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CULTURAL AND NATURAL HERITAGE**

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**Information Document: Report of the International Mission to Pirin  
National Park, Bulgaria, 11-16 February 2002**

The Committee is requested to take note of the report of the UNESCO-IUCN joint mission to Pirin National Park, Bulgaria, 11-16 February 2002, and to review the conclusions and recommendations of the mission contained in section II. F of this document under item 21 of the Provisional Agenda (State of conservation of properties inscribed on the World Heritage List, working document WHC-02/CONF.202/17). Furthermore, the Committee may wish to review the recommendations by the 26<sup>th</sup> session of the World Heritage Bureau (working document WHC-02/CONF.202/2) concerning the site.

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## **ACKNOWLEDGEMENTS**

The UNESCO World Heritage Centre organized the Mission on behalf of the World Heritage Committee at the invitation of Madame Doloras Arsenova, Minister of Environment and Water (MoEW), Sofia, Bulgaria (12 September 2001) and authorized by the twenty-fifth session of the World Heritage Committee, Helsinki December 2001. This was done in conjunction with and assistance from the World Conservation Union–IUCN and MoEW Sofia, Bulgaria. The National Nature Protection Bureau (NNPS), MoEW arranged meetings and logistics necessary to complete the objectives of the Mission. The Director of the National Nature Protection Service, Hristo Bojinov, kindly accompanied the Mission Team and assigned MoEW personnel to assist the Mission Team as necessary. IUCN recruited Ms. Boriana Mihova, (IUCN World Commission on Protected Areas Member) to further assist the Mission Team with translation and interpretation. The Mission Team met with MoEW officials, members of the Pirin Ski Development Proposal team (“ULEN” Corporation), Pirin National Park Director and Staff and Ski area work force and concession operators, members of the Swiss Bulgarian Management Plan Project, the Mayor of Bansko, other elected Bansko officials and local community leaders, members of the Bulgarian Academy of Sciences, and representatives of numerous concerned Non-governmental Organizations, potential donors and private citizens. In each case, these individuals provided information and insight, which assisted the Mission Team to achieve its objectives.

## EXECUTIVE SUMMARY AND RECOMMENDATIONS

Following repeated concerns expressed by Bulgarian NGOs for potential threats from a proposed new Ski Development Project in Pirin World Heritage site (WHS) and additional information provided by IUCN and Minister Dolores Arsenova, Environment and Water (MoEW) and at the invitation of the Minister (MoEW), with the authorization of the twenty-fifth session of the Committee, Helsinki, a UNESCO/WHC–IUCN Mission was sent to Bulgaria 11-16 February 2002.

The Mission observed that the potential threats to World Heritage values preceded the current development proposal and began with inscription of the site (1983) with omission of key nomination documents including legal boundary maps and management plans. Subsequently, the development of a ski area within the WHS (1986) authorized prior to inscription, but constructed without the consideration or review of the Committee or Advisory Body further accentuated the situation. Recent procedures and precautions taken by MoEW required under Bulgarian Protected Area law for the proposed expanded ski development project including public hearings, Environmental Impact Assessment and review by the High Expert Ecological Council have been upheld through the appeals filed by local NGOs to the Supreme Administrative Court. Gateway communities are in favor of the development project as a potential source of employment and income for an otherwise economically depressed region.

In perspective, the new ski development project footprint appears to include a relatively minor new forest disturbance (29.71 Ha) for ski runs and facilities within the existing ski development area (818.46 Ha). A new all-season cable lift to transport skiers and visitors to and from the nearby town Bansko is proposed with the desirable elimination of motor vehicle access to the area. Re-forestation and other remediation measures with the removal of facilities and equipment is proposed by the project for the recovery of abandoned activity areas (21 Ha); natural reforestation is already taking place on abandoned ski runs with modest gradients. With effective management, controls and enforcement and without additional intensive use or development beyond that proposed, anticipated increases in visitor use should not exceed acceptable limits of change or further adversely impact World Heritage values. However, remedial actions are required to further assure World Heritage values of Pirin WHS can be protected. Such remedial actions should include developing effective management controls as well as the reforestation efforts proposed in the new project. The ski development area in Pirin WHS is modest in comparison to existing ski development in World Heritage Sites in Canada, USA, New Zealand and elsewhere in Europe, but it should not be ignored that the area is valued for high endemism and speciation requiring cautious and best management practice standards. It is further noted that ski development expansion has not been permitted in other World Heritage Sites once the area has been inscribed on the World Heritage List. A variety of other adverse issues of management concern will be addressed in the new management plan being prepared under the Bulgarian-Swiss Management Plan project. Delays in completion of this management plan warrant the preparation of an “Interim Plan” to guide development and management through the new project development phase and to assure management controls are in place upon its completion.

