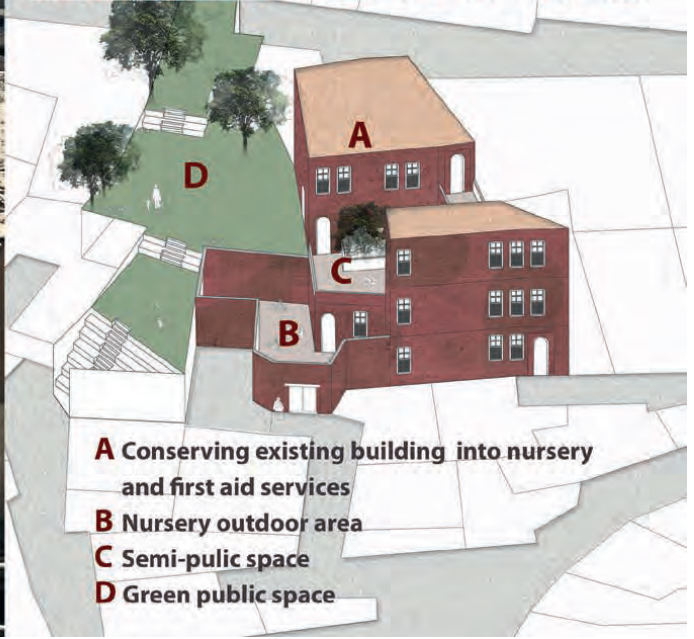
Dome of Yunus al-Dawadar - Conserved and reused as Museum of Historic Cemeteries in Cairo



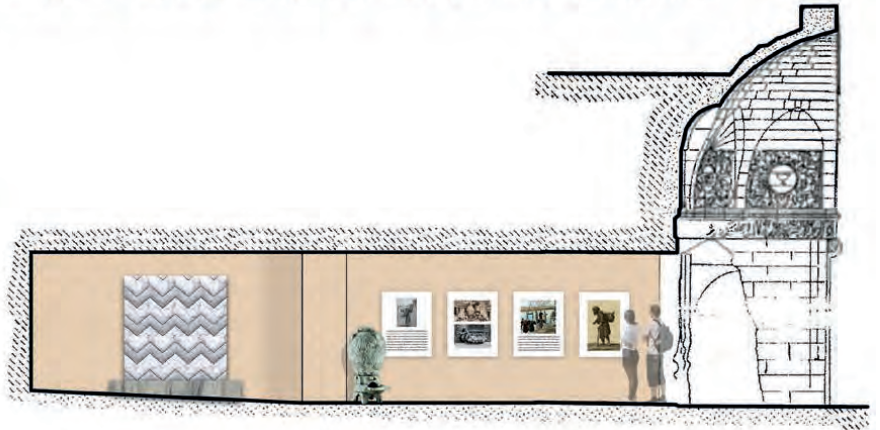
Abd al-Rahman Katkhuda Trough - Conserved and reused as Museum of Water in the History of Cairo



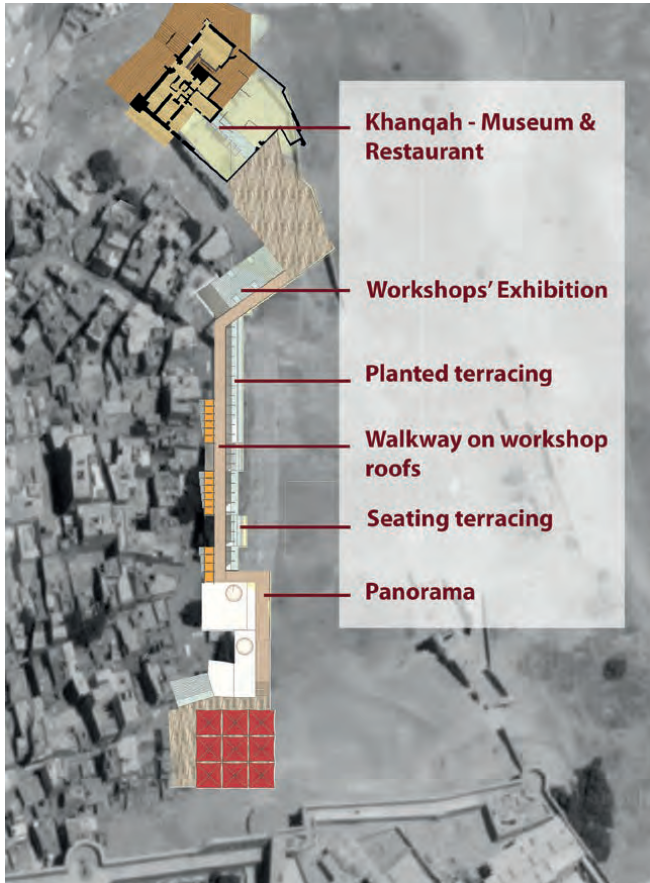
Nursery attached to public space - before and after



Sabil al-Amir Shaykhu - Conserved and reused as Museum of History of Hajj



al-Khanqah al-Nizamiya and the proposed desert promenade behind it with view of the Citadel



Protecting the Medina of Tunis: Reflections on Current Challenges and Initiatives

Nora Lafi, Max-Weber-Kolleg, University of Erfurt

Since the 2011 Revolution, the Medina of Tunis, part since 1979 of the UNESCO World Heritage List, has been subjected to the emergence of a new governance context as well as to renewed pressures, that tend to illustrate the potentially splintering dynamics of urban conservation and transformation. The object of these reflections is to interpret such new conditions under the light of the history of heritage protection in Tunis and to highlight the main stakes as far as heritage, conservation and social change are concerned.

In the case of Tunis, reflections on the protection of the built heritage need to integrate the dimension related to Ottoman governance. In Ottoman times indeed, on the basis of medieval principles (Daoulatli, 1976), the built structure of the medina was protected by a set of rules pertaining to the

governance of properties, monuments and public amenities. Such rules were part of the governance system of the old regime municipality, that was headed by the *Sheikh al-Medina*: the Chief of the City, whose seat was a prestigious palace of the medina. Regulations also emanated from the world of guilds and confessional communities. *Wafqs*, or *habous* (private and public endowments governing properties, amenities and utilities) allowed protection to be planned in the *longue durée*.

Every monument or public service was the object of funding destined to provide for its maintenance in an unlimited future. This framework did not impede urban transformations, sometimes of important scale like with the construction of new commercial complexes in Ottoman times, but imposed a civic supervision of urban change that was

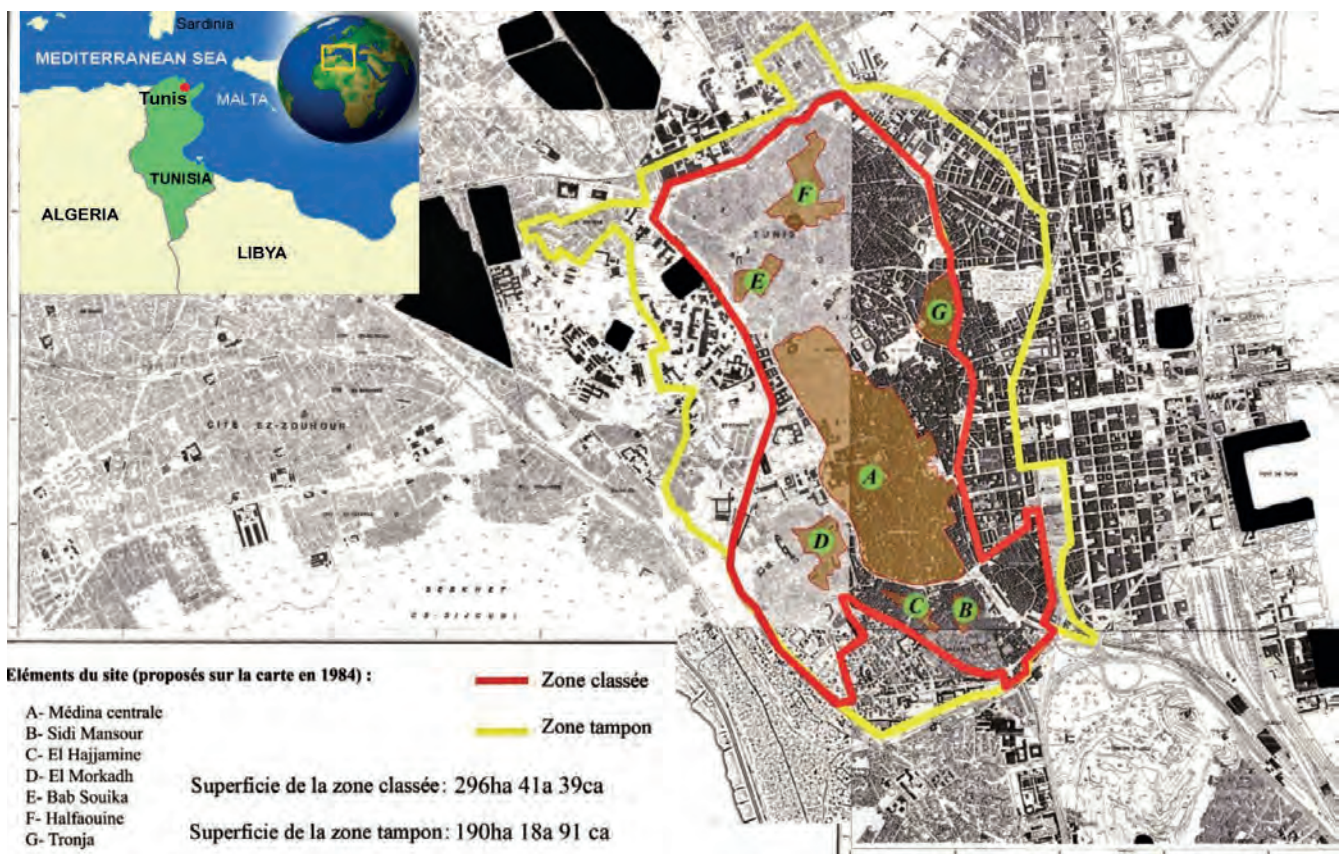


Fig. 1: Map of the medina inscribed in the World Heritage List, and its buffer zone.

Map from: https://whc.unesco.org/en/list/36/multiple=1&unique_number=1744

the mirror of the organization of the whole society. Families of notables, who owned prestigious houses in the medina (Revault, 1967; Saadaoui, 2001; Bachrouch, 2008; Abidi, 2013), had a civic responsibility at the scale of their neighbourhoods, and the population in its social and confessional diversity was involved in the daily governance of urbanity.

The colonial period introduced significant changes in this organization, with for example the creation in 1885 of the *Service des Antiquités et Arts de la Régence* (that became the *Institut national d'Archéologie et d'Art* with Independence (1956) and the *Institut national du Patrimoine* in 1993, with seat in Dâr Hussein, the palace that had hosted the reformed Ottoman municipality in the late-1850s). On the one side, heritage as a category was theorized and applied mostly to the most relevant monuments (religious and palatial) of the medina. On the other hand, it largely cut the governance of heritage protection from its civic roots by imposing a bureaucratic supervision that was part of the colonial apparatus of social and spatial control. This development also followed a trend that had begun in the mid-19th century during the period of the Ottoman reforms (*tanziimat*) with numerous families of notables (*beldi*) settling in the northern periphery of the city (Carthage, La Marsa) (Ben Achour, 1989; Ammar, 2007).

The end of the colonial period was marked by a series of traumatic events that profoundly altered the medina. The American and British aerial bombings of December 1942 severely damaged the medina and its surrounding neighbourhoods (ANT; Driss 1979). The Bizerte bombings of the same period also brought a wave of refugees to the medina, with the result of dramatically increasing its density. The post-War period was marked by an aggressive destruction of some of the damaged sections of the medina, with the result of altering its very structure. Following a master plan of 1935, a new plan by architect Clément Cacoub and then by architect Bernard Zehrfuss and engineer Mohamed Annabi also foresaw massive destructions in the medina, with the aim of excavating a new boulevard in the middle of it (Oueslati 2006; Bejaoui 2013; Demerdash 2015).

During the late-colonial period and the first decades of Independence, populations of rural origins settled in the medina, further modifying its social composition and density. This resulted in a change in the relationship between the inhabitants and the notion of heritage preservation. At the end of the 1960s, almost two-thirds of the household-heads of the medina were born outside Tunis and about a third of the houses of the medina were inhabited by more than 4 families (Eckert 1975; Daoulatli *et al.* 1982; Miossec 1985). This resulted in profound alterations of the private built heritage. This phenomenon has been called *wakalisation* (or *oukalisation*) (Ferjani 1986; Atelier d'urbanisme 1972).

It is in this context that the *Association de Sauvegarde de la Médina* (ASM) was created in 1967 under mayor Hassib ben Ammar. It launched a series of campaigns asking for the protection and renovation in the old city (Binous and Eckert, 1975; Akrouit-Yaïche 2002; Béjaoui 2005; Béjaoui, 2013). Combining opposition to the excesses of modernist urban planning and discourses on the social aspects of heritage conservation, the *Association* embodied local voices acting against State-led bureaucratic planning as well as a symbolic return of families of notables to the medina. This conflict resulted in the cancellation of plans aiming at destructing the structure of the medina and in the emergence of a new civic conscience about heritage.

In the context of discussions about a new plan for the medina by architects Ludovico Quaroni and Giancarlo De Carlo in the early 1970s, the *Association* proposed the neighbourhood of the Hafsia as a laboratory of heritage protection and social management (Daoulatli *et al.* 1982). Other neighbourhoods like Halfaouine and Bab-Suika were progressively the object of such attentions (Trabelsi 2011). International contacts with the Ford Foundation, Icomos and UNESCO (Association, 1975; Daoulatli *et al.* 1982) led to the 1979 decision by Unesco to include the medina on its list of sites of the World Heritage (Abdelkafi 1989; Moulhi *et al.* 1999).

There were however numerous social ambiguities in this new phase, as the aim of most programmes of rehabilitation was to drastically diminish the density of the population of the medina (Micaud 1978; Association, 1981). The population was reduced from 147.000 to 102.000 between 1975 and 1984 (Ben Hadid 1985; Ferjani 1986). Inside the medina, about 400 houses were restored for about 1.600 families (*Observatoire International des Maires*, 2015) but many residents were expelled and joined illegal settlements in the periphery of the city.

Under the dictatorship of President Ben Ali, in convergence with programmes and loans by the World Bank aiming at a liberalization and commodification of the heritage sector (World Bank, 2001), contacts were made with investors in order to transform parts of the medina in luxury hotels, on what was perceived as the "Marrakesh model". Some of the historic palaces of the notability (*Dâr*) were restored under the form of luxury restaurants like Hamouda Pacha (previously damaged by the construction in 1940 of a bunker, by its wakalisation in the post-war period and then by its transformation into a textile factory – Binous, 2001) and Dar el Jeld (owned by investor Abdelkefi since the 1930s, it was transformed into a hotel in 1948 – Binous, 2001). Among the most active investors was the Singapore-Tunisian Investment Company (STIC), created in 1990 by investor Laroussi Guiga and Tycoon Henry Ngo (Bonvests Investment) (Ben Ameer, 2014).

After the 2011 Revolution, most of the projects were temporarily stopped due to the political turmoil and to the reconfiguration of the networks of connivance between investors and authorities. On the other hand, the Revolution allowed a certain easing of the official supervision on the preservation of the medina's structure and many small-scale transformations were enacted in violation of the 1994 Heritage Code. In 2016, a new set of rules pertaining to town planning in the medina was approved by the central government for the municipality of Tunis (Plan, 2016). It defined zones of urban restructuring. Negotiations with potential investors had in-between already restarted. Among



such investors was Laroussi Guiga, the owner of the Résidence Hôtel in the Northern Periphery of the City (opened in 1996 with STIC) who bought in 2013 for 1.3 million euros from publisher Mohamed Salah Bettaieb (*Maghreb Confidentiel*, 2013; Vasko, 2015) the beautiful palace of the *Sheikh al-Medina* in rue Sidi Ben Arous. In the context of a wave of acquisitions of historic palaces by magnates of the Tunisian economy, he also bought for entrepreneurs Ahmed Bouzguenda and Abdelwahed Ben Ayaed the neighbouring restaurant Hamouda Pacha with the intent of creating an integrated facility (*Maghreb Confidentiel*, 2014).

The plans that were initially evoked stated that the palace of the *Sheikh al-Medina* was going to be restored. But when the final plans were published, the idea had completely changed (Arrondissement de la medina, Permis de bâtir 2990, Feb. 2, 2016): the palace of the *sheikh al-medina*, which investors had deliberately left without maintenance and subject to degradation for years, was due to be destroyed, which happened in the spring and summer of 2019. The construction of the new Residence Medina hotel (Singapore Tunisian Investment Company Medina SA) began in the following months (*Maghreb Confidentiel*, 2019). This implied the complete destruction of an historic block in the very heart of the UNESCO protected medina.



Fig. 2-4: State of the palace of the Sheikh al-Medina in 2018 after decades of neglect.

