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MISSION REPORT / RAPPORT DE MISSION

Virgin komi Forest (Russian Federation) (719)
Forêts vierges de Komi (Fédération de Russie) (719)

3 – 11 October 2010

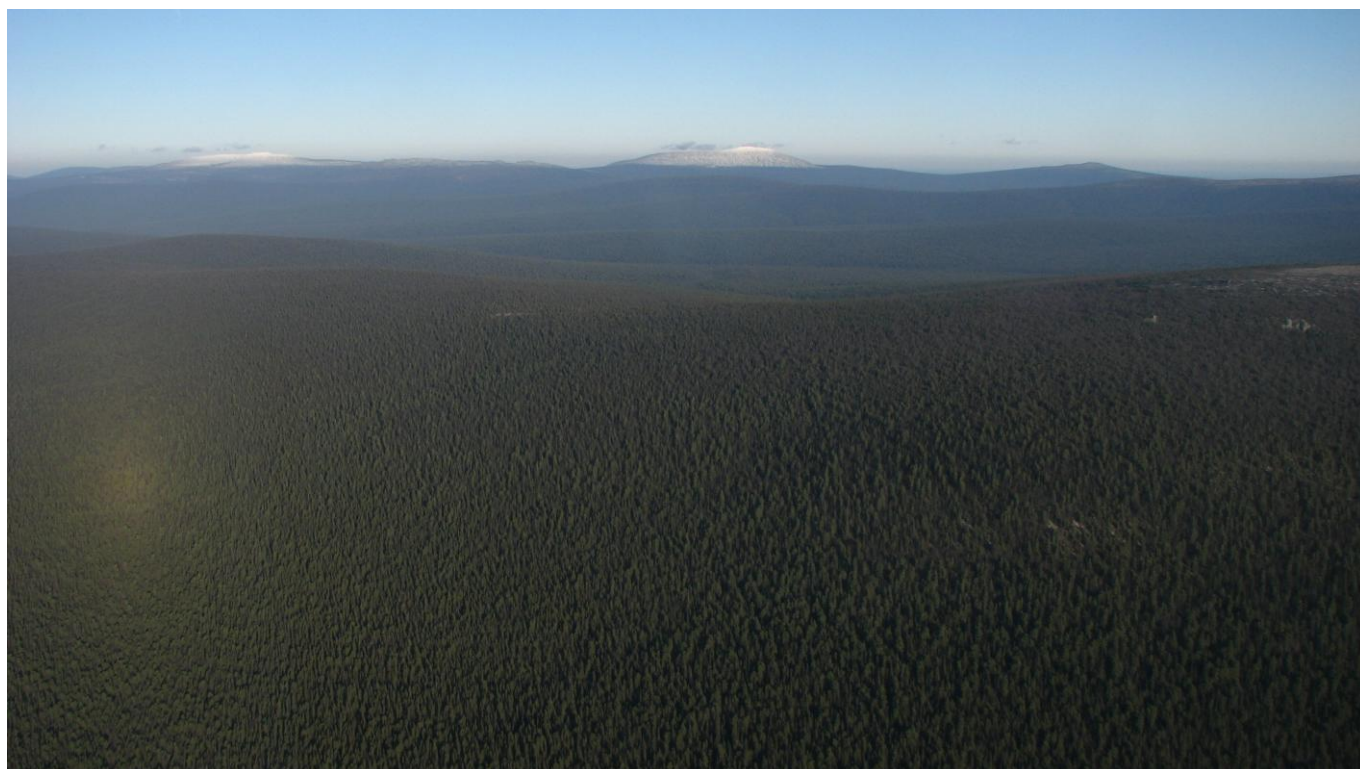
3 – 11 octobre 2010

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Ce rapport de mission doit être lu conjointement avec le document suivant:

WHC-11/35.COM/7B

MISSION REPORT

*Reactive Monitoring Mission to the Virgin Komi Forests
Russian Federation
3 to 11 October 2010*



**Guy Debonnet (UNESCO World Heritage Centre)
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October 2010

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Lastly, the mission is also grateful to Amirkhan Amirkhanov, Deputy Director of the MNRE, and Natalia Vavilova, from the Department of international Cooperation of the MNRE, for their participation and contribution at the debriefing meeting.

LIST OF ACRONYMS

EIA	Environmental Impact Assessment
IUCN	International Union for the Conservation of Nature
MFA	Ministry of Foreign Affairs
MNRE	Ministry of Natural resources and Environment
NGO	Non Governmental Organization
OUV	Outstanding Universal Value
PISNR	Pechoro-Illychsky Strict Nature Reserve
UNESCO	United Nations Education, Science and Culture Organisation
WHC	World Heritage Centre
YVNP	Yugyd Va National Park

EXECUTIVE SUMMARY

The joint UNESCO World Heritage Centre/ IUCN mission was conducted from 3 -11 October 2010, as requested by the World Heritage Committee (WHC) at its 34th session (Brazillia, 2010) in **Decision 34 COM 7B.25** (Annex 5). The mission focused on the Kozhym Basin located in the northern portion of the Yugyd Va National Park (YVNP), and the question of boundary changes and gold mining in this area. The mission also considered a number of other issues including; hunting and poaching, logging, the SRTO-Torzhok gas pipeline, the Podcherie-Vuktyl drinking water pipeline, forest fires, the potential for tourism development, as well as management planning, staffing and budgets.