The State Party has stated that it recognizes the immediate need to address the original nomination deficiencies and has agreed to take the necessary appropriate actions and provide additional information. Pending and contingent upon the receipt of: (a) An accurate boundary map of Pirin WHS (1983) showing the existing and proposed ski

development areas; (b) An “Interim” Management Plan indicating the intent of MoEW with respect to management objectives, development, management, staffing, visitor use and presentation compatible with best practice and protective of World Heritage values; and, (c) The creation of a Scientific Advisory Body for Pirin WHS as indicated in the nomination:

It is recommended that decisions regarding Pirin WHS be deferred until the anticipated material is received and reviewed.

Should this material not be received in a timely manner (prior to the 26<sup>th</sup> session of the Committee), it is recommended that the Committee consider Pirin WHS under Potential Threat in terms of the Operational Guidelines (para 83 (ii- a, b, d) and inscribe Pirin WHS on the World Heritage In Danger List.

It is recommended that due consideration and preparatory assistance be given to the State Party to nominate an extended and modified boundary of Pirin WHS to further protect and manage possible World Heritage values omitted in the original nomination should it be requested. Further, it is recommended that requests for training assistance be favorably considered to assure staff capability is adequate to effectively implement the forthcoming complete Bulgarian–Swiss Biodiversity Conservation Project Management Plan in accordance with World Heritage best practice standards.

## **I. Mission Background**

Although authorized in the Pirin Forest Management Plan (1983), the specific construction of a hotel and development of an 818.46 Ha winter sports zone in the Vihren Valley above the Municipality of Bansko and within Pirin WHS was first noted in the ninth session of the Committee, 1985. That development was completed in compliance with existing Bulgarian legal requirements (1986) without further comment by the Advisory Body or the Committee.

The Bulgarian authorities informed the Secretariat and the twenty-fourth session of the Committee of the decision to approve a modification of the existing ski development area in accordance with Bulgarian Protected Area Law (1999). The Committee requested further clarification of the situation and additional information. The Bulgarian authorities responded to this request 12 September 2001.

The twenty-fifth session of the Committee reviewed the concerns for Pirin National Park including the elaboration on the proposed ski development expansion project provided by the Ministry for Environment and Water (MoEW), the additional concerns expressed by a consortium of NGOs and the accompanying IUCN comments. Upon noting remaining concerns over the possibility of continued incremental development, and in response to the invitation of Minister Dolores Arsenova (12/9/01), the Committee authorized an UNESCO-IUCN Mission to review the situation as quickly as possible. The Mission Team of R.C. Milne (Chief of Mission) and Dr. Gerhard Heiss (IUCN) was organized to visit Bulgaria 11-16 February 2002.

## **II. Mission Report**

### **A. Ressource Description.**

**1. Management of Forests.** Pirin National Park is covered with 17,209 Ha of forest corresponding to 42.7% of its territory. The dominant tree species include Macedonian pine (31.5%), Scotch pine (30.1%), Norway spruce (13.8%), common silver fir (7.1%), common beech (6.7%), Austrian pine (5.3%), and Bosnian pine (5.2%). Approximately 2,000 Ha are old growth forests with stands over 140 years in age: 75% of old growth forests consist of Macedonian (1,100 Ha) and Bosnian pine (375 Ha). These old growth forests are mainly preserved within the former Strict Nature Reserves of Bayuvi Douпки-Dzhindzhiritsa (2,859 Ha) and Yulen (3,156 Ha). In the latter areas, minor variations of size are noted in various references. In particular in Bayuvi Douпки-Dzhindzhiritsa, Macedonian and Bosnian pine reach their maximum heights with individuals up to 45 m high (26 m Bosnian pine) and 500 years in age (1,100 years Bosnian pine). While Bayuvi Douпки-Dzhindzhiritsa has already existed (combined into a single reserve in 1979 from three separated parts) at the date of the World Heritage nomination, establishment of Yulen Strict Nature Reserve took place in 1994. Bayuvi Douпки-Dzhindzhiritsa is completely enclosed within the boundaries of the WHS, whereas Yulen is only partly included (detailed area figures are not available).