Photos: Nora Lafi

REPUBLIQUE TUNISIENNE GOUVERNORAT DE TUNIS - Arrondissement de la Médina PROJET DE CONSTRUCTION D'UN BOUTIQUE HOTEL 5* THE RESIDENCE MEDINA MAÎTRE DE L'OUVRAGE: SINGAPORE TUNISIAN INVESTMENT COMPANY MEDINA S.A Hôtel The Residence - Les Côtes de Carthage - B.P.697 - 2070 La Marsa - Tunisie Tél: 71 73 91 57 - Fax: 71 91 39 99 - email: stlc.medina@gnet.tn	
PERMIS DE BATIR N°2990 DU 02/02/2016	
	
ARCHITECTE ZIN ARCHITECTURE Sahby GORGI & Denis LESAGE 40 rue Du Sireat 1082 Makville Ville El Menzah, Tunis, Tunisie  PHONE: 71865697 / 71287731 FAX: 71287731 E-mail: sahyby.gorgi@gmail.com denis.lesage@zigmail.com zin.architecture.akties@gmail.com	DESIGN INTERIEUR HIRSCH BEDNER ASSOCIATES Singapore 48 Kim Yam Road The Herencia, #01-10 Singapore 239351  PHONE: +65 6337 2511 FAX: +65 6337 2460
INGENIEUR C. STRUCTURE, FLUIDES & ELECTRICITE SEEC SOCIÉTÉ D'ÉTUDES D'EXPERTISES ET DE CONSEIL 17, rue Jean-Jacques Rousseau, Ensemble Babou, 1073, Montplaisir, Tunis, Tunisie  PHONE: 71 906 611 / 71 909 521 FAX: 71 906 254 E-mail: seec@planet.tn	BUREAU DE CONTROLE SOTUPREC Société Tunisienne de la Préviation et du Contrôle Technique SA 42, RUE IBN BASSEM, 1004, MENZAH 4 Tunis, Tunisie  PHONE: 71 754 437 / 71 754 443 FAX: 71 754 754 E-mail: sotuprec.tunis1@gmail.com
QUANTITY SURVEYOR OPTIMA INGENIERIE Hatem JAMMOUSI 20 rue El Miliad (ex rue Habib Achour), et Menzouh 1 - 1004 - Tunis - Tunisie  PHONE: 70741883 / 70741884 FAX: 70741882 E-mail: optima@ingoptima.tn Web: http://optima-ingenierie.com.tn	ENTREPRISE GENIE CIVIL SOTRAPRO Société Tunisienne de Réalisation et d'Assistance aux Projets 73, Avenue Louis Braille, Cité El Khadra Tunis - Tunisie  PHONE: 71 909 174 FAX: 71 909 176 E-mail: contact@sotrapro.tn

Fig. 5: The official presentation of the hotel project.

Photo: Nora Lafi

Furthermore, the destruction of the very building that had been in Ottoman times the seat of the institution in charge, among other competences, of the preservation of the built substance, and of urban governance in general on the basis of a civic spirit, is a sad reflection of the present threat that under-regulated investments pose to the medina. The style of the new hotel is a pastiche of historic palaces of the medina. The plans were made by architect Mohamed Sahbi Gorgi, owner of the Tunis-based ZIN architecture studio and by architect Denis Lesage, former heritage expert at the Institut national du Patrimoine (1992-2006) and former Technical Director of the *Unité de Gestion et de Valorisation du Patrimoine Culturel*, created in order to implement the programme negotiated with the World Bank under the Ben Ali dictatorship. It is another tragic irony of such current developments: a rhetoric of preservation is used to destroy a precious palace and civic *lieu de mémoire*. Heritage protection is just an empty imagery in that case and a tool of marketing. The visual evocation of historic buildings in the form of fakes barely hides the fact that the general philosophy was destruction.

Numerous mobilizations occurred against such evolutions, mirroring the vitality of the Tunisian democracy and civil society. Adnène Ben Nejma, *conservateur* of the medina at the *Institut national du patrimoine*, protested against the general context of speculation threatening heritage protection (Dahmani, 2018). In the context of protests by civil society against a projected new Law regulating heritage (Vidano, 2018), a petition denouncing numerous violations of the 1994 Heritage Code and the trend by authorities to easily allow investors to demolish instead of restore, was launched by activists and institutions, including ICOMOS Tunisia, As-



Fig. 6-7: The site in August 2019: Complete destruction of the palace. Photos: Nora Lafi

sociation de sauvegarde de la médina de Tunis, Association de sauvegarde de la médina de Mahdia, Patrimoine 19/20, Association tunisienne des urbanistes, Association monuments et sites, Association des amis de Carthage, associations WinouElTrottoir and WinouElPatrimoine, Association Be Tounsi, Association Beiti.

In 2020 even the most protected areas of the medina are endangered. Existing institutions like the *Association de sauvegarde* are not given the means to efficiently counter demands for destruction by investors. In order to preserve its heritage of urbanity, the medina of Tunis urgently needs to be the object of the invention of a new democratic and socially inclusive governance of heritage protection. As instruments for this sake, a moratorium on destructions in the medina until clearer conditions of implementation of the heritage protection code are in place; an updated inventory of threatened historical structures on the basis of recent cartographic documents produced by the ASM, and more precise conditions of implementation of the distinction between urban rehabilitation and urban renovation (Plan, 2016) in the medina, in accordance with the requirements for a UNESCO World Heritage Site, are needed.

References

- Jellal Abdelkafi, *La médina de Tunis*, Tunis, Alif, 1989, 277p.
- Beya Abidi, *Qusūr al-bayāt bil-ahwāz al-shamāliyya li-madīna Tūnis khilāl al-fitra al-husayniyya 1705-1957*, Tunis, LAAM, 2013, 604p.
- Sémia Akrouit-Yaïche, « Le rôle des acteurs locaux dans la gestion urbaine : l'expérience de la ville de Tunis », *Revue internationale des sciences sociales*, 2002, 172, p.273-278.
- Leïla Ammar, *La rue à Tunis, réalités, permanences et transformations : de l'espace urbain à l'espace public, 1835-1935*, Thèse de doctorat de l'Université Paris 8, 2007.
- Archives nationales de Tunisie (ANT), *Tunis-Journal*, 13/28-12-1942
- Association de Sauvegarde de la Médina de Tunis, *Projet Unesco : Guide de recherche détaillé*, August 1975.
- Association de Sauvegarde de la Médina de Tunis, *Réhabilitation de la médina : projet pilote Hafsia-Kherba*, Tunis, 1981, 57p.
- Atelier d'urbanisme de l'association de sauvegarde de la médina, *L'oukalisation en médina centrale de Tunis: étude des conditions d'occupation d'un habitat urbain historique*, 1972, 110p.
- Tawfik Bachrouch, *La médina de Tunis avant le protectorat*, Tunis, CERES, 2008, 922 p.
- Faïka Béjaoui, *Patrimoine social, patrimoine monumental*, Arcchip Programme, 2005.
- Faïka Béjaoui, *Le paysage urbain historique de Tunis: outil d'analyse du processus de patrimonialisation*, Icomos International Symposium, Costa Rica, 2013, p.107-129
- Mohamed El Aziz Ben Achour, *Catégories de la société tunisoise dans la 2e moitié du 19e s.*, Tunis, Institut national d'archéologie et d'art, 1989, 542p.
- Amina Ben Hadid, *Les opérations d'urbanisme dans le centre de Tunis: éléments de bilan et recommandations préliminaires*, Tunis 1985, 154p.
- Nabil Ben Ameer, « Le groupe STIC (The Residence) débarque en force dans la médina de Tunis », *Kapitalis*, December 24, 2014.
- Jamila Binous Jamila and Hédi Eckert, « Médina de Tunis: La morphologie urbaine », *Cahiers de la Méditerranée*, 1980 [report of 1971], 20-1, p.43-60.
- Jamila Binous and Salah Jabeur, *Maisons de la médina de Tunis*, Tunis, Dar Ashraf, 2001, 239p.
- Abdelaziz Daoulatti, *Tunis sous les Hafsides: évolution urbaine et activité architecturale*, Tunis, Icomos, 1976, 288p.
- Abdelaziz Daoulatti, Jamila Binous and Denis Lesage, « Les opérations intégrées de restructuration urbaine: l'exemple de la médina de Tunis », *Monumentum*, 1982, 25-4, p.253-274.
- Frida Dahmani, « Tunisie : le patrimoine urbain menacé de destruction », *Jeune Afrique*, July 31, 2018.
- Nancy Demerdash, *Tunisia, 1940-1970: The Spatial Politics of Reconstruction, Decolonization, and Development*, doctoral dissertation, Princeton University, 2015.
- Rachid Driss, « La Tunisie sous l'occupation allemande (Novembre 1942-Mai 1943) », *Les cahiers de la Tunisie*, 1979, 82, p.455-484.
- Hédi Eckert, *Struktur and Funktionen der Familie in Tunesien untersucht and beschrieben am Beispiel der Grossstadt Tunis*, 1975, Meisenheim am Glan, Hain, 311p.
- Mohamed Chérif Ferjani, « Le processus de ségrégation sociale et spatiale dans le Grand Tunis », in B. Gaenne and Philippe Haeringer (eds.), *Anthropologie et sociologie de l'espace urbain*, Lyon, GLYSI, 1986, p.151-159.
- Maghreb Confidentiel*, « Laroussi Guiga, cheikh de la médina », March 21, 2013.
- Maghreb Confidentiel*, « Les magnats se ruent sur la médina de Tunis », December 18, 2014.
- Maghreb Confidentiel*, « Après cinq ans, Laroussi Guiga et STIC lancent leur hôtel dans la médina », December 19, 2019.
- Ellen Micaud, « Urbanization, Urbanism, and the Medina of Tunis », *International Journal of Middle East Studies*, 1978, 9-4, p.431-447.
- Jean-Marie Miossec, « Urbanisation des campagnes et ruralisation des villes en Tunisie », *Annales de Géographie*, 1985, 94-521, p.38-62.
- Zoubéir Mouhli, Faïka Béjaoui, Foussoun Belhadj, Khaled Bouzid, *Espaces traditionnels, fonctions contemporaines: actes du colloque de Tunis, octobre 1999. 20ème anniversaire du classement de la Médina de Tunis sur la Liste du patrimoine mondial (1979-1999)*, Tunis, Association de sauvegarde de la Médina, 1999, 59p.
- Observatoire international des maires, *Sauvegarde du patrimoine culturel et historique*, 2015
- Plan d'Aménagement urbain de la commune de Tunis : règlement d'urbanisme*, Tunis, Ministère de l'équipement, de l'habitat et de l'aménagement du territoire, 2016, 167p.(Medina : p.31-65).
- Imen Oueslati, « La place de la médina de Tunis dans les projets d'aménagement de l'époque coloniale », *UrbaMag*, 2006. <http://www.urbamag.net/document.php?id=109>
- Jacques Revault, *Palais et demeures de Tunis (XVIe-XVIIe s.)*, Paris, CNRS, 1967, 368p.
- Ahmed Saadaoui, *Tunis, ville ottomane : trois siècles d'urbanisme et d'architecture*, Tunis 2001, 472p.
- Mohamed Trabelsi, *La médina de Tunis: tourisme, patrimoine et gentrification*, Mémoire de master, Université Paris 1, 2011, 117p.
- Lydia Vasko, « Singapore Hotels Go Abroad », *The Straits Times*, December 13, 2015.
- Adriana Vidano, « Quand le Ministère de l'équipement menace le patrimoine architectural », *Nawaat*, Mach 29, 2018.
- World Bank, *Project Appraisal Document on a Proposed Loan in the Amount of Euro 19.2 million to the Republic of Tunisia for a Cultural Heritage Project*, May 16, 2001, Ref. 20413-TUN.

Lamu Old Town under Increased Pressure from Proposed Mega Infrastructure Development

Mohamed Athman, Save Lamu

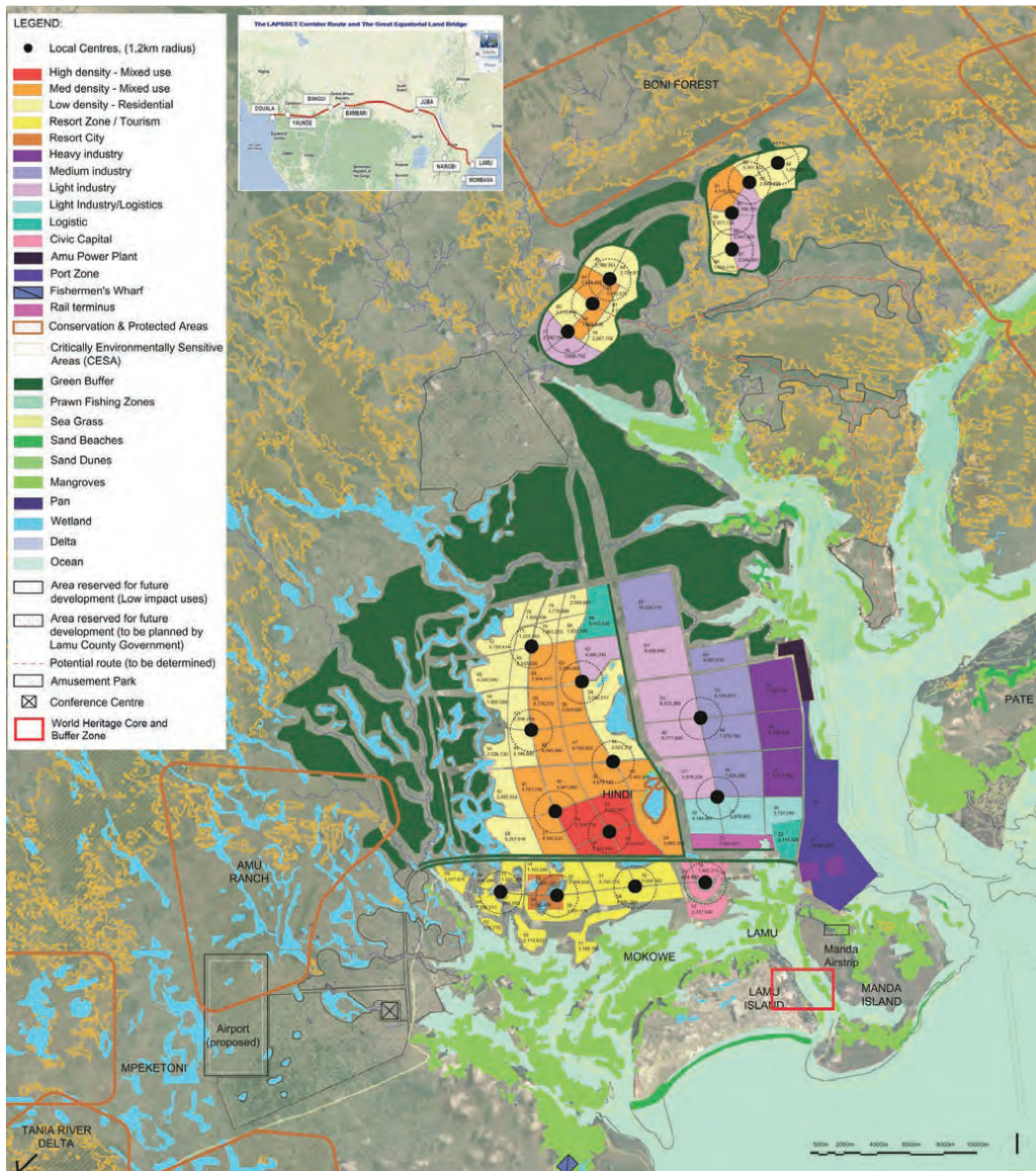


Fig. 1: By its sheer magnitude, the LAPSSET Project threatens to alter the integrity and character of the Old Town of Lamu World Heritage Site and its wider environment beyond recognition, and to completely overwhelm its inhabitants

Map: LAPSSET Development Authority (2018) / Stephan Doempke

The project will displace tens of thousands of people of Lamu County, exacerbate marginalization, increase the risk of conflict, threaten surface and groundwater resources, and degrade marine and mangrove environments essential to local traditions and livelihoods.

The impacts will damage the Outstanding Universal Value of Lamu Old Town, including our tangible heritage of pre-historic and historic archaeological sites,

Lamu Old Town World Heritage Site (Kenya) is in danger of being destroyed by the proposed Lamu Port South Sudan Ethiopia (LAPSSET)¹ Project, which includes a mega port, resort city, international airport, oil refinery, and a coal-fired power plant.

historic standing structures and buildings, bridges, cemeteries, and monuments of scientific and cultural value. The projects also threaten our intangible heritage of unique art and rituals, including calligraphy, woodworking, coral stone architecture, and artisanal fisheries. Our heritage creates strong pillars of dignity and respect within our community, adds to our wellbeing and sustainable socio-economic values.

¹ LAPSSET Development Authority (2018). Integrated Transport Infrastructure Master Plan For Lamu Port City.

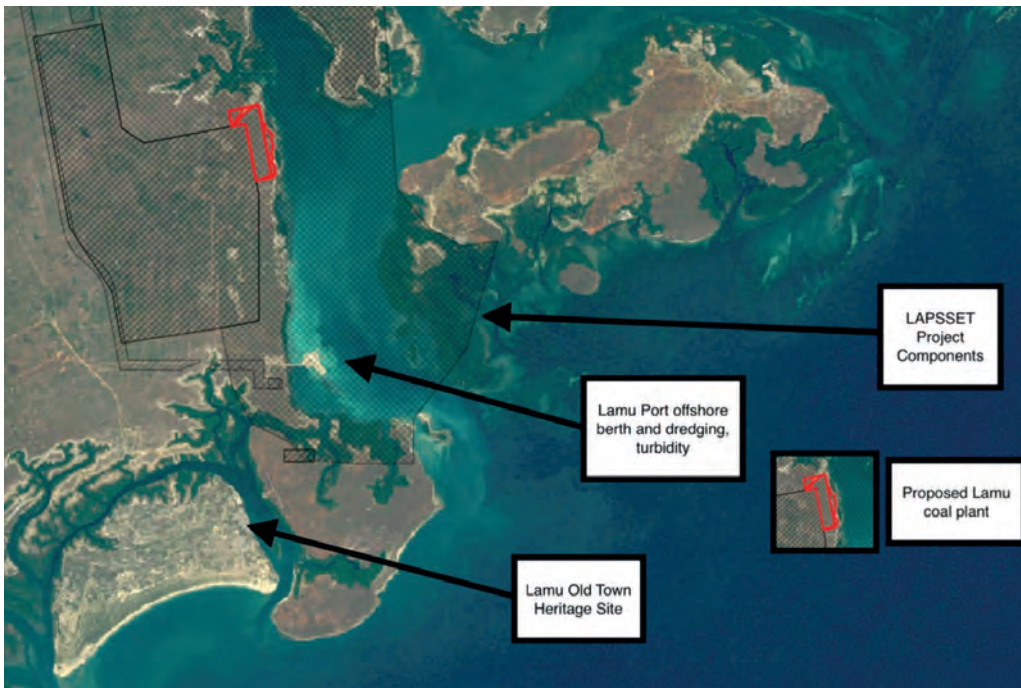


Fig. 2: The Lamu marine ecosystem. 2019 satellite image with infrastructure projects under development. Photo: Google Earth / Save Lamu

The development of a new port and associated infrastructure at Magogoni in Manda Bay near Lamu Old Town is underway with significant impact on ecosystems, including marine water quality, mangroves, coral reefs, and fisheries.