Macedonian and Bosnian pine represent the most important and conspicuous tree species of the WHS. Both species are endemic for the Balkans, but can be found elsewhere in other reserves in the Balkans as well. Besides Pirin National Park, Macedonian pine is protected in the Central Balkan National Park (Bulgaria) and Pelister National Park (Macedonia). Bosnian pine is protected additionally in Olympos

National Park (Greece) and Vicos Aoos National Park (Greece). However, Pirin WHS protects the largest Macedonian pine forest of all protected areas and Bayuvi Dupki-Dzhindzhiritsa contains the largest individual trees of this species. Also Bosnian pine reaches its largest dimensions within the Pirin WHS (26 m high, over 1,000 years old). Natural forest dynamics without human interference (besides suppression of fires) are required for strict nature reserves Bayuvi Dupki-Dzhindzhiritsa and Yulen only (about one third of the forest area of the WHS). As a remnant of management under the Forest Board (park management was separated out from the Forest Board in 1999), human interference continues within the majority of forest stands. In particular extraction of snags and dead timber represent a serious impact on biodiversity of fauna (snag-dependant bird species and saproxylic invertebrates) and flora (saprophytic fungi, mosses, lichens).

**2. Boundary.** The Pirin WHS boundary has been a persistent cause for uncertainty since inscription (1983). Without a clearly defined and accurate WHS boundary map in the nomination materials, or visible boundary demarcation on the ground, areas of particular sensitivity or possible encroachment and development have been problematic since inscription. The site inscribed (est. 26,479.8 Ha) appears to have been primarily a highly dissected cluster of two larger areas including the strict nature reserve of Bayuvi Dupki-Dzhindzhiritsa (2900 Ha) and Vikheren Peoples Park (6736 Ha) and five smaller protected forest areas. The boundary was reviewed (1986) with minor measurement corrections resulting in an area of 27,442.9 Ha, which appears to be the corrected and actual area of the Pirin WHS.

The development of original 818.46 Ha ski zone (1986) as authorized in the operative Forest Management Plan, nearly divided the WHS in half with possible adverse impact on species exchange between the two areas and introduced a significantly higher and more complex level of management requirements. Within this ski zone, 99.55 Ha were highly disturbed with the placement of ski runs, facilities and equipment. The Pirin management and protected area (not the WHS) was expanded to 40,066.7 Ha in 1987 without further World Heritage consideration at that time. This appears to have been an oversight on the part of the State Party with a misunderstanding on Convention requirements for WHS expansion. The Committee was then informed (1992) by the Bulgarian authorities of possible extensive boundary expansions into a trans-boundary area with Greece, but again no such nomination was forthcoming. Subsequent boundary modifications and the promulgation of the Bulgarian Protected Area Law (1999) resulted in the current Pirin National Park with an area of 40,332.4 Ha under the direct authority of MoEW. The authorities did not pursue a concurrent WHS boundary expansion proposal at that time.

At the time of the nomination, the Forest Management Plan in effect for Pirin had been prepared for a larger forest utilization scheme under the direction of the Forestry Committee and included the ski zone and hotel development within the WHS. The plan was not re-adjusted in light of World Heritage inscription.

The new ski zone proposed in the approved Territorial Development Plan (TDP) is for an overall total area of 1474.62 Ha, but includes portions of the Municipality of Bansko outside the WHS for the terminus of the proposed all-season Cabin Lift. With this in mind, this development proposal does not appear to expand significantly on the existing development footprint, nor the zone of previous influence within the WHS. New construction of ski runs, facilities or equipment in the WHS is restricted to 29.71 Ha of new forest clearing beyond the original 99.5 Ha ski development footprint. The

new ski project proposal is additionally scheduled to reforest and reclaim 21 Ha of abandoned ski development area.

Regardless of decisions concerning the legal boundary of the Pirin WHS, a clear and visible boundary demarcation both on maps and on the ground is required for effective resource protection and management.

## **B. Management and Integrity of Pirin World Heritage Site.**

**1. Staffing Capacity and Capabilities.** The nomination of Pirin WHS (1983) indicated that under pre-development conditions, the growth of management staff was expected to exceed 50 persons. During the 1992 IUCN assessment, it was noted that the staffing remained at the nomination level of 31. This has been now increased to the current level of 41 with five Chief Rangers to direct protection and enforcement activities and six science/technical specialists, but remains well below what was indicated in the nomination, or that estimated as required to effectively manage, protect and present World Heritage values. Increased winter and summer visitation can be anticipated in light of the proposed development. It appears desirable and necessary to increase both staffing capacity and capabilities with additional training to cope with increased visitation, the extended use seasons, resource management requirements and World Heritage Site responsibilities

The creation of the Scientific Advisory Body for Pirin as called for in the WH nomination would assist authorities to provide significant and objective guidance to site management personnel. The effectiveness of such scientific collaboration and capability is well demonstrated in the Srebarna WHS. Members of the Bulgarian Academy of Sciences are best qualified to assume this role.

**2. Park Management.** Park management does not address specific WHS values of outstanding international significance, nor does it appear to address additional requirements of the World Heritage Convention. This may be underlined by:

- Boundaries of the National Park and the WHS do not coincide. Specific WHS indications are missing on maps and in the landscape, which define the difference between the park and the designated WHS.

- Staffing required to manage Pirin NP does not reflect additional specific staffing and funding considerations for the research, monitoring, protection and presentation of WHS within the park. Neither the staff level of 41 persons nor current budget (in 2001 about 375,000 Leva/\$166,000 USD for staff/operational costs and about 200,000 Leva/\$88,000 USD for investments) were designed to consider the international significance of Pirin National Park in relationship to other Bulgarian national parks and protected areas. Without strengthened management capability and capacity, the integrity of the WHS is at risk.

**3. MoEW Identified Management Issues.** Management for Pirin National Park in general and the WHS in particular is faced with many challenges. Contrary to the World Conservation Monitoring Centre's (WCMC) most recent Pirin data sheet (1992), the Mission did not consider current management structure and efforts as particularly effective. The Pirin WHS (and the National Park) lacks an appropriate Management Plan to establish management priorities, guide decision-making and to maintain the integrity of World Heritage values. The Director of the

National Nature Protection Service (MoEW) identified the following unresolved management issues, which he defined as “threats”. This list is not in order of priority and most if not all issues reflect deficiencies in staffing capacity, lack of effective implementation of an appropriate Management Plan and ineffective enforcement of existing regulations.

The Mission accepts MoEW’s list of “threats” as probable given the circumstances faced by MoEW in implementing a new regime of area reclassification and conversion from forest management to the relatively unfamiliar National Park status under the Protected Areas Law (1999) and related staffing capacity limitations:

**3.1. Uncontrolled Tourism and Camping.** With expected increases in both winter and summer use of Pirin, a variety of control measures are required to mitigate adverse visitor impacts. The establishment of standards for limits to acceptable change in areas of concentrated use (winter use areas, trails, shelters and huts and in areas of particularly sensitivity) is required. Information and signage programmes are necessary. A visitor-use permit system is recommended for hikers and campers. The visible presence of a well-trained and distinctly uniformed ranger force would assist in the enforcement of related visitor-use regulations.

**3.2. Sewage and Waste Water Pollution.** Of particular concern was sewage water and waste disposal in areas of winter-use concentration. The focal point of ski-tourist attraction in the Bansko ski-zone provides at present only one toilet for as many as 2,000 people per day. Sewage seeps untreated into the ground and possibly water systems. The TDP calls for improvement of this present situation for those facilities and installations for which the Yulen Society (concessionaire of facilities and installations) will be responsible. However, there are other buildings in private hands (hotels and restaurants) and shelters scattered throughout the WHS where sewage water and waste problems exist. According to information provided by the Bulgarian Swiss Biodiversity Management Plan Project Team, treatment/disposal systems are entirely lacking.

**3.3. Unregulated grazing.** Domestic stock and illegal fires started by shepherds for enlargement of grazing grounds must be considered as serious impacts for the natural values of the WHS. Official publications of MoEW show photos of extensive summer grazing grounds around Vihren Mountain within the WHS. However, most of the traditional pastoral grounds are located on the southern slopes of the range outside the existing WHS, but are part of the Pirin National Park. This should be closely taken into consideration if the State Party nominates an enlargement of the existing WHS.

**3.4. Illegal Tree Harvest, Fires and Poaching.** Threats of illegal tree cuttings occur in the Razlog municipality of the WHS (northwestern part) within the boundaries of the WHS. The Bayuvi Douпки-Dzhindzhiritsa strict nature reserve appears to extend down to the bottom of the valley in this municipality and offer easy access for potential offenders. Most cutting to date appears to have been carried out outside the WHS. Only a few single trees appear to have been cut within the estimated boundaries of the WHS. However, the threat for further illegal activity will increase in the near future due to the progression of alleged illegal overexploitation of stands outside the WHS. According to the park staff, inadequate equipment, enforcement and cooperation among local authorities (Forest Commission, Police) impede prosecution. Apprehending offenders is difficult with current staffing. Offenders are not usually



convicted unless they are caught in the act and the courts have been lenient with convicted violators.