The conflict over the occupation and development along Wange Creek is already on the rise. There are issues of displacement, loss of livelihood, loss of traditional knowledge, practices, and cultures, social problems including alcoholism and prostitution, violations of human rights, loss of landscape/sense of place, socio-economic loss, loss of biodiversity, deforestation and loss of vegetation cover².



Fig. 3: Dredger operating in proximity to Lamu Old Town for the construction of the first of 32 berths for Lamu Port, with significant turbidity in Manda Bay, April 2019. Photo: Save Lamu

Resistance to these infrastructure developments is ongoing, including protests by indigenous and traditional communities, fishermen, NGOs, landless peasants, pastoralists and discriminated ethnic groups including the Bajuni, Aweer and Orma.

Legal Petition and National Environmental Tribunal Court

Though local and indigenous communities, environmentalists, architects and city planners voiced strong concerns against the projects, the state has moved ahead with implementation. In 2013 and 2015 two Petitions were filed against the state and investors by Lamu communities. The first was against LAPSSET and the second was against the Lamu Coal Power Plant. In 2017 and 2018 the court agreed that no proper EIA and HIA process had been done, and asked the National Environment Management Authority to cancel the licence for the coal plant, and the project proponents, Amu Power, to restart the process.

But the investors have gone back to court to appeal the decision. Furthermore, Save Lamu also filed a petition against LAPSSET in 2012, which was ruled in our favour in 2018 citing an unprocedural EIA and inadequate mitigation measures. However the Government has since not met any of the court requirements for consultation, compensation, and refinement of mitigation measures as mandated by the court decision. Instead, they have appealed the court decision. This shows that the court injunction is not sufficient to protect the World Heritage site and its wider setting.

² Daily Nation (2018). Lamu's Boni people cry foul over Lapsset compensation. <https://mobile.nation.co.ke/counties/Bonis-Lamu-Lapsset-compensation/1950480-4670916-im0huqz/index.html>

Status of World Heritage Site Management

Unfortunately, despite the court's ruling in favour of the local community requesting that the Kenya Government revise the Environmental Impact Assessment to ensure appropriate mitigation and compensation measures for LAPSSET and the Lamu Coal Power Plant, the Government of Kenya and the Project proponents, respectively, have instead gone to court to appeal the decision. Their appeal is still pending to date.

With regard to the management of the world heritage site, not only does an approved management plan for the Lamu old Town not exist, despite being mandated by UNESCO in 43.COM/7B.107, the towns' heritage has significantly deteriorated due to a drastic increase in population that is poorly managed. This is exemplified with the increase in vehicles in the old town.

Overall, the State Party is yet to meet the below requests made by the UNESCO World Heritage Committee at its 43rd Session (WHC 43.COM/7B.107):

- Revising the draft Strategic Environmental Assessment (SEA) of the LAPSSET Project to include an assessment of the individual and cumulative impacts of the project on cultural and natural heritage, including the impacts on the Outstanding Universal Value (OUV) of Lamu Old Town and the ecological services that support the wider community of the property, and by proposing mitigation measures.

- Carrying out a fresh environmental impact assessment for the Lamu Coal Power Plant in respect to the decision of the National Environmental Tribunal of 26 June 2019, No. NET 196.
- A Heritage Impact Assessment and Environmental Impact Assessment for the Lamu Coal Project that considers the impacts on the OUV of Lamu Old Town

We are requesting the World Heritage Committee on its 44th Session to:

1. Add Lamu Old Town to the List of World Heritage in Danger until the LAPSSET and Lamu coal plant projects are suspended pending completion of a revised LAPSSET Strategic Environmental Assessment, and a new Heritage Impact Assessment and Environmental Impact Assessment of the Lamu Coal Project that considers the impacts on the OUV of Lamu Old Town, as per WHC 43COM7B.107.8.
2. Urge Kenya to develop only clean, renewable energy (solar, wind or geothermal) within 50 km of Lamu Old Town World Heritage site, as per the *Policy for the Integration of a Sustainable Development Perspective into the Processes of the World Heritage Convention* (2015), Section 15.
3. Review whether Kenya is acting in alignment with the goal of limiting global warming to less than 1.5° C above the preindustrial average with the proposed construction of the Lamu coal plants and LAPSSET.



Fig. 4: Protest against LAPSSET organized by Save Lamu.

Photo: Save Lamu

V. Monuments and Sites

Vienna's Otto Wagner Hospital Am Steinhof – A Potential World Heritage Site in Danger

Christian Schuhböck, Alliance For Nature

ALLIANCE FOR NATURE®



Fig. 1: The Otto-Wagner-Hospital Am Steinhof in a painting of Erwin Pendl, 1907.

Photo © Alliance For Nature

The architectural ensemble of the Otto Wagner Hospital in Vienna's 14th district is a cultural heritage of exceptional universal value, rarely to be found anywhere in the world. In particular the institution's church "St. Leopold", named after the patron saint of Lower Austria, is a masterpiece of human creativity. The sacral building in Art Nouveau style, specially designed to meet the needs of the sick and frail, represents a highlight of Belle Epoque architecture. Accordingly, efforts have been made for years, to nominate the Otto Wagner Hospital for the World Heritage List and hereby place it under the protection of the international community. In contrast to the Austrian Federal Government, however, the Vienna city government, made up of Social Democrats and Greens, refuses to nominate this formerly most modern and worldwide exemplary hospital complex. Instead, the hospital operation will be dismantled and the 970,000 m² large area is successively obstructed, as a result of which its authenticity and integrity are increasingly lost.

The sanatorium and nursing home "Am Steinhof" – a "city within the city"

The Kaiser-Franz-Joseph-Landes-Heil- und Pflegeanstalt ("Emperor Franz Josef Regional Healing and Care Institution") in Mauer-Öhling (Lower Austria) for a thousand men-

tally ill people was built as an Art Nouveau pavilion facility under the lead of Carlo von Boog at the end of the 19th century, and was inaugurated in 1902 by the emperor himself. The open construction approach of the institution with 19 pavilions and a chapel, which was at the same time a "society house", in the middle of a huge park, represented an enormous progress in the care for mentally ill people. For the first time, new and more humane ideas were implemented in the healing and care of the mentally ill.

Although at the previous turn of the century society accepted that mentally abnormal persons were now to be regarded and treated as mentally ill instead of crazy, healing and care should take place as far outside the city as possible and not in the center of the city as before. Accordingly, the sanatorium and nursing home was built on the Gallitzinberg in the west of Vienna and thus on the outskirts of the city – easily accessible by public transport, but far enough to keep the distance between the sick and healthy.

It was also essential that the "Am Steinhof" sanatorium and nursing home should be the smallest possible burden to the general public, preferably as self-sufficient, autonomous and independent as possible, and that it should be able to sustain and manage itself. Supply of fresh air from the nearby Wienerwald and the connection to water supply

through the first Viennese high-quality water source pipeline were aimed to ensure that the institution could also to a certain extent provide itself with food. Agricultural areas and farms were established in which both employees, workers and patients carried out their work. Employment in agriculture and the different enterprises of the institution was an important part of the therapy and the recovery process. The fact of creating and doing something together distracted many patients at least to some extent from the disease, sometimes filled them with satisfaction and pride, but in any case reduced the feeling of being completely inactive and useless, of simply having to kill time.

The quiet and the less sick thus had a regular everyday life, were able to be trained in certain activities and even specialize in their field – similar to a profession in “normal civilization”. For this purpose, however, it was necessary that everything essential for life was in situ – and this requirement was met through “Am Steinhof”. From stables and garden houses to laundries and boiler houses to the administration building and its own church – everything was there. A “city within the city” – even with its own “society house”, in which the sick and the healthy performed, danced and acted.

“The City in the City” included on its opening on October 8, 1907, a sanatorium with 13 pavilions (870 beds), a nursing home with 11 pavilions (888 beds), a mental health home with 10 pavilions (356 beds), a spa hotel, two community centres and its own kitchen building, four buildings at the main entrance, the administration building along the main axis, and the community centre (today: Belle Epoque Theatre). In the farmyard there is a workshop building, a residential building, a building with horsehair combing and disinfection facilities, a laundry building, a boiler house, glass houses, a gardener’s house, horse and pig stables, an object for sausage production and fat melting, a gatehouse and a carriage house at the entrance to the farm, the mortuary with chapel of consecration and rest as well as a shed – a total of 60 individual objects (53.909 m²; 737.186 m³) with 518 sickrooms.



Fig. 2: Detail of a pavilion building.

Photo: Christian Schuböck

Carlo von Boog and Otto Wagner

The “Niederösterreichische Landes-Heil- und Pflegeanstalt ‘Am Steinhof’”, the present Otto-Wagner-Hospital (OWS), was conceived and planned by Carlo von Boog (1854-1905), who developed a “civil servant’s draft” for it. Since only limited funds were available, the Milan native adapted “the city in the city” to the terrain of the Gallitzinberg, whereby his wealth of experience from previous work in Mauer-Öhling met his needs.

At the same time, Otto Wagner (1841-1918), one of the most important architects of the Austro-Hungarian monarchy during the Belle Epoque, was busy with numerous buildings and infrastructure facilities. Among his most important works are the Vienna Stadtbahn (metropolitan railway), the Nussdorfer Wehr (Nussdorf weir system) and the quay on the Vienna Danube Canal as well as numerous commercial and residential buildings (Austrian Postal Savings Bank building, house of the insurance company “Der Anker”, Secessionist residential buildings on the “Linke Wienzeile” and many more).

As Vienna’s city planner, in addition to his numerous secular buildings Wagner wanted to realize a sacral building. The planning of “Am Steinhof” sanatorium and nursing home came just in time, and he submitted his “artist’s design” to the parliament of Lower Austria. He adopted Boog’s “civil servant’s draft” almost completely, but arranged the individual buildings in a symmetrical way. He gave his special attention, however, to the “St. Leopold” institution church, which he realized in Art Nouveau style with the participation of numerous outstanding artists and members of the Vienna Secession (including Koloman Moser and Othmar Schimkowitz). Today it is regarded as one of the most important sacral Art Nouveau buildings in the world.



Fig. 3: The theatre and memorial for the children abused for medical experiments.

Photo: Christian Schuböck



Fig. 4: The institution church “St. Leopold” with the figures of St. Leopold and St. Severin in the front of the cupola, created by Richard Luksch. Photo: Christian Schuhböck

Worthy of World Heritage status

Although almost all of the Otto Wagner Spital (OWS) is listed as a protected monument, the farm yard in the eastern part of the institution has been successively spoilt for years. In July 2012, “Alliance For Nature” therefore carried out a comparative and feasibility study on behalf of the citizens’ initiative “Steinhof erhalten” (“Safeguard Steinhof”) – with the result that the Otto Wagner Hospital with its St. Leopold institutional church even meets four of UNESCO’s World Heritage criteria, (i) (ii) (iv) and (vi). In comparison with the other hospital complexes on the World Heritage List – “Hospital de la Santa Creu i Sant Pau” of Barcelona in Spain (criteria (i) (ii) and (iv)) and the Cabañas Hospice of Guadalajara in Mexico (criteria (i), (ii), (iii) and (iv)), the OWS also fulfils criterion (vi) – being a memorial of human atrocities due to mistreatment of children for “medical experimental purposes”.

In September 2012, the study was officially handed over to Maria Vassilakou, Deputy Mayor of the City of Vienna, and published as a book the following year. In this book, alternative options for a possible nomination for the UNESCO World Heritage List were also pointed out – namely as an independent World Heritage Site

or as an addition to the existing World Heritage Site “Historical Centre of Vienna”.

ICOMOS Heritage Alert

Since the Vienna City Government did not propose the OWS for Austria’s Tentative List and instead tolerated further demolition and construction on the OWS site, “Alliance For Nature” prepared a documentation to trigger the “ICOMOS Heritage Alert”. Based on the documentation, ICOMOS International then triggered the International Heritage Alert at the end of 2015 and sent a letter to the Mayor of Vienna, Michael Häupl, informing him that the OWS fulfils all the values that justify a nomination of the hospital complex as a World Heritage Site.

Nevertheless, in the Otto Wagner Memorial Year 2018, which was celebrated with exhibitions on the occasion of the 100th anniversary of the death of this extraordinary architect, no activities were undertaken with regard to the nomination of the OWS as a World Heritage Site. Even the numerous applications and petitions that have been made at state and federal level in recent years have so far had no effect. Instead, construction activities on the eastern part of the OWS is progressing undiminished, whereby the authenticity and integrity of this Art Nouveau ensemble is increasingly being lost.

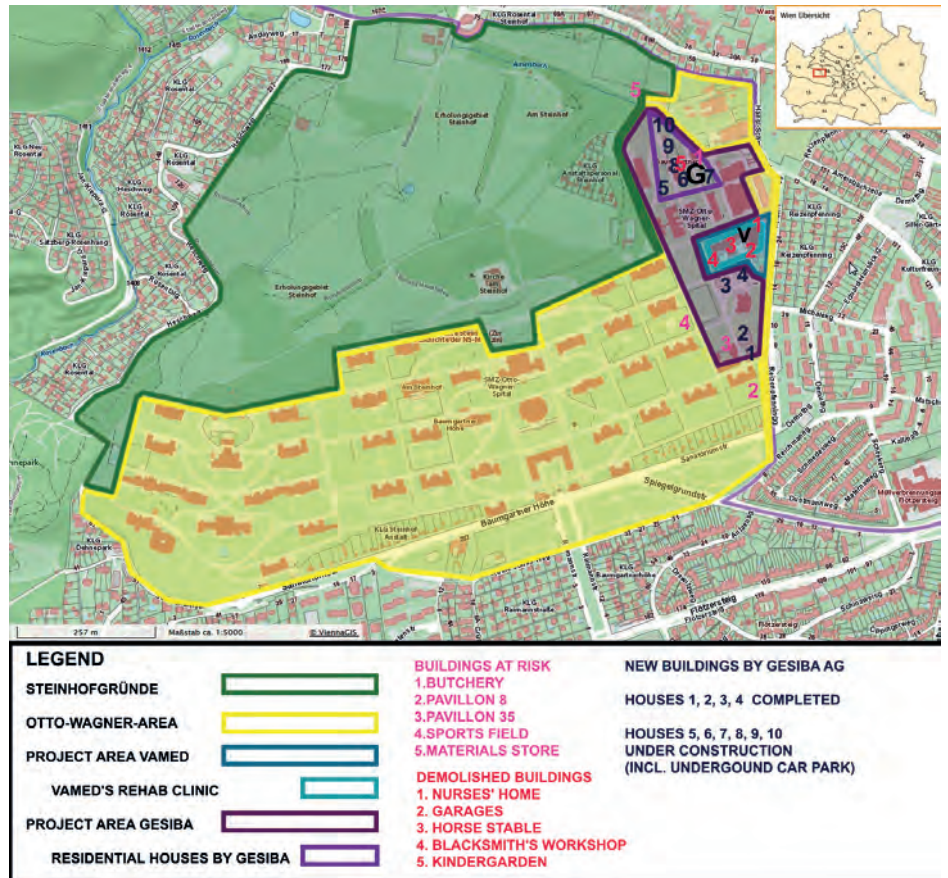


Fig. 5: Plan of the Otto-Wagner Hospital with the two project areas of Gesiba and Vamed in the eastern part of the OWS grounds. Map: Stadt Wien, ViennaGIS, MA22 / Andrea Martinez



Fig. 6: The decommissioned pathology building and a new GESIBA residential building (4).
Photo: Christian Schubböck



Fig. 7: GESIBA residential building (1).
Photo: Christian Schubböck



Fig. 8: GESIBA residential building (3) and decommissioned pathology building.
Photo: Christian Schubböck

The nursing home, a garage building, the horse stable, the smithy and the kindergarden have already been demolished and replaced by a rehabilitation center of the VAMED Corporation (an international corporation for planning, building and operating health projects). Furthermore, the city's own GESIBA settlement and construction company builds trivial residential blocks which don't match the Art Nouveau ensemble.

The extinction of the imperial heritage

Especially in times of the COVID-19 pandemic, the OWS, due to its pavilion system, would be ideally suited to keep patients apart. Instead, the hospitals built in the times of the Habsburg Danube Monarchy are closed and their departments relocated to newly constructed, giant block buildings such as the North Hospital in Vienna-Floridsdorf.

For decades we have observed that the capital city of Vienna, governed by social democrats, has gradually demolished buildings of the former imperial capital and residence city of the Austro-Hungarian Danube monarchy, and replaced them by commonplace buildings, which means that the imperial cultural heritage of one of Europe's most important metropolises is gradually being lost.