Fire management in general poses a concern to the management staff. Illegal burning of meadows for expanded grazing, visitor started fires and spontaneous fires started by lightning all place demands on the management staff beyond current fire control capacities. Emergency response guidelines do not appear to be in place and fire fighting per se is dependant primarily on volunteer efforts with little or no equipment beyond hand tools.

Hunting and carrying firearms in the park are strictly forbidden. However, the poaching of “trophy” animals such as chamois allegedly takes place. Enforcement of such regulations is difficult in the mountainous terrain and requires additional special attention of park staff, law enforcement officials and the judicial system.

**3.5. Reforestation with inappropriate plant species.** Although under the control of the Park Management staff, the reforestation of disturbed areas with inappropriate plant species was identified by MoEW as a threat of concern. The Mission was informed that nursery grown tree species suitable for replanting in the WHS were available and would be used in the future. Clearly replanting efforts by the responsible parties should use only species typically found in the adjacent undisturbed forest.

**4. Additional Management and Integrity Issues.** The Mission identified the additional following management issues not specified by MoEW:

**4.1. Inappropriate Management Plans.** The Pirin Peoples Park was established in 1963 under the management authority of the Forest Committee. A succession of traditional forest management plans followed. Approved Forest Management Plans date from 1983 and 1993. Although the Mission was not able to read these Bulgarian multi-volume texts of previous plans, the figures and tables could be easily interpreted as addressing typical issues of commercial forest harvest: Forest cover was detailed in cubic meters and one volume consisted largely of the construction of feeding facilities for deer and equipment placement. After nearly forty years since establishment of the park and nearly twenty years since World Heritage nomination, the Bulgarian Swiss Biodiversity Management Plan Project will prepare the first management plan designed to conserve and present natural values in accordance with accepted national and international standards for National Parks. However, the management plan draft as now outlined appears to only superficially consider World Heritage Site status and criteria and is not scheduled for completion until after key management and development decisions will be taken by MoEW. After approval, it should be closely observed if the management plan is effectively implemented. The preparation and submission of an “interim” Management Plan to reflect the MoEW intent and direction for addressing World Heritage issues has been suggested and is under consideration.

**4.2. Development of Ski-zones in Other Municipalities.** The Bansko ski-zone within the Territorial Development Plan (TDP) was the primary focus of the UNESCO-IUCN Mission. However, the Bansko ski-zone is not the only ski zone

within the boundaries of the WHS. Since inscription in 1983, ski-zones have been developed in the municipalities of Dobrinisthe and Razlog. The construction of the latter (ski-zone Kulinoto) was approved in 1996 and boundaries of the Pirin Park and the WHS were changed at that time to accommodate that development. According to information of the park staff, that excised area covers about 50 ha. The ski-zone of Dobrinisthe now provides a ski lift of about 3 km in length. Three quarters of this ski run is within the WHS. Limited time did not permit the Mission to inspect this development site. The designated WHS appears to be within the jurisdictions of four other municipalities. If increasing income for the local people by development of ski-zones is one of the primary management objectives of the Pirin National Park and the WHS respectively, it seems likely that municipalities with no or minor ski-zone at present will seek approval for additional ski development in the future. Clearly this would directly cause the continued erosion of World Heritage values.

The Bulgarian Academy of Science and NGOs expressed concerns that the proposed Bansko ski-zone plans will set a precedent on which ski-zone development plans of other municipalities will follow. Those fears can be well understood considering the creation of several ski-zones and their permanent intensification since the WH nomination in 1983. The arguments proposed by development supporters during the Mission (high bed capacity in Bansko needs adequate capacity of skiing facilities) justify this concern. A regional development plan integrating all participating municipalities of the national park and focused on protection and preservation of Pirin's national and international values does not exist. The evident consequence could be an uncontrolled and unregulated competition among municipalities for establishing the most attractive tourist facilities.

**4.3. Construction of buildings in the Banderitsa Valley** (Municipality of Bansko, TDP-area). The Mission was informed that allegedly “illegal” buildings were located on the road from Bansko to the Bansko ski-zone within the WHS. The Mission observed several buildings within the WHS, but was unable to determine the dates of construction, or if they are “illegal” or not.