Fig. 9: GESIBA residential buildings (6) and (8) under construction; the construction pit for residential building (7) in the foreground.
Photo: Christian Schubböck



Fig. 10: VAMED building.
Photo: Christian Schubböck

References

- <https://www.icomos.org/en/get-involved/inform-us/heritage-alert/current-alerts/5453-icomos-heritage-alert-otto-wagner-hospital-steinhof-vienna>
<http://www.steihof-erhalten.at/>
 Christian Schubböck: Otto-Wagner-Spital "Am Steinhof". Vienna: Kral 2013

Relocating Ancient Ram-headed Sphinxes from the Karnak Complex

Anonymous¹

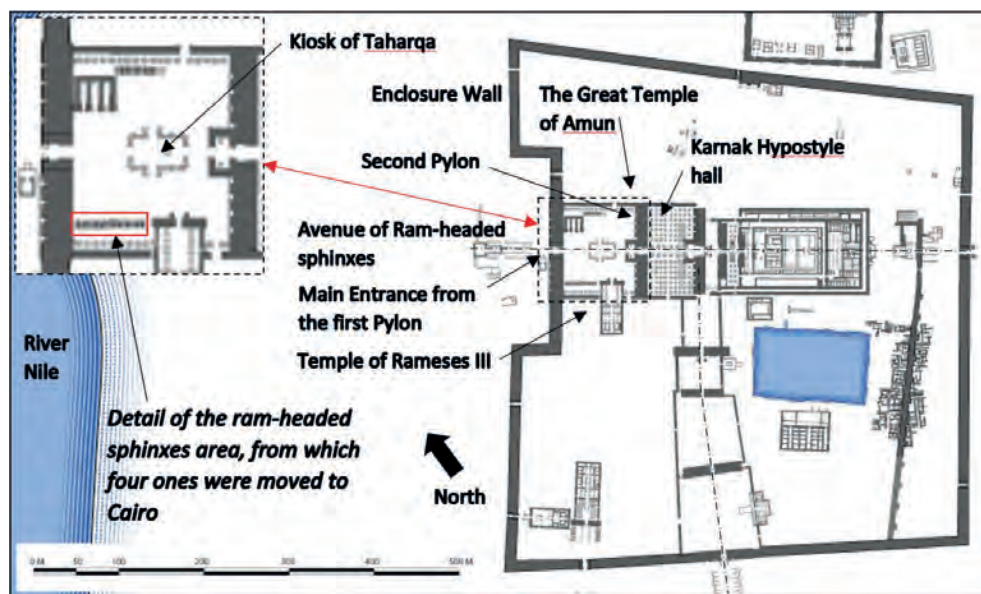


Fig. 1: Map of the Karnak Complex with the location of the ram-headed sphinxes.

Source: adapted from UCLA 2008

On 27.12.2019, the Egyptian Ministry of Tourism and Antiquities² announced the decision to relocate four ancient ram-headed sphinxes (out of sixty) from Karnak to Cairo in a press release on its official social media channel on Facebook (Ministry of Tourism and Antiquities 2019). According to Dr. Mustafa Al Shagir, the general director of Antiquities in Karnak, the four ram-headed sphinxes of Karnak will decorate Tahrir square in Cairo and will surround an obelisk, also to be relocated from Şan El-Hagar³. On 28 December 2019, only one day after the announcement, the Egypt Independent (2019) stated that the relocation process had already started upon instructions of the Egyptian Prime Minister, the Minister of Tourism and Antiquities, and the General Secretary of the Higher Council of Antiquities, as a phase “to complete Tahrir Square’s developmental work” (Marie

2020b)⁴. These sphinxes were moved from Luxor and arrived at the jammed square in Cairo on 08-09 January 2020.

The ram-headed sphinxes are located inside the inscribed UNESCO cultural World Heritage property *Ancient Thebes with its Necropolis* (Ref. 87) (see Fig.1). Dr. Mohamed Abdel-Maksoud, the former Secretary-General of the Supreme Council of Antiquities, stated that these ram-headed sphinxes represent the God Amun and date back to Amenhotep III

(1411 BC). The location of these ram-headed sphinxes dates back to the reign of King Taharqa (660 BC), who arranged them on both sides of his kiosk.

The Egyptians and archaeologists widely rejected this act⁵. Not only because of the historical value of the ancient ram-headed sphinxes in their original context that must not be altered but also because of environmental concerns, being relocated in a jammed square in the capital above a weighty fountain and two underground lines. The lime-

1 The author is known to World Heritage Watch.

2 The Ministry of State of Antiquities and the Ministry of Tourism of Egypt had merged as one Ministry of Tourism and Antiquities on 22 December 2019, only five days before this decision was adopted.

3 In September 2018, there were three obelisks transported from Tanis to the Grand Egyptian Museum in Giza (Egypt Today 2019). One of them stands now at the centre of the Tahrir square.

4 Some experts in urban planning believe that the drive behind this relocation is a desperate imitation attempt of Piazza del Popolo in Rome, which also contains an Egyptian obelisk and four lion statues in its centre. This relocation, perhaps, is also derived by an endeavour to erase the national and international symbolism of the Tahrir square in the last few years as the embodiment of the public will and power, and pursuit to mask this urban, vibrant space with a new imposed character, as critics say.

5 Unfortunately, this is considered a third of a chain of relocation attempts in 2019 that strip Luxor and other archaeological sites in Egypt from their archaeological and heritage artefacts — whether movable or immovable — to be parts of museum collections or be decorative elements in urban spaces. In April 2019, a finely-painted Ptolemaic tomb of Tutu and his wife (305-30 BC) was discovered. In three months, the decision was taken to relocate it to the museum of the New Administrative Capital of Egypt (Alyaum Alsäbe’ 2019b), even before sufficient documentation and proper scientific publication about this tomb could take place.

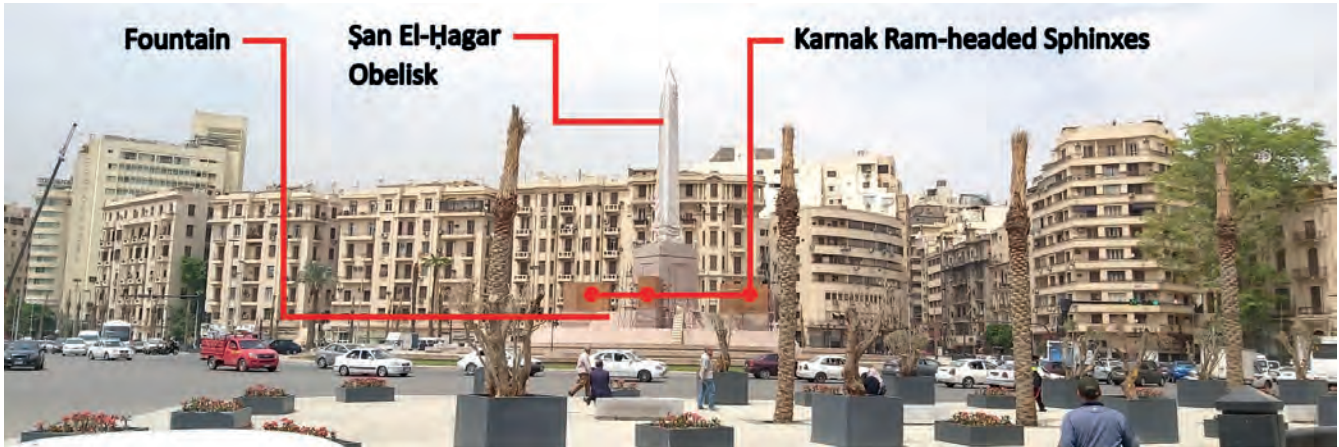


Fig. 2: Panoramic photograph of the Tahrir Square on 13 May 2020 shows three of four ram-headed after relocation sphinxes are yet covered in wooden crates until the yet unannounced inauguration. Photo animation by the author

stone sphinxes weigh five tonnes each, and the granite obelisk weighs four tonnes (see Fig. 2 and 2).



Fig. 3: Another image of the jammed Tahrir Square on 13 May 2020.

Photo animation by the author

Hence, their total load, excluding the weight of the fountain, is around twenty-four tonnes, and their heavy load is a huge risk to their stability above the two underground lines that run right below the square. Moreover, the humidity caused by the fountain will definitely threaten the limestone sphinxes. Hence, the relocation of the four ram-headed sphinxes of Karnak is against the Egyptian *Antiquities Protection Law 117/1983* and its Amendments, *Law 03/2010* and *Law 91/2018*, Articles 29, 42 (b), and 45 (C). Fig. 4 gives an idea of the primitive and subversive technique used to move the four ram-headed rams from their original location.

Therefore, the parliamentarians Ahmed Idris, Mohamed Abdel Ghany, and Nadia Henry officially inquired about the unneeded relocation in December 2019. The three also confirmed the refusal of the Luxor inhabitants about this decision. Mohamed Abo Saleh, the director of the Luxor Center for Studies, Dialogue and Development, as well as several experts, "urged the Antiquities Ministry to review its decision" before the relocation took place (Egypt Independent

2019). Furthermore, some "lawyers of the Egyptian Center filed a lawsuit before the Administrative Court on behalf of Dr. Monica Hanna, professor of Egyptology, Haitham Al Hariri, parliament member, Tarek AL Awadi, lawyer", and other lawyers against the Prime Minister and the Minister of Tourism and Antiquities to abstain from their decision to transfer the sphinxes⁶. The first session date was determined to be in early February 2020; however, this session was postponed.

Both Dr. Mostafa Waziry, the Secretary-General of the Higher Council of Antiquities, and Dr. Khaled Anany, the Minister of Tourism and Antiquities, disregarded the environmental impact of the relocation on the ancient sphinxes and justified it as legitimate to use those sphinxes to decorate an Egyptian land, while repeatedly hinting to the several Egyptian obelisks that are erected in many international capitals such as Washington DC, Paris, and Rome (Machemer 2020). Dr. Waziry also defended the transfer of the sphinxes as that they are not from the Processional Way that links Luxor and Karnak temples (Azzām 2019); hence, he implied, their original location is of minor importance. Dr. Anany stated as well that these relocated ram-headed sphinxes "are not part of the landmark ones placed at the front of the temple" (Essam El-Din 2019). Both officials indirectly associated the inferior value of these ram-headed sphinxes from an authoritative point of view despite national and international opposition.

In an international response, on the one hand, Sheikha Mai Bint Mohammed Al Khalifa, the Chairperson of the Board of the Arab Regional Centre for World Heritage (ARC-WH),

⁶ According to the Egyptian Centre for Economic and Social Rights (2019), the urgent lawsuit number is 15495 of judiciary year 74-urgent. There were several national and international competitions organized by the government to redesign Tahrir square. The Egyptian Engineering Authority of the Armed Forces organized the last competition in 2013. However, none of the winning proposals was officially adopted and applied, and neither of their ideas suggested moving ancient artefacts to the square as an option.



Fig. 4: Circulated photos of the relocation procedure of ram-headed sphinxes from Karnak on 8 January 2020. Source: www.facebook.com

sent an official letter to Egypt (in Arabic) on 31 December 2019, to note that the WH Centre must have been consulted for such an action. Furthermore, the letter clarifies that this project violates Article 7 of the 1964 *International Charter on the Conservation and Restoration of Monuments and Sites* (the Venice Charter). It also stated that the relocation should have been supported and justified by reports with an on-site heritage assessment.

The letter suggested arranging a consultation meeting between experts from the ARC-WH and Egypt to find an alternative solution if necessary. Nevertheless, the relocation started after a week from sending this letter on 08 January 2020. That was the only action taken by an international body concerning this case. The UNESCO WH Centre and its Advisory Bodies so far, on the other hand, arguably have taken a passive response to this action taken by Egypt as a State Party against its WH site.

While the people in Egyptian streets watch helplessly the relocation of the sphinxes to Tahrir square, another serious problem about the condition of the ones remaining in Karnak surfaced in May 2020. Information has emerged about the deteriorated state of the remaining twenty-nine ram-headed sphinxes in the south of the court of the Great Temple of Amun (see Fig. 5). Salah Al Māsekh, the supervisor of the restoration project, told Marie (2020a) that these limestone sphinxes have been put on red brick bases and debris and pasted with cement during a poor restoration project in the seventies of the last century.

Needless to say, the limestone is severely damaged because of the retaining humidity and salts. Despite that the current restoration project concerns constructing new stone bases and repairing the damaged parts, this situation raises several questions about the maintenance measures, priorities, and the conservation programme, if any, which the Ministry

of Tourism and Antiquities follows in order to protect WH sites in Egypt.

The situation could be defined and concluded in the following main four points:

1. This unnecessary relocation of highly-valued ancient immovable heritage component such as the four ram-headed sphinxes of Karnak causes a definite damage to the cultural World Heritage site *Ancient Thebes with*

its Necropolis (Ref. 87) in an explicit violation not only to Article 7 of the *Venice Charter* and the *UNESCO World Heritage Convention* (that Egypt ratified) but also the Egyptian *Antiquities Protection Law 117/1983* and its Amendments, *Law 03/2010* and *Law 91/2018*.



Fig. 5: Some of the damaged ram-headed sphinxes in the south of the court of the Great Temple of Amun at Karnak. Source: Marie 2020a

2. This act violates the integrity of the World Heritage site in Karnak and devaluates our legacy from the past, to only *decorate* the jammed Tahrir Square in Cairo. There is an imminent risk of irreversible impact on the relocated ram-headed sphinxes from traffic and vibration from two underground lines, and air pollution. Superimposing four ram-headed sphinxes, each weighing about five tonnes, from the Karnak complex in Luxor to surround an obelisk from Tanis in a vibrant urban setting that represents modern and contemporary Egypt puts the whole new space totally disproportional and out of context.
3. This authoritative decision was taken in secrecy and was implemented on 08 January 2020 in total absence of transparency and public discussion, without any proof of consulting either the UNESCO WH Centre or its Advisory Body ICOMOS, and without conducting feasibility studies and protection measures. This is considered not only

a challenge to the disregarded request of the Category 2 ARC-WH, but also a violation to Article 172 of the *Operational Guidelines*, which requires every State Party to notify the WH Committee “before making any decisions that would be difficult to reverse” (World Heritage Centre 2019, 49), and an apparent discount of the national lawsuit no. 15495 of judiciary year 74-urgent.

4. In the light of this action and the latest documentation of the serious state of the remained ram-headed sphinxes in Karnak, there is an urgent need from the UNESCO WH Centre and ICOMOS to immediately take action and investigate about the maintenance, protection measurements, priorities, and the conservation programme that Egypt as a State Party follows, not only in Karnak but also in other WH sites of Egypt.

References

- Alyaum Alsābe' a. “Naql Hammām Tell El-Herr Yutheir Azma: Amīn Al'Alā Lel'āthār Al'sbaq Ya'tared, Wal'āthār Aldarourāt Tubih Al-mahzourāt”. www.youm7.com. On 24.07.2019 <https://www.youm7.com/story/2019/7/24/4347412> (accessed on 29.12.2019).
- b. “Maqbarat Tutu Almuktashafa Besuhag Demn Sīnario Ard Muthaf Al'āsemah Al jldarya Aljadīda”. www.youm7.com. On 31.07.2019 <https://www.youm7.com/story/2019/7/31/4356795> (accessed on 29.12.2019).
- Azzām, Sahar. “Lam Yaraha Ahad men Qabl”. www.masrawy.com. On 30.12.2019 <https://www.masrawy.com/news/news-videos/details/2019/12/30/1697502/> (accessed on 20.01.2020).
- Egyptian Centre for Economic Social Rights. “A Lawsuit filed to Suspend Transferring some Rams Statues from Karnak Temple in Luxor to Decorate Tahrir Square in Cairo”. www.ecesr.org. On 31.12.2019 <https://ecesr.org/en/2019/12/31/a-lawsuit-filed-to-suspend-transferring-some-rams-statues-from-karnak-temple-in-luxor-to-decorate-tahrir-squar-in-cairo/> (accessed on 21.01.2020).
- Egypt Independent. “Egypt begins moving Luxor sphinxes to Tahrir Square”. www.egyptindependent.com. On 28.12.2019 <https://www.egyptindependent.com/egypt-begins-moving-luxor-sphinxes-to-tahrir-square/> (accessed on 29.12.2019).
- Egypt Today. “Parts of obelisks at San al-Hagar moved to Grand Egyptian Museum”. www.egypttoday.com. On 03.09.2018 <https://www.egypttoday.com/Article/4/57460/Parts-of-obelisks-at-San-al-Hagar-moved-to-Grand> (accessed on 29.12.2019).
- Essam El-Din, Gamal. “Egypt’s antiquities minister defends plans to move sphinxes, obelisk from Luxor to Tahrir Square”. www.english.ahram.org.eg. On 31.12.2019 <http://english.ahram.org.eg/NewsContent/1/64/358698/Egypt/Politics-/Egyptys-antiquities-minister-defends-plans-to-move.aspx?> (accessed on 20.01.2020).
- ICOMOS. “International Charter for the Conservation and Restoration of Monuments and Sites (The Venice Charter 1964)”. The 11nd International Congress of Architects and Technicians of Historic Monuments. Venice, 1964.
- Marie, Ahmed. “Mashrū' Aāلامي Jadīd Lihimāyat 29 Kabshan min Altalaf Bi-ma'bad Alkarnak: Al'a'lā Lil'āthār: Wajadna Athār Talaf 'alā Kol Alkibāsh Natījat Sū' Tarmīm Min Alsab'īnāt; Mmusharif Almashrū': Kānat Fi 'ālah Yurthā Laha Wa Khubara' Altarmīm Yuāsīlūn Al'amal. Video Wa 'uar”. www.youm7.com. On 14.05.2020a [youm7.com/story/2020/5/14/4774024?fbclid=IwAR3oZb8FtRVM1s1D7-KrRQOYhyoBCP0vjjwuRBo_2R_go80vNhAweuGSPeE](http://www.youm7.com/story/2020/5/14/4774024?fbclid=IwAR3oZb8FtRVM1s1D7-KrRQOYhyoBCP0vjjwuRBo_2R_go80vNhAweuGSPeE) (accessed 19.05.2020).
- Marie, Mustafa. “Karnak Temples' Rams transfer process launched”. www.egypttoday.com. On 08.01.2020b <https://www.egypttoday.com/Article/4/79472/Karnak-Temples-Rams-transfer-process-launched?fbclid=IwAR1O4D6K1VZ05jh8txxVmCik0fQRaCplY7o-HakrCOq1ZgG9t0pPGGTR-NE> (accessed on 20.01.2020).
- Machemer, Theresa. “Egypt Defies Archaeologists' Protests by Relocating Four Ancient Sphinxes”. www.smithsonianmag.com. On 11.05.2020 <https://www.smithsonianmag.com/smart-news/egypt-relocated-four-ancient-sphinxes-despite-archaeologist-protests-180974844/?fbclid=IwAR2K-7do6efO04k-nUYgPpMKjxQ2yZYI6Y8PqrlDbdrxEhL8tFIVXNG03Us> (accessed 18.05.2020).
- Ministry of Tourism and Antiquities. “Bayān”. www.facebook.com. On 27.12.2019 <https://www.facebook.com/moantiquities/> (accessed on 29.12.2019).
- Sullivan, Elaine. “Processional Routes and Festivals” in Digital Karnak, Los Angeles, 2008 <https://studylib.net/doc/8876696/processional-routes-and-festivals> (accessed December 29, 2019).
- The Arab Regional Centre for World Heritage. “A statement from the Arab Regional Centre for World Heritage”. www.arcwh.org. On 05.01.2020 <http://arcwh.org/news/a-statement-from-the-arab-regional-centre-for-world-heritage> (accessed on 20.01.2020).
- World Heritage Centre. Operational Guidelines for the Implementation of the World Heritage Convention. WHC.19/01. Paris: World Heritage Centre, 2019.

Hassan Abad Moshir's aqueduct in Mehriz, a Site of the Persian Qanat, Iran

Ghazal Nouri

Over 2,500 years ago, a massive drought ruled the Iranian plateau, North Africa, and the Middle East which lasted about 500 years. At a time when urbanization was growing, man began to confront the drought with a new masterpiece structure called the aqueduct. The Persian water system of Qanats is an astonishing symbol of the integration of Iranian art and engineering. Listed as a World Heritage Site in 2016 by UNESCO, the Persian Qanat system is one of the oldest inventions and the most economical method of groundwater extraction which has always been instrumental in the construction of settlements.

Due to the crucial role of water in the development of a country's economy on the one hand, and based on the drastic reduction of water resources on the other hand, the existence of aquatic supplies such as aqueducts that make human access to water possible without spending any energy is of particular value.

Iran is located in an arid and semi-arid area with limited water resources, which are not more than 0.36 percent of the world fresh water resources whereas about 1 percent of the world population lives in the country [1].

The UNESCO World Heritage Committee, as stated in Decision 42COM 7B.9, "Urges the State Party to include, as a matter of priority, sections on strategic risk management and sustainable tourism management in the integrated management system, with clear objectives related to the Outstanding Universal Value (OUV) of the property, notably its authenticity and integrity, and relevant monitoring indicators;

- Reiterates its recommendations to the State Party to:
 - a) Continue enriching the documentation centers with collected data related to each Qanat in the relevant regional offices of the Iranian Cultural Heritage, Handi-

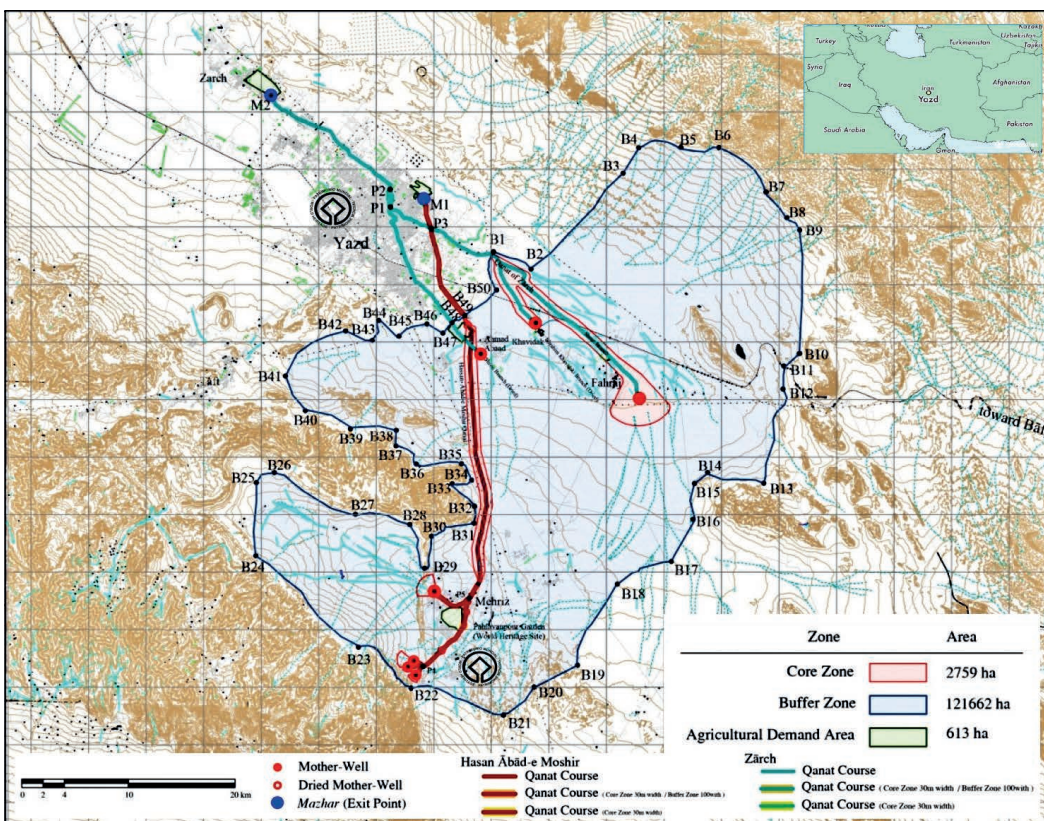


Fig. 1: The Qanat of Hassan Abad Moshir connects two other World Heritage Sites: The Persian Garden of Pahlavanpur and the Historic City of Yazd. Map: UNESCO [3]

crafts & Tourism Organization (ICHHTO), and ensure the availability of this data to members of the local communities and internationally,

- b) Extend the monitoring system to identify the responsible authority for each key indicator,
 - c) Complete the permanent marking of the boundaries of property components and buffer zones on the ground,
- Requests the State Party to provide an indication of the expected timeframe(s) for the completion of the above-mentioned actions;" [2]

Hassan Abad Moshir's Aqueduct in Mehriz

Registered in the World Heritage List in 2016 as the 20th Iranian work based on criteria (iii) and (iv), Hassan Abad Moshir's Qanat is located in the central Plateau of Iran,



Fig. 2-4

dating back to the Islamic period. This World Heritage site included a unique testimony to a cultural tradition and a prominent example in architecture and technology that represents a remarkable milestone in human history. The

amount of water in the aforementioned aqueduct depends heavily on the annual rainfall in Shirkouh as its flow rates reaches 200 liters per second in spring and the wet seasons, but declines in summer and autumn to 100 liters per second. Of note, the aqueduct passes through the Pahlavanpour WH site, a Persian Garden in Mehriz, and irrigates the trees.

Problems

- Washing carpets, clothes and cars in the path of the aqueduct by local citizens has led to an irrevocable environmental damage in buffer zones due to the use of detergents. Trees in the Pahlavanpur Garden WHS can be threatened by the contamination of the water. (Fig.2-4)
- One of the major problems with the exploitation of aqueducts would be sedimentation and the growth of weeds along the aqueduct route, which should be dredged and rehabilitated every few years. However, this is becoming less and less affordable due to the sanctions.
- Using modern systems that facilitate accessing to groundwater at any time can be the dark aspects of the emergence of new technology. It may be a significant reason that makes farmers negligent in maintaining the aqueduct and underestimated the water resources management which can cause the aqueduct to be drying up or destroyed.
- The abandonment of villages due to the migration of people to different cities is another point in the lack of exploitation and preservation of some of the aqueducts in several parts of Iran.
- Regrettably, there is no adequate and available comprehensive information about the Qanats to members of the local communities.
- Inadequate signs of the boundaries in English language for guiding international tourists (Fig.5-6).



Fig. 5



Fig. 6

- Most, if not all local citizens not only are unaware about the aqueduct's global record but also disregard the value of this mesmerizing invention. (Fig. 7)



We ask the UNESCO World Heritage Committee to consider the following comments and recommendations regarding the Persian Qanat which is one of the most important international methods for supplying water in arid and semi-arid areas.

Suggestions

In general, for all parts of Iran, following field surveys and reviewing various local solutions and experiences to prevent the destruction and drying up of the aqueduct as a crucial water resource, a series of essential actions are recommended:

- It would be better to extend the monitoring system in order to conserve the Qanats and their buffer zones by the authorities.
- It is highly recommended to use easily visible boundary markers in both Persian and English languages.
- Taking advantages of novel technologies, training labors or pitmen for maintaining and digging can help an area to be reconstructed, preserve Qanats for more years and extend their life.
- Integrate the management of this structure and assign a trustee by the government, adopt effective legislation, increase the annual allocation of funds for the maintenance of the Qanats, and grant loans with easy repayment conditions for the restoration or dredging canals.

- Concentrate all the affairs and payments of funds to create, restore and other operations of the Qanats in one organization.
- Changing the attitude of government and citizens towards Qanats by holding some exhibitions and showing videos about its functional structure is vitally needed.
- Holding academic workshops for local people to enhance their knowledge about the world heritage as a favorable way to decrease damages which are caused by people's neglect.
- Implementing an urban and rural sanitation system, filtering wastewater, and controlling water pollution of Qanats from agricultural pesticides and other chemicals.
- Prohibit drilling deep and half deep wells in the buffer zone.
- Install devices and vent discharge control in the Qanats to store water.
- Close all the pores of the water seams that have the potential for leakage and exploitation of the wells in accordance with the water balance in the region.
- Distribute a proper amount of water, encourage farmers to improve methods of irrigation and change the style of cultivation to grow crops in accordance with local water conditions ensuring sufficient water supply for the Qanats.
- Last but not least, applying mechanized, technical, and engineering methods in the program of rehabilitation and restoration of the aqueduct through new technologies is one of the other essential strategies for improving the performance of the aqueduct.

All things considered, although some organizations are in charge of preserving this construction, protecting the Qanats is the responsibility not only of the aforementioned organization. UNESCO should push the Cultural Heritage Agencies, the Environmental Agencies and even urban and provincial officials to enter the area to seriously protect the aqueducts.

Without doubt, current conditions highlight the fact that citizenship not only should not give up their responsibilities, but also should play a vital role in preserving their valuable heritage. It comes as no surprise that this principle would be achieved by boosting the knowledge of people about the importance of their heritage sites.

References

- [1] Seyed Hamed Alemohammad, Shervan Gharari, Qanat: An Ancient Invention for Water Management in Iran, Water History Conference, The Netherlands, 2010
- [2] <https://whc.unesco.org/en/decisions/7238/>
- [3] https://whc.unesco.org/en/list/1506/multiple=1&unique_number=2096

Concerns for the Management of the Historic Ensemble of the Potala Palace, Lhasa

International Campaign for Tibet



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).

Under the requirements of the World Heritage Convention, state parties are required to submit reports on the 'state of conservation' of the property when requested in a decision issued by the World Heritage Committee. At the 42nd session of the UNESCO World Heritage Committee (WHC) in June-July 2018, the Committee issued a Decision (42 COM 7B.2) requesting an updated report on the state of conservation for the Historic Ensemble of the Potala Palace property. The report was to be submitted by 1 December 2019 and is scheduled for discussion at the WHC 44th Session in 2020 in Fuzhou China, now postponed due to the Covid-19 pandemic.

Summary report by China late, superficial and ignoring UNESCO requests

Following presentations made to UNESCO about the absence of public reporting by the Chinese authorities, a two-page executive summary of China's 'state of conservation' report¹ has been published online as at 28 January 2020, past the submission deadline of December 2019. It is notable that the complete report has not been made available.

China's 2019 state of conservation report was required to directly respond to five specific requests issued in the WHC 2018 Decision.² The first two requests ask for a clear map of the property's buffer zone (consistent with the originally inscribed boundaries), and the conservation plan for the three component areas. The request for clear buffer zones has been outstanding since 2003, while the conservation

plans have been outstanding since 2007; the state party has in the past either excluded a detailed response or indicated that details would be forthcoming.

Both requests are basic, clarifying and integral requirements necessary to demonstrate that clear boundaries and plans exist to manage the conservation of the cultural heritage property.

The remaining three requests relate to the February 2018 fire inside the Jokhang Temple and a recent plan to construct a television tower inside the property, all of which require a timely response. All requests indicate a genuine concern for the management of the property and a desire to enforce proper checks, so that previous instances (in 2014) of unapproved development, mismanagement and retrospective heritage impact assessments are not repeated.³

The key takeaway messages from the submitted summary of the conversation report by the Chinese authorities are:

- China maintains that the Jokhang temple in February 2018 did not threaten the safety or outstanding universal value of the Statue of the Shakyamuni Buddha. No further details were provided on damage to the golden roof, ceiling and other statues in the vicinity.
- The World Heritage Centre and its advisory body carried out a Joint Reactive Monitoring mission to the property on 8-15 April 2019. No details of the visit were provided.
- The conservation plan for the three components of the historical ensemble of the Potala Palace has been compiled and is undergoing expert examination. Sadly, as consistently stated since at 2007, "They [the conservation plans] will be submitted to the World Heritage Committee for consultation in the near future".⁴
- China did not respond to the request for clarification of the buffer zones.

1 UNESCO, 'Summary of the State of conservation report by the State Party', <https://whc.unesco.org/document/180372>.

2 UNESCO, '42COM 7B.2 - Historic Ensemble of the Potala Palace, Lhasa (China) (C 707ter)' <https://whc.unesco.org/en/decisions/7231>.

3 UNESCO, 2016, 'Historical Ensemble of the Potala Palace, Lhasa', <https://whc.unesco.org/en/soc/3406>.

4 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.

Fig. 1: Requests made in Decisions between 2003 and 2018⁵

	2018	2016	2014	2013	2011	2009	2007	2005	2004	2003
Decision no.	42 COM 7B.2	40 COM 7B.31	38 COM 7B.10	37 COM 7B.103	35 COM 7B.65	33 COM 8B.47	31 COM 8B.58	29 COM 7B.50	28 COM 15B.55	27 COM 7B.45
Map of buffer zones										
Conservation plans										
Television tower construction										
Jokhang Temple fire details & re-active monitoring mission										

- China argues the TV tower on Chakpori Hill was established in March 1985. As the structure predates the heritage inscription, the Chinese state suggests that it will not undergo a heritage impact assessment.

China's lack of commitment to a detailed and transparent reporting also reflects an indifference to the value of its reports for Tibetan communities whose cultural identity is deeply attached to the remaining cultural artefacts of ancient Tibetan life. The lack of transparency and commitment to the reporting duties outlined by the World Heritage Committee is of particular concern given the fire that engulfed a part of Tibet's holiest temple, the Jokhang Temple in February 2018. The 2018 State Party Report noted that the ventilating chamber on the second floor of the back hall of the Main Hall caught fire and burned an area of about 50 square metres, which reportedly only caused minor damage to the golden ceiling above the ventilating chamber.⁶ However, there were concerns about the extent of the damage and fears that the authorities are engaged in inappropriate repair work to the historic structure.⁷ Moreover, as the Jokhang Temple is one of Tibet's holiest temples, the lack of detailed images and description in the 2018 State Report creates distrust and raises genuine concerns of mismanagement.

The Jokhang fire and China's unwillingness to meet reporting requirements that facilitate transparency exacerbate

existing concerns related to mismanagement of the property, such as the exclusion of Tibetan residents and the museumification of Tibetan cultural identity for the benefit of tourists and Chinese tourism businesses. For example, previous conservation plans in the Old Town of Lhasa area have destroyed rather than preserved ancient architecture. The 'Lhasa Development Plan 1980-2000' and the 'Barkhor Conservation Plan 1992' resulted in historic traditional buildings being demolished and replaced with 3-4 storey 'neo-Tibetan' cement houses. The estimated 700 historic-traditional buildings existing in 1948 declined to 300 in 1995, and reached 50 by 2005.⁸

Serious concerns also exist over the level of Tibetan consultation and participation in the conservation process. The "1992 Barkhor Conservation Plan" was developed by the central Chinese government, and only nominally consulted Tibetan experts and Lhasa.⁹ Studies by an architect and heritage advisor between 1994 and 2005 also found most heritage conservation work on major heritage properties (e.g. Potala Palace, Jokhang temple, Norbulingka and Sakya Monastery) were carried out by non-Tibetans.¹⁰

New developments at Jokhang Temple cause for concern

According to a report by Beijing-based Tibetan writer Wo-esser on Radio Free Asia on May 5, 2020,¹¹ Chinese authorities have begun constructing two pavilions at the Jokhang

5 UNESCO, 2009, 'Historical Ensemble of the Potala Palace, Lhasa', <https://whc.unesco.org/en/list/707/documents/>.

6 See 'Appendix: Report on the Local Fire Accident Happening in Jokhang Monastery, Lhasa presented by the People's Government of Tibet Autonomous Region' in State Administration of Cultural Heritage, PRC, November 2017, 'World Heritage Historic Ensemble of the Potala Palace, Lhasa: State of Conversation 2017', <https://whc.unesco.org/document/165238>.

7 International Campaign for Tibet, 12 March 2018, 'New fears for historic structure of Jokhang temple after major fire, as China covers up extent of damage', <https://savetibet.org/new-fears-for-historic-structure-of-jokhang-temple-after-major-fire-as-china-covers-up-extent-of-damage/>.