**4.4. Uncontrolled Skiers.** Uncontrolled off-piste downhill skiers and snow boarders short cut through sensitive dwarf mountain pine stands at the higher elevations of the Bansko ski-zone up to Todorka peak. Designated pistes cut through stands of dwarf mountain pine as well. The Mission observed that skiers using the chair lift do not always run down on the piste, but short cut off-piste damaging the dwarf pines exposed above the receding snow levels. More clearly defined ski runs and controls are required to minimize adverse impacts on sensitive resources.

**4.5. Scientific Research, Data Collection and Monitoring.** As with many nature reserves in Bulgaria, a wealth of detailed scientific information and data is available for interpretation and application to management. However, on-going research, systematic data collection and monitoring in Pirin is sporadic at best and does not address the priority ecological issues required by management. The capacity to objectively interpret and apply existing scientific data to management situations does not appear to be present in the park staff. Although called for by the State Party in the nomination of Pirin, a Scientific Advisory Body to guide WHS management decisions is not yet established. Stronger collaboration with the Bulgarian Academy of Sciences for this purpose is urged. Assistance from this Scientific Advisory Body would be required to address both additional broader long term “threats” identified by MoEW involving global climate change, ozone depletion, transboundary air and water pollution

and more localized changes in the ecosystem caused by visitor use (eg. wet meadows) and/or other anthropogenic disturbances.

**4.6. Presentation, Public Information and Environmental Education.** No identification of Pirin World Heritage Site inscription was observed on-site, or in the information brochures available in the town of Bansko. Public information available was focused on ski facilities, hotels and restaurants. Neither the presentation of World Heritage status nor values appear to be present. However, at least one schoolteacher was attempting to offer environmental education field trips into Pirin for her classes. Sadly, continuation of this apparently valuable programme for nature study and volunteer activity is unlikely without additional minimal external funds (2000 Lv/year) required for lunches and the programme will be terminated. Collaboration with the local private sector (hotel operators) to support school visits and information materials was encouraged.

**4.7. Volunteers.** A variety of on-going activities are at least partially supported by local volunteers. The search and rescue requirements associated with winter use and ski patrol are a volunteer effort. Fire fighting is dependant on volunteer cooperation. And as noted above, teachers attempt to carry out environmental education programmes, but lack necessary support and materials.

### **C. Conservation Status of Pirin World Heritage Site.**

The inscription of Pirin on the World Heritage List (1983) under natural criteria (i),(ii) and (iii) appears to have occurred without support of clearly defined boundary map and in the absence of a management plan provided to the Advisory Body (IUCN) or the World Heritage Committee. The multi-volume 1982 Forest Management Plan for the area had the primary objective of forest harvest; it was in Bulgarian and not available for review. The property inscribed appears to have been an almost discontinuous series of woodlands and mountain topography including several relatively small strictly protected reserves divided by high mountain terrain within a designated forest management area. In the absence of appropriate support documents, the Committee would have found it difficult to fully visualize the precise property, which was to have been managed at World Heritage standards and to grasp the inherent management difficulties to apply best practice to this property to maintain World Heritage values.

Prior to inscription, the Committee was assured in the Pirin nomination (1982) that staffing would be increased to provide adequate management capacity and that management would be assisted by a Scientific Advisory Body. Neither has been accomplished. Since that time, the legal situation regarding protected natural areas in Bulgaria has evolved to change the status of the inscribed Site (Protected Area Law, 1999). The Pirin protected area was increased in size to 40,0066.7 Ha (1987), and the boundaries of the protected area (but not the World Heritage Site) were further adjusted to 40,332.4 Ha (1999). This larger protected natural area designated as Pirin National Park in 1999 and was placed under the new management mandates and requirements of the Protected Areas Law under the administration of MoEW at that time.

Scheduled development took place in Pirin WHS without a detailed review by the Committee (99.55 Ha of access roads, parking, ski runs, facilities and equipment) within an 818.46 Ha ski zone) in 1986. By international standards, this existing

development is a modest ski area, which has never been fully operative due to recognized errors in planning and original placement of equipment and ski runs.