8 Amund Sinding-Larsen (2012), 'Lhasa community, world heritage and human rights', *International Journal of Heritage Studies*, page 301.

9 Ibid., Amund Sinding-Larsen (2012).

10 Ibid., Amund Sinding-Larsen (2012), 'Lhasa community, world heritage and human rights', page 303.

11 Radio Free Asia, May 5, 2020, <https://www.rfa.org/mandarin/pinglun/weise/ws-05052020104015.html>.

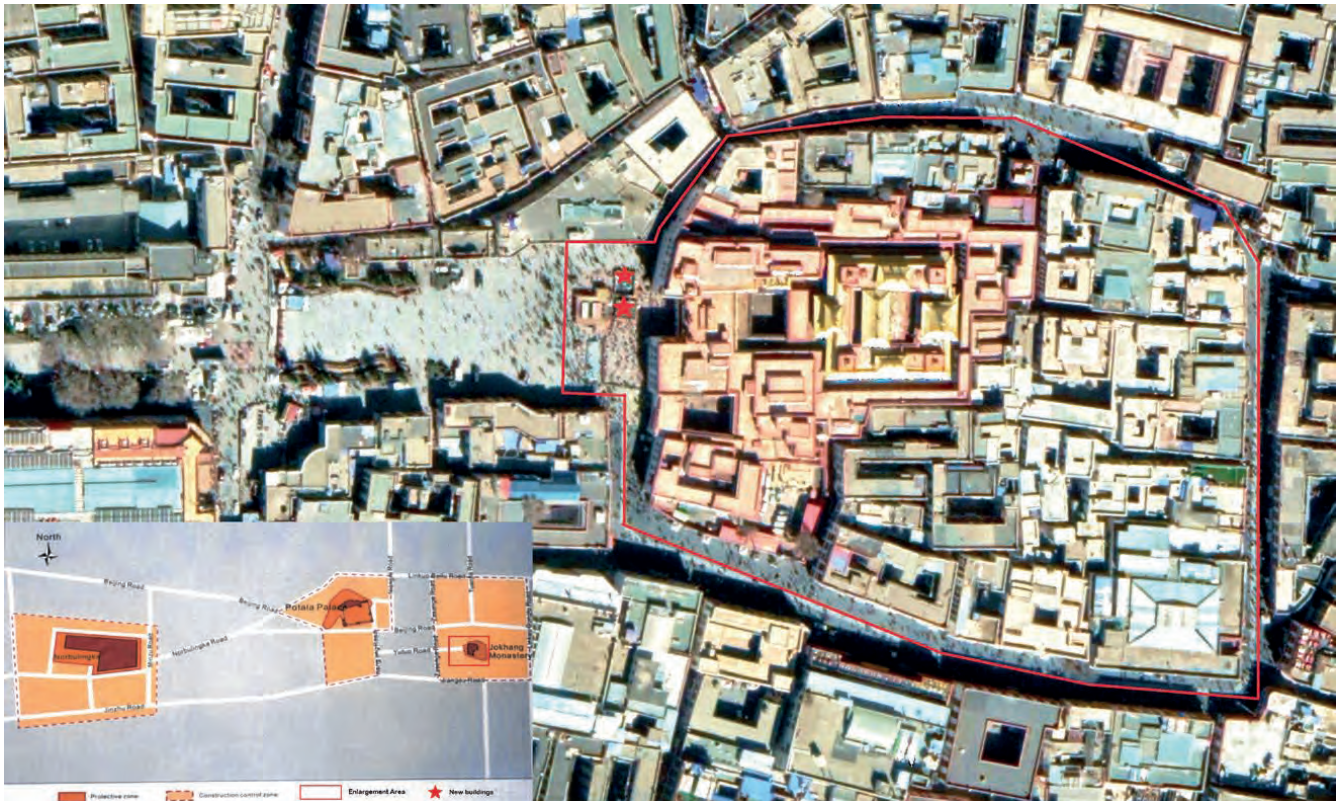


Fig. 2: Location of the two pavilions constructed in front of the Jokhang Temple.

Map: Google Earth / UNESCO / WHW

Temple. The pavilions appear to adhere to a Chinese architectural style incompatible with traditional Tibetan architecture.

Chinese state media, when reporting on May 7, 2020 about an investment to be made into the “protection” of the site,¹² did not detail any information about the scope and extent of construction to be undertaken. The relevant report merely stated the investment “mainly focuses on upgrading the security, power, and fire-fighting facilities of the temple to protect the historical artifacts and the heritage site overall.” It is unclear whether the current construction of the two structures is part of the announced investment.

Although the Jokhang Temple is currently inaccessible to the public, the construction became visible when the circumambulation path around the temple was opened to public on April 28 after its closure due to the coronavirus outbreak.

The International Campaign for Tibet has requested the UNESCO World Heritage Center in Paris to make available details about the construction site and whether it affects the UNESCO-protected “Outstanding Universal Value” of the Jokhang Temple.¹³

¹² Xinhua, May 7, 2020, ‘Tibet to invest 40 mln yuan to protect world heritage temple’, http://www.xinhuanet.com/english/2020-05/07/c_139038504.htm.

¹³ International Campaign for Tibet, May 7, 2020, ‘Concerns about construction at UNESCO-protected Jokhang Temple in Tibet’, <https://savetibet.org/concerns-about-construction-at-unesco-protected-jokhang-temple-in-tibet/>.

The International Campaign for Tibet further urged the center to protect such significant Tibetan cultural heritage sites as the Jokhang Temple from unacceptable interference from Chinese authorities, particularly in view of the state media reports announcing investment into the site.

Pavilion over historical pillar

Located within the 1,300-year-old Jokhang Temple compound is the stone pillar on which is inscribed the imperial Sino-Tibetan Treaty of 821/23 A.D. that delineated the frontiers of the Tibetan Empire and Tang Dynasty China. According to eyewitness accounts and photographic evidence, one of the new pavilions is being built over the stone pillar.

A Tibetan from Lhasa now living in exile told the International Campaign for Tibet: “I grew up at a place near the Jokhang and spent my childhood visiting it regularly. Looking at the photos of the pavilions, they seem to be aimed to be tourist attractions and to divert the attention of the international visitors away from the content of the Sino-Tibetan treaty pillar. Given that such pavilions are part of ancient Chinese culture, having one of these over the treaty pillar could be intent to create an impression to the visitors about Tibet being a part of China since ancient times.”



Fig. 3-6: Images of the Chinese-style pavilions being constructed in front of the Jokhang Temple in Lhasa, Tibet.

Photos: Woeser via RFA Chinese website.

Recommendations

- Given another deflection of the request for a conservation plan and map of the inscribed area (with protected and buffer zones), the Committee should invoke more serious measures to uphold the World Heritage Convention, such as consider inscribing the site on the List of World Heritage in Danger. As per paragraph 179 of the Operational Guidelines¹⁴, the lack of conservation policy and threatening effects of regional planning projects, as well as significant loss of historical authenticity are at least three criteria that the property satisfies for inscription on the List of World Heritage in Danger.
- The International Campaign for Tibet welcomes news of the Reactive Monitoring Mission to the property on 8-15 April. To allay the genuine concerns of Tibetans and those interested in the preservation of the Jokhang temple, we recommend that details of the fire damage, restoration plan and conservation plan for the property be made public, with photographs and maps. There are reason for concern that a report has not been made public as of yet.
- 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 the conservation reports on the property 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.
- The International Campaign for Tibet requests the UNESCO World Heritage Center to make available details about the recently revealed construction site at the Jokhang Temple and whether it affects the UNESCO-protected "Outstanding Universal Value" of the Jokhang Temple.
- The International Campaign for Tibet further urges the Centre to protect such significant Tibetan cultural heritage sites as the Jokhang Temple from unacceptable interference from Chinese authorities, particularly in view of the state media reports announcing investment into the site. Plans related to the announced investment into the Jokhang Temple need to be made available. It must be safeguarded that these plans are in conformity with UNESCO requirements.

¹⁴ World Heritage Centre, July 2012, 'Operational Guidelines for the Implementation of the World Heritage Convention', United Nations Educational and Cultural Organisation, <https://whc.unesco.org/archive/opguide12-en.pdf>, paragraph 177-179.

Hampi: Need for an Inclusive and Integrated Approach to Heritage Conservation-Management

Krupa Rajangam and Equations



The World Heritage Site (WHS) of Hampi is a lived landscape. The site is a dynamic, riverine, agricultural, socio-cultural ecological *production landscape*. **The key threat to the site's Outstanding Universal Value (OUV) is the current extremely limited definition and understanding of the site. As a consequence of this, the State Party's approach to management is bereft of community participation.**

In spite of repeated calls to the contrary, including in the site's Integrated Management Plan (IMP), the site remains notified as 'Group of Monuments', a label that is far removed from its everyday realities. The World Heritage Committee (WHC) is aware of the paradox inherent in its mission, namely, trying to conserve certain unique locations for 'all of mankind'. In other words, balancing the unique value of a location with its universal value. This is not easily done. However, successive WH Committees have shown themselves equal to the task of adapting to critiques and correcting past mis-steps.

Within the 4 categories currently available (cultural, natural, mixed, and cultural landscape) Hampi WHS, at the very least, deserves to be recognised as a mixed site. The site existed long before and after its Vijayanagara period of occupation. The region has rich biodiversity and is of geological, prehistoric, cultural, mythological and ecological signifi-

cance. Currently, besides settlements, villages, agricultural fields, orchards and water systems, its 236 sq.km boundary also encompasses parts of a sanctuary for the endangered sloth bear, while sections of the River Tungabhadra that flows through the core zone are inscribed as a preserve for two species of river otters. Both the sloth bear and the river otters are listed as 'Vulnerable' in the IUCN Red List.

This complex landscape speaks to both living culture and ecology. For instance, the living agricultural system and living water system is linked with the living cycle of festivals and rituals in different parts of the site. They broadly culminate in the *Virupaksha Jathre*, the annual festival of the region's tutelary deity (the temple sits in the heart of the core zone). It is clear that such celebrations and rituals have been deliberately scheduled keeping in mind agricultural production and seasonal cycles and speak to the deep embedding of the site's residents with the landscape (Rajangam, 2018).

The region is home to numerous proto- and pre-historic sites, some of which are to be found within the WH boundary, while the justly famous rocks of Hampi are part of a craton belt (stable continental lithosphere). Therefore, though the cultural landscape category advocated by Hampi's IMP is useful (Thakur 2007a, b) it would not serve the purpose.

As often, the category has led to an imagination of culture as an 'unchanging tradition that has happened' rather than a culture that is recognised as dynamic, living, and adapting.



Fig. 1: Ruins of the Vijayanagara period stone bridge across River Tungabhadra with Hampi region's rocky outcrops forming a spectacular background - such popular images of the site overpower the 30-odd living settlements, fields, orchards, markets, and shrines located within the WH boundary. The latter typically do not feature in any popular pictures or promotional materials related to the site.

Photo: Krupa Rajangam



Fig. 2: Pilgrims congregate at Virupaksha Temple for the annual 9-day festival (Jatre). The protected monuments are part of religious activities which have continued for as long as the monuments have existed.

Photo: Krupa Rajangam

Impractical labelling and categorisation

Managing Hampi as a static landscape that belongs exclusively to the past (the medieval Vijayanagara period) and therefore only meant for viewing will not work and has not worked. When the Hampi World Heritage Area Management Authority (HWHAMA) was notified by Indian government authorities in 2003, its remit was only to protect a 'Group of Monuments' and not the lived landscape in a holistic, inclusive manner. In spite of repeated attempts to draw attention to the discrepancies between the reality of the site and the limited nature of HWAHAMA's mandate, little effort has been made to recognise and reconcile the differences.

Currently protected heritage as 'dead' monuments are few and far in-between in comparison with the rest of the site. However, on the current master plan, any material heritage structure has uniformly been labelled 'monument', including 'living' places or sites of worship. Such uniform labelling is impractical to manage or plan for. Detailed categorisation of the site's heritage beyond just the grand monumental, such as, cultural landscape precincts, living heritage monuments, buried remains, historic canal networks, farming fields and orchards could be introduced within the existing framework and individual guidelines prepared. Various studies also show that even the few 'dead' monuments are linked to other structures and are not isolated onto themselves. For e.g. Octagonal Pavilion is part of the living water system that feeds the Royal Enclosure (when it rains, water still drains away by itself).

There are also discrepancies between current recommendations of the WH Committee and the applicable legal framework. While the Committee has done away with the three zones, namely, core, buffer, and peripheral in favour of a core and buffer, legally on paper, these three zones remain in force at Hampi WHS. They cannot be repealed without an amendment to the HWHAMA Act, and this continues to create confusion on ground. This is further compounded as the territories of various administrative and legal entities that work within the WH boundary, at federal, regional, and local scales, do not overlap. HWHAMA was meant to be the nodal agency, a conduit for various departments to communicate with each other. However, the HWHAMA is yet to have a full-time Chairperson who is available to co-ordinate with various departments. This has hugely limited its efficiency resulting in the agency becoming a major bottleneck for site management (Rajangam, 2019, forthcoming).

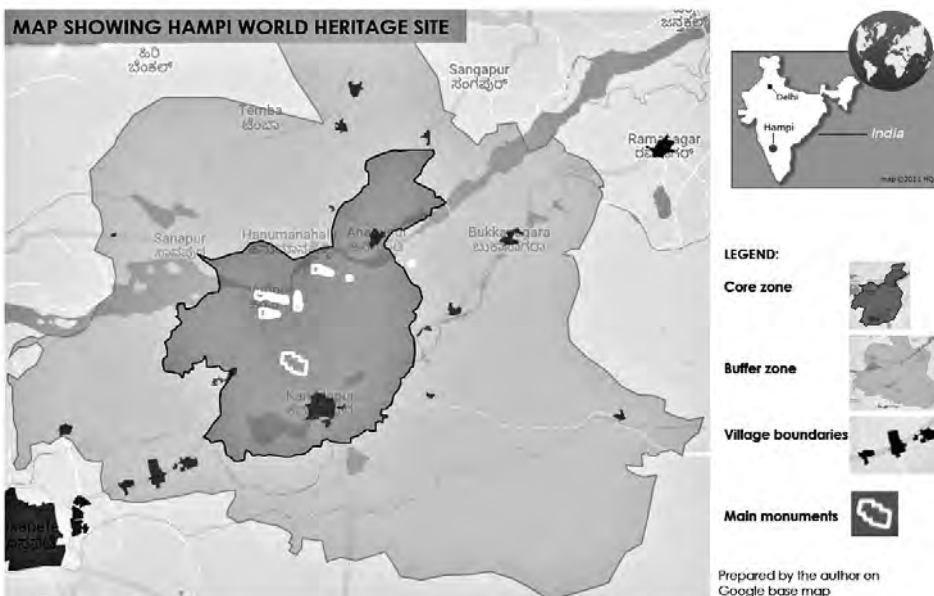


Fig. 3: Zoning of Hampi World Heritage Site.

Map: Krupa Rajangam

Impact on communities and conflicts over management of the site

Another glaring departure from the WH recommendations has been the lack of direct and meaningful community participation in decisions regarding the WH site. The WHC has recognized that areas demarcated in isolation from local or resident communities risk failure.

The complexity of the Hampi landscape demands sensitivity in handling the conservation-management and protection of the site's authenticity

and integrity. It requires an empathetic approach that allows local communities to participate in the decision making, planning and equitable benefit sharing. However, what is seen on the ground is an exclusionary model of conservation-management which has ended in spatio-temporal and material alienation of the local communities (Rajangam, 2019), leading to severe conflicts and everyday contestations around site management.



Fig. 4: Aftermath of demolitions in the village of Virupapura in March 2020.
Photo: Krupa Rajangam

HWHAMA, as the nodal agency for management of the site, is constituted as an executive agency, with no *taluk* (sub-district) or village level representative. This means that there is no one within the authority to raise issues, concerns and objections on behalf of the site's diverse resident communities. The 60,000 odd residents of the site spread across 29 villages are nowhere to be seen in the larger framework of heritage management in the Hampi region. Instead, residents of Hampi WHS constantly live under fear of evictions and displacement.

In most cases, the local communities have received unpleasant surprises, in violation of their human rights, when ad-hoc changes have been demanded on ground or draconian restrictions have been imposed. The unprecedented violent demolition of the Hampi bazaar in 2011, followed by further covert demolitions in 2012, 2014, 2015, 2016, have left many families homeless (Campbell, 2015 a and b; Rajangam, forthcoming).

Most recently, hotels, restaurants and tourist homes built in 1999-2000 on the island of Virupapura Gaddi, were demolished by the Authority in March, 2020, leaving many bereft of tourism income (The Hindu, 2020). The notification for demolition was justified on the basis that Virupapura Gaddi has been included in the 'core zone' of the Hampi Master Plan 2021 (which should have been revised by now and draft opened for suggestions) and commercial activities are not permissible. Meanwhile, local authorities have

sanctioned the construction of a forest department guest house on the island.

There has been little concern for the economic dependencies of the people of Virupapura Gaddi on the WHS. There has also not been any proactive measures taken to ensure communities benefit equitably from site development. The most recent order for demolition came just weeks before the national lockdown to control the global Covid-19 pandemic. While most households were demolished in March 1st week (see Fig. 4) one was demolished some weeks later - the day after the national lockdown commenced. The displaced communities have had a terrifying time coping with the double blow of a dwindling income from tourism because of Covid-19 and the order for demolition of their properties in the midst of a strict lockdown..

The overall management of Hampi also has seen severe conflicts. The Constitution of India envisions a decentralized governance system, according to which each village in Hampi has an elected body of members (called *Panchayat*) to govern their area. The *Panchayats* are given vast powers for management of their areas, which not only include important subjects such as health, sanitation, and education, but also give extensive regulatory powers, including permissions for building construction, running of hotels, licensing of shops and several other powers regarding tourism management and development.

However, HWHAMA has assumed supreme decision-making power in all planning aspects within the 'Local Planning Area' in direct conflict with the powers accorded to the *Panchayat*. The *Panchayats* are unable to exercise their authority to give permissions for any new constructions or repair works, make and execute plans for public works, or give any commercial licenses. Instead, all petitions are mandatorily forwarded from the *Panchayat* to the HWHAMA, where they are pending for a long time and later not responded to (Rajangam, 2019; EQUATIONS, 2020). This continuing stand-off has had severe negative impacts on the local communities, as all aspects of everyday living that are not directly linked to monument conservation have to be constantly negotiated and fought for.

The IMP prepared for Hampi also raised this conflict as a site management issue (Thakur, 2007). While the IMP was developed after consultations and endorsed by the WHC, so far, the elements of inclusive conservation that were envisaged in this plan have not been actualized. Rather, HWHAMA has come up with several plans, prepared with only tokenistic consultation. For example, in the most recent planning process in 2018, HWHAMA issued a notification calling for public comments on their proposal to revise the Hampi Local Planning Area Master Plan for the 29 villages. However, at that time, the current Master Plan

was available only in English, a language that neither the *Panchayat* members nor the local residents can understand easily. After extensive capacity building workshops by civil society organizations, the community understood the details and sent over 800 letters of objections to the current plan and proposal for a revised plan, but did not receive responses to this.

Due to the exclusionary manner in which Hampi has been managed, it has become a site of heavy litigation. More than a hundred cases have been filed in the High Court and Supreme Court, challenging various orders made by HWHAMA. This is the manifestation of the discontent among the people of Hampi about the management of this region. An inclusive and participatory approach to planning and management in Hampi is of utmost importance to preserve the Universal Outstanding Value. The communities, also being custodians of the heritage, are the lifeline of any successful management of heritage.

Recommendations

We call on the World Heritage Committee to consider the following actions:

1. Recommend to the State Party to submit the property under additional criteria in view of its complex ecosystem and human-nature interaction, important biodiversity and geological, prehistoric, cultural, mythological and ecological significance which qualify it as a lived landscape.
2. Urge the State Party to introduce detailed categorisation of Hampi's diverse heritage, such as cultural landscape precincts, living heritage monuments, buried remains, canal networks, farming (fields), farming (orchards), within the existing framework, and prepare individual guidelines.
3. Express urgent concern regarding the failure to include local communities' participation in planning and management of Hampi WHS, in line with the 5th C of the Convention;
4. Urge State Party to proactively engage with the local communities of Hampi WHS to evolve an effective conservation-management system that includes a shared understanding of the property and ensures equitable benefits to local communities.¹
5. Urge the State Party to rationalize the various boundaries under regional law (and amend the HWHAMA Act as required), for instance peripheral zone, in line with boundaries recognized by the World Heritage Committee, for ease of operation.

¹ One way to do this is to develop Individual Village Level Plans which have the participation of knowledgeable residents and these become a part of the Panchayats' planning system. For this, it is also important that capacities of Panchayats are built and there is an established two way communication between HWHAMA and the Panchayats.



Fig. 5: Protest of villagers. One of the placard reads "Down with the fallacious ways of ASI and HWHAMA". Photo: Equations

6. Urge State Party to reconcile differences between various legislative frameworks that operate within the WHS boundary including the laws for local governance in Hampi.²
7. Urge State Party to appoint a full-time chairperson for the HWHAMA.

References

- Campbell M (2015a) Hampi Bazaar Demolition I. *Economic and Political Weekly* L (25) Jun 20. Available at: <http://www.epw.in/print/reports-states/hampi-bazaar-demolitioni>. html (accessed 27 Jul 2015).
- Campbell M (2015b) Hampi Bazaar Demolition II. *Economic and Political Weekly* L (29) Jul 18. Available at: <http://www.epw.in/print/reports-states/hampi-bazaar-demolitionii>. html. (accessed 27 Jul 2015).
- EQUATIONS (2020) Parastatal Bodies in Tourism: Case Study of UNESCO Heritage Sites of Hampi and Mamallapuram.
- Rajangam K (2018) Constructing Heritage, Shaping Tourism: festivals and local heritage governance at Hampi WHS, in C.Palmer and J.Tivers (eds) *Creating Heritage for Tourism* (pp.50-63), Oxon and NY: Routledge.
- Rajangam K (2019) A bureaucracy of care in managing Hampi World Heritage Site, *Journal of Social Archaeology*, DOI: 10.1177/1469605319893532.
- Rajangam, K (forthcoming). Rethinking UNESCO World Heritage conservation management: Negotiations with everyday heritage governance at Hampi, India. Doctoral Dissertation. National Institute of Advanced Studies, Bangalore: Manipal Academy of Higher Education.
- Reporter, S (2020, March 3). 19 resorts demolished near Hampi. Retrieved May 3, 2020, from <https://www.thehindu.com/news/national/karnataka/19-resorts-demolished-near-hampi/article30975490.ece>
- Thakur N (2007a) Hampi World Heritage site: Monuments, Site or Cultural Landscape? *Journal of Landscape Architecture* 4 (4): 31–37.
- Thakur N (2007b) Integrated Management Plan (IMP) for Hampi World Heritage Site, Final Plan–Draft, Jul 2007. Report, SPA, New Delhi.

² Legal mechanisms concerning protected heritage include a federal act and two state level acts whose boundaries overlap in some locations and are non-contiguous elsewhere. For instance, the protected zones around the 56 monuments under the Archaeological Survey of India's (ASI) guardianship are defined as concentric circles, literally offset lines set off from the monument boundary. These should be rationalised along administrative divisions, such as, survey numbers, revenue borders and so on (as far as possible) and then overlaid on the master plan map. This is because the circles drawn on paper might in reality cut through half of someone's land which is illogical from a management perspective for both the owner and HWHAMA. For e.g. currently half of Kaddirampura village is in core zone and half in buffer zone. Similarly, parts of certain properties in Kamalapura village lie in the core zone and part in the buffer zone.

Annex

The Authors

Laxman Adhikari

Laxman Adhikari is a resident of Khumjung Solukhumbu, a village along the trails to the Everest Base camp. He graduated from Khumjung Secondary School which was established by Sir Edmund Hillary in 1961. After receiving intermediate level from Bagmati College, he came back to the village and worked as technical staff, and later as a manager, at the pyramid international laboratory for 10 years. He was one of the many locals who was not satisfied with the political phenomena in his community due to lack of motivation, education and dedication. He dreamed about changes in the fields of education, social health, conservation and culture. He decided to be a political candidate and got elected with huge vote difference in the 2016 election. He is now the chairperson of ward no 4 of the Khumbu Pasanglhamu rural municipality and working seriously to make his dream come true.

Contact facebook: *Lax Man*



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

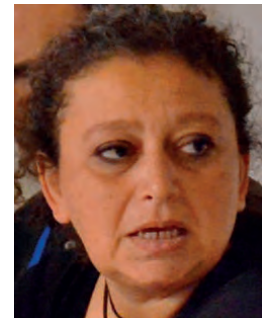
nature and ensuring the well-being of future generations. Agent Green focuses its activity on environment issues that can permanently damage biodiversity: the destruction of intact ecosystems, genetically modified organisms, climate change and poisoning the environmental factors (water, air and soil). 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.

Contact: *office@agentgreen.org*

May al-Ibrashy

May al-Ibrashy is founder and chair of the Built Environment Collective, an Egyptian NGO, and director of Megawra, its commercial arm. She is coordinator of Athar Lina, a participatory initiative integrating conservation and community development based in Historic Cairo. In addition to her practical work as an architect with close to 25 years of experience in architectural conservation and documentation, she is adjunct lecturer of architecture at the American University in Cairo. She holds a BSc in architecture from Ain Shams University and a PhD and MA in art, architecture and archaeology from the School of Oriental and African Studies, the University of London.

Contact: *mibrashi@hotmail.com*



Emilija Apostolova Chalovska

Emilija Apostolova Chalovska, MSci (Skopje, 1982) is an architect, working as an assistant-researcher of architecture at the University "Ss. Cyril and Methodius", Skopje, Republic of Macedonia. The foremost expert for cultural heritage at Citizen Initiative Ohrid SOS, she finished her Masters in Conservation of Architectural Heritage at the Superior Technical School of Architecture, Polytechnic University of Valencia (Spain) in 2014 and is currently working on her PhD thesis at the same university. In addition to her research work, since 2015 she has participated in teaching activities at the Faculty of Architecture in Skopje in the area of Documentation, Conservation and Revitalization of Architectural Heritage. She is a member of ICOMOS and other professional organizations regarding cultural heritage, which constitutes her primary area of professional interest.

Contact: *apostolova_ema@yahoo.com*



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.

Contact: mohamedathman64@gmail.com

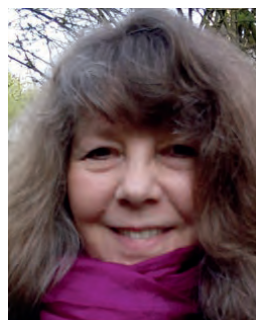
Noni Austin

Noni Austin is a staff attorney in the International Program of Earthjustice. Previously, she practiced environmental, planning and native title law at Herbert Smith Freehills in Sydney, Australia, and clerked for a judge of the Land and Environment Court of New South Wales, Australia. She earned a Masters of Environmental and Natural Resources Law at the University of Oregon, during which time she externed for the Western Environmental Law Center and Environmental Law Alliance Worldwide.

Contact: naustin@earthjustice.org



Fiona Campbell



Fiona Campbell is a teacher and an environmental campaigner. She set up a campaign page on Facebook called Zip Off. The aim of the campaign was to fight against the proposal to site zip wires at Thirlmere in the heart of the Lake District National Park. She writes articles on conservation and landscape and is a member of a group called Extinction Rebellion.

Contact: its_fiona2004@yahoo.co.uk

Juanjo Carmona

Juanjo Carmona has been a lawyer and environmental consultant since 1999. His path seems to be destined to cross with Doñana, and even more when he discovered that an ancestor – Antonio Machado Núñez – had written what can be considered the first ornithological guide of Doñana. In 1996 he started volunteering in Doñana through WWF Spain, so he lived through one of its blackest moments, the Aznalcóllar 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.

Contact: donana@wwf.es



Jon Derry

Jon Derry is a resident of the village of Thornthwaite, within the proposed Keswick and Borrowdale Showcase area and close to the site of the proposed Gondola Base Station. He is a self-employed Sales & Marketing Consultant.

Contact: jon.derry@outlook.com



Wiwik Dharmiasih

Wiwik Dharmiasih (35) is a lecturer at the Department of International Relations, Universitas Udayana in Bali, Indonesia.



Her research focuses on political geography, conflict transformation and community-based natural-resources management. She provided social and legal analysis for the World Heritage nomination of the Balinese irrigation system, *subak* (2010–2011) and was the Coordinator for Program and Planning at the Governing Assembly

for Bali's Cultural Heritage (2012). She was involved in the establishment of Forum *Pekaseh Catur Angga Batukau* and helped design the monitoring and evaluation system for management of the World Heritage property in Bali. She has actively supported community participation and youth involvement in the management of this property by initiating Project Kalpa and *subak* preservation with Yayasan Sawah Bali, an NGO based in Bali.

Contact: wiwikd@gmail.com

Sonja Dimoska

Sonja Dimoska is a graduate of Tourism and Catering at the St. Clement of Ohrid University; holds a degree in philosophy from



Ss. Cyril and Methodius University of Skopje; and additionally completed a Master of Business Administration at National Taiwan University. She currently works in marketing and, since 2015, has been a dedicated member of Ohrid SOS, a citizens' initiative devoted to the protection of the UNESCO Ohrid-Prespa region in the Republic of Macedonia.

Contact: sonja.ohridsos@gmail.com

Sukhgerel Dugersuren

Sukhgerel Dugersuren is the Chair of Oyu Tolgoi Watch, a Mongolian NGO monitoring compliance of Rio Tinto's copper-gold mine and other IFIs financed mines with international environmental and human rights standards. She is also Mongolia Coordinator of Rivers without Boundaries International Coalition (RwB). She is engaging with the multilateral development banks (MDBs) on human rights and development issues, assisting local communities demand remedy for violations of rights. As part of her human rights work, she engages with the UN mechanisms, international and national level advocacy, including work on a draft law for the protection of Human Rights Defenders in Mongolia. Sukhgerel has a degree from the Moscow State Institute of International Relations. The longest years of her previous job experience was with the USAID Mongolia program office.



Contact: dsukhgerel@gmail.com

Equations

EQUATIONS (Equitable Tourism Options) is a research, campaign and advocacy organization working on tourism. EQUATIONS envision forms of tourism which are non-exploitative, where decision making is democratized and access to and benefits of tourism are equitably distributed. EQUATIONS believes in the concept of public action as



elaborated by the famous economists John Dreze and Amartya Sen (1989). EQUATIONS has been a part of interventions and action research in Hampi for the last ten years. The interventions in Hampi have been to support communities to assert their rights in planning and development of tourism that comes to their doorstep. This contribution is based on interviews, conversations and observations with local communities as a part of the research on local governance in Hampi and support provided to those who were fighting legal battles in Hampi.

Contact: nayanau@equitabletourism.org

EuroNatur

EuroNatur is a charitable international 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.

Contact: info@euronatur.org



EXPEDITIO



EXPEDITIO Center for Sustainable Spatial Development is a non-governmental organization based in Kotor (Montenegro) whose mission is to encourage sustainable spatial development in Montenegro and SEE region through activity in the fields of sustainable architecture, cultural heritage, urban planning and through projects that encourage overall development of the civil society. EXPEDITIO was established in 1997, and it has implemented numerous projects and activities, through cross-disciplinary engagement and participative practices, addressing various issues of cultural heritage and landscape. A member of EXPEDITIO represented non-governmental organizations in the Council for the Management of Natural and Culturo-Historical Region of Kotor.

Contact: office@expeditio.org

Mamoun Fansa

Mamoun Fansa (1946) was born in Aleppo, Syria and moved to Germany in 1967. He studied art and design in Hanover, and Northern European archeology at the universities of Hanover and Göttingen. From 1987–1994 he was department head, and from 1994–2011 director at the Landesmuseum Natur und Mensch, Oldenburg. In 2000, Fansa initiated the exhibition “Damascus - Aleppo. 5000 years of urban development” and then numerous exhibitions on the historical relations between Orient and Occident. He published two books, “Aleppo. A War Destroys World Heritage Sites” (2013) and “Syria. Six World Heritage Sites in the Turmoil of the Civil War” (2014), and later “Literary Aleppo”. Since 2016 he has been a member of the German Archaeological Institute and the Archeological Heritage Network, and since 2017 he has been chairman of the NGO Friends of Aleppo Old Town. He lives in Berlin.

Contact: m@fansa.de



Friends of Boka Kotorska

The Friends of Boka Kotorska Heritage Society is a non-governmental organization established primarily with the aim to protect and enhance the natural and built heritage in Boka Kotorska, especially the Natural and Culturo-Historical Region of Kotor as part of the World Heritage. The organization was founded provoked by the current appalling state of the cultural and natural heritage in the area of Boka Kotorska. Its founders are experts in cultural heritage protection from Boka Kotorska. The Society has had several projects and actions aimed at pointing out the problems in the World Heritage Region.

Contact: bokeskabastina@gmail.com



Teresa Gil



Teresa Gil is a Spanish biologist with 19 years of professional experience in Natura 2000-Protected Areas management and habitats and flora conservation. Since April 2019 she is the Head of the WWF-Spain Freshwater Programme. WWF-Spain's origin is closely linked to Doñana. During 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 marshlands restoration in Guadalquivir Estuary as a

way to restore some of the losses of the past, while reducing the risk of 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.

Contact: tgil@wwf.es

Green Salvation



The Ecological Society “Green Salvation” was founded in 1990 and is registered as a public organization of the city of Almaty. Green Salvation's goal is to protect the human right to a healthy and productive life in harmony with nature, and to foster improvements to the socio-ecological situation in the Republic of Kazakhstan. The main Areas of Green Salvation's activities Include: 1. Defending the Human Right to a Favourable Environment. | 2. Participation in the Development of Environmental Protection Legislation. | 3. Environmental Awareness and Education. | 4. Environmental Actions. | 5. Collection of Data on the Environmental Situation in the Republic of Kazakhstan.

Contact: gsalmaty@gmail.com

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”.

Contact: greiff-gossen@go-on-software.de

Fritz Groothues



Fritz Groothues is a retired journalist and head of strategy at the BBC World Service. He has been campaigning against non-essential motor vehicles on the tracks near Little Langdale since 2005.

Contact: fritzgroothues@yahoo.com

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.



Contact: nielshenrikhooge@yahoo.dk

International Campaign for Tibet



The International Campaign for Tibet (ICT) works to promote human rights and democratic freedoms for the people of Tibet. ICT monitors and reports on human rights, environmental and socio economic conditions in Tibet; advocates for Tibetans imprisoned for their political or religious beliefs; works with governments to develop policies and programs to help Tibetans; ecures humanitarian and development assistance for Tibetans; works with Chinese institutions and individuals to build understanding and trust, and explores relationships between Tibetans and Chinese, obilizes individuals and the international community to take action on behalf of Tibetans; and promotes self-determination for the Tibetan people through negotiations between the Chinese government and the Dalai Lama. Founded in 1988, ICT maintains offices in Washington, DC, Amsterdam, Berlin, Brussels and Dharamsala, India.

advocates for Tibetans imprisoned for their political or religious beliefs; works with governments to develop policies and programs to help Tibetans; ecures humanitarian and development assistance for Tibetans; works with Chinese institutions and individuals to build understanding and trust, and explores relationships between Tibetans and Chinese, obilizes individuals and the international community to take action on behalf of Tibetans; and promotes self-determination for the Tibetan people through negotiations between the Chinese government and the Dalai Lama. Founded in 1988, ICT maintains offices in Washington, DC, Amsterdam, Berlin, Brussels and Dharamsala, India.