Through time, a somewhat random accumulation of ski-related facilities (shops, ski instruction, search and rescue, first aid, restaurants) is now tightly clustered at the termination of the primary slope and chair lift. Some select structures are attractive and appropriate, but others lack design appeal, out of scale and most are obviously a matter of individual and unplanned effort. One oversized structure was expanded for overnight accommodation. Portable toilets are currently used in lieu of any operable permanent sanitary facilities and refuse is disposed of in part in the forest behind the structures. Questions have been raised about possible ground water contamination from human waste. Water quality data was not available for Mission review. An intensive clutter of temporary and incongruous commercial advertising signs fail to enhance the atmosphere. No presentation of World Heritage status was visible, nor were Pirin National Park personnel observed. The area could rather quickly be enhanced with the establishment and enforcement of developed area management standards. Despite expressed concerns for congestion in this area, it was observed that lift lines did not delay the weekday skiers, nor were the slopes particularly crowded. Effective management controls and oversight could expand the visitor use capacity within limits of acceptable change.

The new ski development project within Pirin WHS proposal (1999) has undergone required Public Hearings, Public Environmental Impact Assessment (EIA) and High Expert Ecological Council (HEEC) review and been approved by the MoEW in accordance with Bulgarian law as determined through court adjudication. The MoEW resolution adopting an enhanced version of the proposed development plan was appealed to the Supreme Administrative Court of Bulgaria by a consortium of NGOs, but denied. Two separate additional appeals were made by NGOs against the resolution of MoEW based on the EIA, but denied by the three-member Supreme Administrative Court. The latter decision was then further appealed to the higher five-member Council of the Supreme Administrative Court of Justice where it was again rejected. As the Mission was informed by MoEW, the latter Justice Council decision is final in the courts of Bulgaria, and further appeals on the legitimacy of the project implementation on the grounds cited appear unlikely. However, World Heritage Convention requirements and obligations do not appear to have been considered by the NGOs or by the MoEW during project planning, review or adjudication. A copy of the development proposal resume (November 2001) prepared by the developer (ULEN Corporation) is included in the Appendix of the Mission Report.

#### **D. Considerations.**

The issue of ski development within Pirin WHS appears to be well after-the-fact. The primary impact and disturbance from ski development occurred with the original development of the area (1986-7). The terms and conditions of the new proposal do not appear to create additional excessive impacts or to exceed tolerances of the area even with increased visitor use, if the development is well managed and if anticipated reforestation and site remediation is successful and auto traffic to the area is reduced. However, the possibility of further additional significant development at other sites in Pirin building on the precedent of the new proposal would be of significant concern. Additional substantive development involving land disturbance, substantial structures and/or overnight facilities would likely cause cumulative adverse impacts on World

Heritage values and assurances against such additional development should be sought from MoEW.

Pirin gateway communities (primarily the Bansko Municipality and reportedly including Gotze Delchev, Sandanski, Kresna and Razlog) are in favour of the proposed enhancement of existing facilities as an anticipated expansion of income and employment opportunities in an otherwise economically depressed area. Additional tourist-related commercial infrastructure (hotels, restaurants etc) within the Municipality of Bansko is occurring in anticipation of increased Pirin visitation. Marketing studies or a regional economic analysis to support this investment and expectation were not available to the Mission Team although reference was made to a regional UNDP Tourist Development Study advocating diversified low impact ecotourism. The ski development proposal contains an all-season aerial cabin lift to transport Pirin visitors and skiers to and from the Pirin WHS development area from Bansko. With the related planned elimination of both visitor auto traffic to the development site and related parking facilities, the proposed cabin lift could reduce the impact of visitation in general. It is noted that significantly larger well-managed ski development areas with proportionally higher visitation currently operate within World Heritage Sites in Canada, the United States, New Zealand and elsewhere in Europe.

Reforestation, equipment and facility removal and site-disturbance mitigation (21 Ha) is proposed for correcting previous development errors. Additional new forest disturbance included in the proposed development project appears to be relatively small (29.71Ha). Selective tree cutting required to open two new ski runs; the construction of new facilities and new equipment installation is to be contained within this latter development footprint. Additional disturbance may occur on another 9.27 Ha of higher elevation scree slopes within the development footprint. If remediation and reforestation are successful, the net disturbance of forest would be a minimal 4.25 Ha according to MoEW.

Increased visitation anticipated with development will present increased MoEW management requirements necessary to assure the integrity of the WHS. In this regard, special attention to developing additional staff capacity and capability and management standards will be required. This may be partially achieved with new partnerships with the developer and nearby business establishments. There are ample opportunities to strengthen the protection of WHS values through increased collaboration with gateway communities and visitors with presentation materials, volunteer activities and specific projects.