Contact: kai.mueller@savetibet.de

Sultana Kamal

Sultana Kamal is a Lawyer and Human appointed as an advisor to the Caretaker Government in October 2006 from which she resigned with 3 other colleagues in December the same year. From September 2001 to March 2016 she led one of the front-line human rights organizations Ain o Salish Kendra (ASK). Sultana Kamal



was born to a family that was engaged in progressive movements of the sub-continent since the days before partition. She is involved in numerous civil society organizations and other social activism, and received prestigious national and international awards for her work. She obtained a Masters in English Literature in 1971 from Dhaka University and became a lawyer with the hope to provide legal assistance to the disenfranchised, especially women. In 1981 she did a Masters in Development Studies from Holland.

Contact: bapa2000@gmail.com

Mikhail Kreindlin

Mikhail Kreindlin (1970) is a biologist and lawyer. He participated actively in the work of the Nature Protection Squad (Druzhina) of the Faculty of Biology of the Moscow State Lomonosov University in the period 1986-98. In 1991-2002 he worked in state structures dealing with management of protected areas. He works now as Protected Areas Campaign Coordinator for Greenpeace Russia and has been involved in work related to natural World Heritage properties since 2001. He has conducted various court cases connected with the protection of the natural World Heritage properties.

Contact: mikhail.kreindlin@greenpeace.org



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. Zoltan 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.

Contact: zoltankun71@yahoo.com

Nora Lafi

Nora Lafi has a PhD in history from the University of Aix-en-Provence (1999). She teaches at Freie Universität Berlin and presently works as a Senior Research Fellow at the University of Erfurt (Max-Weber-Kolleg, Religion and Urbanity Research Group). She specializes on cities of the Ottoman Empire and particularly on the relationship between the civic sphere, urban governance and the transformation of the urban structure, and has published extensively in this field. Nora Lafi also specializes on reflections on the concept of heritage protection and on its impact with ideologies and conflicts. Among her publications on this theme: "Building and Deconstructing Authenticity in Aleppo: Heritage between Conservation, Transformation, Destruction and Re-Invention" in Bernhardt (C.) et al. (eds.), *Gebaute Geschichte*, Göttingen, Wallstein, 2017.

Contact: noralafi@zmo.de



Geoff Law

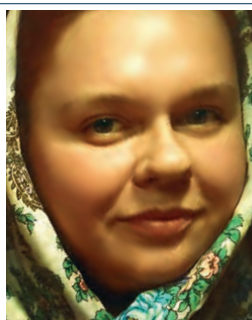
Geoff Law has spent much of his life protecting forests in Tasmania and has been awarded membership to the Order of Australia for his work as a conservationist. Advocacy is his specialty, and his efforts resulted in the inscription of the Tasmanian Wilderness on the World Heritage List in 1982. He has worked as advisor to Goldman Prize recipient Bob Brown. His experiences in conservation and advocacy at the Franklin and lower Gordon Rivers in Tasmania can be found in his memoir *The River Runs Free*, published in 2008. He has authored and published several



Contact: geoff.law144@gmail.com

Anastasia Martynova

Anastasia Martynova as a member of the ICOMOS National Committee in the Russian Federation and a candidate member of the All-Russian Society for the Conservation of Nature. In July 2019 she was nominated to the post of President of the ICOMOS National Committee in the



Russian Federation (there were only two candidates, and she was the candidate from the St. Petersburg branch). Her research interests include questions of protection and safeguarding of Russian World Heritage Sites (in particular natural), cultural heritage in Finland and the Russian Federation. Anastasia is a historian, art-critic, art historian and journalist. She has written numerous scientific publications on the importance of preserving Russia's tangible and intangible heritage (for example the city of Vyborg and its surroundings).

Contact: martynovanastjia@mail.ru

Yonathan Mizrachi



Yonathan Mizrachi is the Founder and Executive Director of Emek Shaveh (2009-2019), an Israeli NGO working to protect Jerusalem's Old City Basin as a multi-layered and multicultural historic city. Emek Shaveh approaches the sites and monuments of Jerusalem as shared heritage sites and believes that archaeological sites cannot constitute proof of

precedence or ownership by any one nation, ethnic group or religion over a given place. Yonathan has an MA in archaeology from the Hebrew University of Jerusalem (HUJI). He worked as an archaeologist with the IAA (Israel Antiquities Authority) in East and West Jerusalem and has participated in multiple excavations led by HUJI professors as well as community-led digs. His excavations were published in Israeli academic journals.

Contact: yonathan@alt-arch.org

Yulia Naberezhnaya

Yulia Naberezhnaya was born in Sochi, Russia, and has been actively working there most of her life. She studied ecology and



rational nature management at the International University for Ecology and Political Science in Moscow and is interested in different perspectives of natural heritage and protected areas. Currently she is the Deputy Coordinator of the NGO Environmental Watch on the Northern Caucasus, an organization she has been with since 1998. An

active member of the Sochi branch of the Russian Geographic Society since 1995, she is a member of the Expert Group for the Committee for Tourism and Ecology within the Sochi City Assembly. As an external expert she is often asked to provide environmental expertise of the Ministry for Nature of Krasnodar Region. Since 2015 she is also Deputy Chair of the Coordinating Environmental Council under the Mayor of Sochi.

Contact: tangla8@gmail.com

Ghazal Nouri



Ghazal Nouri is an architect with an M.A. degree in Restoration and Revitalization of Historic and Urban Buildings, and Ph.D. in Archaeology. She is a member of the Young Researchers Club and the International Tour Guiding of Cultural Heritage, Handicrafts and Tourism Organization of Iran, and works as an international tour leader, specifically in educational tourism in World

Heritage sites to increase both young tourists and students' awareness about WH sites. Moreover, she is a member of Tehran Construction Building Organization. She has been teaching as an invited teacher at Islamic Azad University and PNU branches since 2005 till now. She has been working online with the geography and history department of Complutense University of Madrid (UCM) from 2016–2018 on Iran's World Heritage in Danger. Her research focuses on educational and archaeological tourism.

Contact: sahand.igv@gmail.com

Alejandro Olivera

Alejandro Olivera is Mexico Representative for the Center for Biological Diversity. He works to conserve Mexican wildlife, including highly endangered vaquita porpoises and loggerhead sea turtles. He is a marine biologist from the University of Baja California Sur and has a master's degree in use, management and preservation of natural resources as well as a diploma in environmental law. He comes to the Center after years of work at the Mexican Center for Environmental Law (Cemda) and Greenpeace México. He is a petitioner for "in danger" designation of two World Heritage Sites in Mexico: The Islands and Protected Areas of the Gulf of California and Reserva de la Biósfera El Pinacate y Gran Desierto de Altar.

Contact: aolivera@biologicaldiversity.org



Frank Petersen

Frank Petersen shares a working commitment at the Dutch NGO "Waddenvereniging" to promote and protect the natural beauty of the Wadden Sea. The Waddenvereniging is an independent organization with no formal or financial ties to the Dutch government and has approxi-



mately 50,000 members. In 2016 the Wadden Sea was chosen as "the most beautiful natural landscape in the Netherlands" and has been a World Heritage property since 2009. Waddenvereniging aims to convince both the public and the private sector that conservation of this unique natural environment is best done without new or ongoing mining projects underneath the boundaries of this World Heritage property.

Contact: petersen@waddenvereniging.nl

Andrey Petrov

Andrey Petrov (1958) is a geographer. He graduated from the Faculty of Geography of the Moscow State Lomonosov University and then worked there as a scientist. He was an active member of the Nature Protection Squad (Druzhina) in the period 1977-1990 and has a PhD. He has worked as World Heritage Campaign Coordinator in Greenpeace Russia since 2005. He is an expert in questions regarding protected areas, environmental tourism and the application of the World Heritage Convention. He was elected as one of the Heritage Heroes at the 39th Session of the World Heritage Committee. Andrey has travelled extensively throughout Russia and has visited 76 other countries.

Contact: andrey.petrov@greenpeace.org

Gerry Proctor

Gerry Proctor has an Honours in Theology and a Masters in Philosophy at Liverpool Hope University with a thesis entitled "A Commitment to Neighbourhood". He worked for eight years with young people in the town of St Helens and then spent six years living and working in Latin America in poor communities in Ecuador and Bolivia. He then returned to Liverpool, his birthplace, and worked for 12 years in charge of one of the largest Roman Catholic communities in the city. In the past decade he has lived in the apartment complexes of the city centre and waterfront working with residents and founding Engage Liverpool which works to improve people's quality of life and raise the profile of urban issues to improve the sustainability of city living. He sits on the Liverpool World Heritage Site Steering Group.

Contact: proctorgerry@hotmail.com



Krupa Rajangam



Krupa Rajangam is a critical heritage practitioner-scholar with over 19 years of field-based dedicated conservation experience, which includes 4 years of fieldwork at Hampi WHS for various projects and initiatives. Her doctoral thesis on Hampi sought to understand the everyday realities of conservation-management of the Hampi site. Her contribution is based

on discussions, conversations, interviews, and observations with various groups/individuals (over 200 interviews) interested in and/or living on site. She is the founder of the Bangalore based heritage collaborative Saythu...linking people and heritage that aims to bridge theory and practice through a methodologically grounded approach to heritage conservation-management.

Contact: rajangamk@gmail.com

Herbert Rasinger



Herbert Rasinger has been the chairman of the Cityscape Protection Initiative (Initiative Stadtbildschutz), based in Vienna, Austria since 2015. He is active in cultural heritage site (last atelier of Gustav Klimt) and city protection matters (Wien Mitte, Vienna ice skating ring). He is a graduate of the Vienna Technical University and of a high school in Wilmington, Delaware, USA.

Contact: i-stadtbildschutz@aktion21.at

Gianluigi Salvador

Gianluigi Salvador (1942) studied statistics and demographics at the University of Padua and Rome. He worked for thirty years as a company inspector at IBM Italy on IT projects and quality management systems. He was a trade union delegate in the company and a municipal councilor in Carnate (Milan) for the Green Party from 1990 to 1994. He was also at the same time in the Federal Council of the Greens of Lombardy. From 2002 to 2012 he was regional councilor of the WWF for energy



and waste, and participated in the drafting of the national waste position of WWF Italy. In 2007 he participated in the foundation of the Movimento della Decrescita Felice (MDF), a movement inspired by Maurizio Pallante. Since 2014 he has been on the board of PAN Italia (Pesticide Action Network) with activities to stop the devastation caused by synthetic pesticides in monoculture vineyards in Veneto.

Contact: gianlu.cali@libero.it

Daniel Scarry



Following volunteer experience in the Republic of Macedonia in 2005/6, Daniel Scarry became engaged with Ohrid SOS, a local citizen initiative devoted to the meaningful protection of Macedonia's UNESCO Ohrid region, nearly four years ago after proposals were announced to drain the vital Studenchishte Marsh wetland and impose large-scale tourism

infrastructure upon the site. Fascinated by habitats, biodiversity and the interplay between them, he has co-authored two journal papers and several reports/articles related to socio-ecology, wetland protection and natural heritage conservation in Macedonia.

Contact: dscar.ohridsos@gmail.com

Christian Schuhböck

Christian Schuhböck (*1962) founded the "Alliance For Nature", an organisation for the protection of natural and cultural sites while a student, and has been its Secretary General ever since. In 1988/89, he organised the initiative "Rettet das Dorfertal" in order to preserve the Eastern Alps from the construction of a very large storage power station and at the same time enable the creation of the Hohe Tauern National Park. For this he was awarded with the Austrian State Prize for the Protection of the Environment. Since 1990, Mr. Schuhböck has been working in the context of the UNESCO World Heritage Convention, and he has substantially contributed to Austria's compliance with this Convention. He played leading roles in the inscription of the Semmeringbahn and its landscape (1998), the Wachau (2000), and the Swiss Alps Jungfrau-Aletsch (2001) in the World Heritage List.



Contact: office@alliancefornature.at

Eugene Simonov

Eugene Simonov is an environmental activist and expert residing in China. He is the International Coordinator of the Rivers without Boundaries Coalition (RwB) focusing on North Eurasian transboundary rivers. He collaborated with the WWF Amur Program to curtail three hydro-power projects and designed a methodology for basin-wide environmental impact assessments of hydro-power and analysis of the role of hydropower in flood management. He also works with the tri-lateral “Dauria” International Protected Area and the Sino-Russian Expert Committee on Biodiversity and Protected Areas. Since 2012, RwB has campaigned on hydropower projects sponsored by the World Bank and China Exim Bank. Since 2016 Eugene has worked with the Green Silk Road Coalition that pushes for more accountability and environmental sustainability of China’s Silk Road Economic Belt integration initiative.

Contact: esimonovster@gmail.com

Shaju Thomas



Dr. Shaju Thomas (59) is a scholar, teacher, author and conservationist from India. He has spent over 20 years monitoring and inventorying the biodiversity of the Western Ghats, a World Heritage site. He has a PhD in science and served 31 years at the zoology department of Nirmala College in Kerala, retiring as head of the department in 2014. He

then joined the Tropical Institute of Ecological Sciences, Kerala, a conservation-research NGO, where he works as head of the Division of Environmental Education and Conservation. He has authored more than 25 publications, eight books and six study reports. He has been active on the boards of universities and represented India at the UN – REDD Global Consultation in the Philippines in 2008. He is an active member of the IUCN Commission on Education and Communication.

Contact: drshaju@gmail.com

SOS Orinoco

SOS ORINOCO

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 unfolding human and environmental disaster. SOSOrinoco has published three in-depth reports on threatened Protected Areas that are considered critical in this region: Canaima National Park (World Heritage Site), Yacapana National Park and Alto Orinoco-Casiquiare Biosphere Reserve (home of the Yanomami indigenous people).

Contact: info@sosorinoco.org

Yuri Vorovskoy

Yuri Vorovskoy is an ecologist and the director of the Heritage Institute, a private institution in ecology and environmental protection, is also a member of the Adygeya Republican Branch of the All-Russian Society for the Protection of Nature. He was born in Maykop in the Adygeyan Republic of the Russian Federation. In 2007 he graduated from Maykop State Technological University with a degree in forestry. His main areas of activity are conservation, forestry, environmental law, monitoring and control of deforestation within the boundaries of protected areas and the Western Caucasus World Heritage Site.

Contact: argus700@mail.ru



Martin Wagner



Martin Wagner is the managing attorney of Earthjustice’s International Program, which partners with lawyers and communities around the world to catalyze the transition from dirty fossil fuels to clean energy solutions and defend the human right to a healthy environment. Martin’s work has included precedent-setting litigation and advocacy aimed

at slowing climate change, establishing the right to a healthy environment, opposing international trade measures that undermine environmental protections, and creating and defending mechanisms for public participation in environmental decision-making worldwide. Martin graduated from the University of Virginia School of Law, served as a law clerk to a judge on the US Court of Appeals for the Ninth Circuit, and has taught law school courses in international environmental law and international trade and the environment.

Contact: mwagner@earthjustice.org

Ariane Wilkinson

Ariane Wilkinson is a Senior Lawyer at Environmental Justice Australia, a not-for-profit, public interest legal practice where she uses her legal expertise to advise and act for communities impacted by fossil fuel projects and the impacts of climate change. Her legal practice also involves advocating for laws which hold polluters accountable, promoting and defending clean energy laws and advocating to reform Australia's laws to make sure they protect the right of all Australians to clean water, clean air and a safe climate future.

Contact: ariane.wilkinson@envirojustice.org.au



Günter Wippel



Günter Wippel holds a degree in economics and has worked on issues such as uranium mining and human rights since the 1980s. He was a co-organizer of the The World Uranium Hearing in Austria (1992) and has attended many conferences on the issue of uranium mining. In 2003, he co-founded a human-rights group, MENSCHENRECHTE 3000

e.V., connecting human-rights violations and environmental destruction. This NGO has also worked for many years on the rights of indigenous peoples. In 2008, he initiated the working group "uranium-network.org" and co-organized international conferences on the impacts of uranium mining in Bamako / Mali (2012), in Tanzania (2013) and in Johannesburg / South Africa (2015). The NGO works with communities affected or threatened by uranium mining worldwide, focusing most recently on countries in Africa.

Contact: gunterwippel@aol.com

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“.

Contact: peto@wolf.sk



Asli Zeren

Asli Zeren is a post-doc researcher and lecturer in the field of Cultural Heritage Studies. Coming from a multidisciplinary background in Philology, Archaeology and Architecture with a major focus on heritage conservation, she holds a Ph.D. in Architecture from Politecnico di Milano. Her Ph.D. research focuses on the analysis of the current management strategies of the Historic Areas of Istanbul based on the principles of the Historic Urban Landscape Approach. She has recently completed her first postdoctoral research at 'École des hautes études en sciences sociales (Centre d'étude des mouvements sociaux) on exploring the irreversible and traumatic destruction of heritage values in urban environment as a result of heritage politics, urbanisation and globalisation processes while questioning the existence of local community participation in this rapid and what seems to be inevitable transformation.



Contact: aslizeren@gmail.com



WORLD HERITAGE WATCH

World Heritage Watch is an independent non-governmental organization founded in 2014 and committed to the preservation of the UNESCO World Heritage worldwide. We keep watch that the World Heritage is not sacrificed to political compromise and economic interests. We support UNESCO in obtaining up-to-date, complete and accurate information about the situation of World Heritage properties. And we help local people to protect their sites and to have a reasonable benefit from them.

World Heritage Watch (WHW) is also a worldwide civil society network of more than 150 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.

World Heritage Watch e.V.

Brüderstr. 13
10178 Berlin
Germany

Tel +49 (030) 2045-3975
contact@world-heritage-watch.org
www.world-heritage-watch.org

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Map of the properties covered in this volume