If WHS boundaries continue to remain obscure and un-delineated and if management capability is not demonstrated, World Heritage values and resource integrity will be in potential jeopardy. Without an approved and effectively implemented Management Plan providing clear direction to resource protection, acceptable use and presentation, the protection and integrity of World Heritage values cannot be assured. Either proposals for additional significant development zones within and/or immediately adjacent to the WHS, or the excision of the Bansko ski development area from the Pirin WHS would set an undesirable precedent for possible future adverse and unacceptable impacts with the erosion of World Heritage values. Low impact and effectively managed ecotourism under controlled circumstances would provide compatible alternatives in lieu of additional significant development. Further, as was noted by the fifteenth session of the Committee, the Bulgarian authorities were at that time

considering a “major expansion” of the Pirin WHS, and the Committee “...encouraged the Bulgarian authorities to proceed with the extension of Pirin and submit a nomination for the extension of the site.” (1992).

**E. In summary,** many issues which constitute “Ascertained” or “Potential Threats” to Pirin WHS began with the inscription of the property without required support documents (boundary maps and management plan), continued with early development and have resurfaced with the expressed concerns of knowledgeable individuals and NGOs regarding the proposed additional ski development project. MoEW officials assured the Mission Team that the basic nomination deficiencies would be immediately remedied and the required documentation would be provided to the Committee for consideration. The receipt of these materials would provide the Committee with a more satisfactory basis for review and decision making with regard to the conservation status of Pirin WHS. The MoEW Minister and Director of NNPS have been advised of these requirements and concur with the need for rapid remedial action.

**Therefore:**

1. Pending and contingent on MoEW clarification and updating of recent details on the approved Ski Development Proposal and notice of the conclusion of appeal adjudication;
2. Pending and contingent on receipt from MoEW of the precise WHS Boundary Map including details on the existing and proposed Ski Development Zone;
3. Pending and contingent upon the receipt of an “Interim Swiss/Bulgarian Management Plan” as a preliminary official statement of intent for future management and pending the creation of a Scientific Advisory Body; and,
4. Pending the possible receipt of the Pirin NP WHS Boundary Extension nomination indicated initially by Bulgarian authorities in 1992 and encouraged by the fifteenth session of the Committee together with elaborations to reflect the inclusion and management of possible World Heritage resources beyond the current Pirin National Park boundary:

**F. Recommendations.**

**It is recommended:**

1. That decisions regarding the status Pirin WHS be deferred until the twenty-sixth session of the Committee, pending receipt and satisfactory review of the MoEW submission of the remedial World Heritage nomination related materials and information. MoEW may request Preparatory Assistance for the preparation of Pirin WHS boundary expansion and adjustments. Such assistance is recommended as are additional World Heritage assistance requests for implementing the Management Plan (in preparation) and/or the Convention as may be required. This would be recommended as in the interests of strengthened conservation, management, protection and presentation of World Heritage Values in Bulgaria.
2. In the event that the MoEW does not provide the agreed upon remedial supplemental materials and take the necessary actions prior to the twenty-sixth session of the World Heritage Committee Meeting

(Budapest, Hungary, June 2002), the Committee is advised that Pirin WHS unfortunately meets the conditions defined in the WHC/99/2 Operational Guidelines paragraph 83 (ii) (a) change in legal status, (b) planned ski development and (d) lack of management plan and boundary demarcation which constitute individually and collectively “Potential Threats” to World Heritage values as defined in the nomination and inscribed under criteria (i), (ii), and (iii) for Pirin World Heritage Site and appropriate constructive action is necessary. The State Party should be urged to resolve a wide spectrum of existing management issues potentially reflecting a significant loss of integrity, as well as to demonstrate the ability to effectively implement the Bulgarian-Swiss Management Plan upon its completion in 2003-4.

3. Although a separate consideration, the twenty-fifth session of the Committee was advised that the Bulgarian Srebarna WHS remains under potential threat from a possible toxic spill during high water conditions of the Danube. The Committee favorably considered the recommended acquisition of a suitable portable electric generator to enable Park Staff to rapidly close the sluice gates to protect the site from possible catastrophic contamination and rapid destruction of World Heritage values. The authorities have taken no further action. This may be the single most cost-effective intervention to safeguard the World Heritage Site and requires further immediate attention. MoEW agrees this would be a highly desirable action and has requested the proper assistance request forms. The Committee may wish to encourage the State Party to the necessary corrective action.