The mission was able consult with a range of stakeholders, including representatives of the Ministry of Natural Resources, the government of the Komi Republic, local authorities of Inta, the Federal Agency for Subsoil Use, the Federal Nature Supervision Agency as well as NGO representatives and representatives of indigenous communities. The presence of the Minister for Environment of the Komi Republic during an important part of the mission was a clear sign of the importance given by the authorities of the Republic to the mission. The mission conducted a two day visit to the ongoing quartz quarry at Zhelannoe and the proposed gold mining site at Chudnoe, located in the north of YVNP. A one day helicopter visit made it possible to have an overview of the southern part of the YVNP, the PL350 enclave, the Upper Illych River Basin and parts of the Pechoro-Illychsky Strict Nature Reserve (PISNR).

The mission considers that the forest ecosystem for which the Virgin Komi Forests was inscribed on the World Heritage List is overall in good condition. The mission notes however that boundary changes made to YVNP were not in accordance with the Operational Guidelines. Therefore, the excised areas are still to be considered part of the World Heritage site. The mission considers that the excisions made to the YVNP and the granting of a license for gold exploration and exploitation within the property at Chudnoe represent a clear potential threat to its Outstanding Universal Value (OUV), as defined in paragraph 180 of the *Operational Guidelines (OG)*. **The mission therefore considers that in line with paragraph 178 of the *Operational Guidelines*, the Property should be inscribed on the List of World Heritage List in Danger.**

The mission considers that proceeding with the development of a 19.9 square km mine within the World Heritage Property would have significant negative impacts on its OUV and would present a case of ascertained danger as defined in paragraph 180 of the OG. The mission stresses that any boundary modification proposal takes a holistic approach to the property's OUV and considers the outcomes of the current legal challenge.

The mission considers that the presence of the Zhelannoe quartz quarry and Obeiz sand extraction within the property is not in accordance with its World Heritage status. It acknowledges that both operations predate the property's inscription on the WH List and seem to have limited impact on the OUV of the property.

The mission further considers the lack of an eastern buffer zone and the inadequate protection status of several key forest blocks adjacent to the property, including the Upper Illych Basin, the PL 350 enclave and the Unia Basin, present a threat to the property's integrity over the medium to long-term.

In light of the above assessment the mission team considers that following immediate measures are to be taken before the 35th session of the World Heritage Committee to remove the potential danger to the Outstanding Universal Value and avoid the inscription on the List of World Heritage in Danger:

1. **Reverse the boundary change of the Yugyd Va National Park until a boundary modification is submitted by the Russian Federation** (if it so desires), and is evaluated by IUCN and considered by the World Heritage Committee;
2. **Immediately halt the mining project at Chudnoe, including all preparatory activities, and revoke or freeze the exploration and exploitation license already granted;**

In order to ensure the long term integrity of the property, the mission further recommends that the State Party before the 37th session of the World Heritage Committee:

3. Develop environmental management plans to minimise the environmental impacts of the Zhelannoe and Obeiz quarries and the SRTO-Torzhok pipeline, which pre-date inscription and are not in accordance with the property's World Heritage status, and ensure that the implementation of these plans are closely monitored by the NP's management;

The mission further recommends to implement the following additional recommendations as soon as possible, in order to further improve the integrity, protection and management of the site:

4. Establish a buffer zone with adequate protection status along the entire eastern boundary of the World Heritage property, in consultation with neighbouring regions;
5. Upgrade the protection status of the Upper Illych Basin by including it either within the Yugyd Va National Park or the Pechoro-Illychsky Strict Nature Reserve, and of the PL 350 enclave by designating it as a regional protected area;
6. Clarify the protection status of the western Yugyd Va National Park buffer zone and the role of the national park in its management as soon as possible in order to ensure the long-term integrity of the property;
7. Establish an overall management strategy and coordination mechanism for the property's two components, including the regional forest authorities in charge of the management of the Yugyd Va National Park buffer zone, the PL350 enclave and the Upper Illych Basin forest;
8. Strengthen the financial resources and staffing of the two components of the property in order to ensure that management can effectively conserve the Outstanding Universal Value of the property;
9. Develop a strategy to phase out the Zhelannoe and Obeiz quarries in collaboration with the mining companies and other stakeholders;
10. Invest in the development of ecological tourism in the property and develop a comprehensive tourism strategy for the Komi Republic focused on the Virgin Komi Forest World Heritage property; and
11. Consider addressing the issue of overall management plans, management frameworks and management standards for all natural World Heritage properties in the Russian Federation composed of federal and regional protected areas through a national law for the management of natural World Heritage properties that meets the State Party's obligations to the Convention.

The mission also recommends that the World Heritage Centre and IUCN:

12. Provide Blackrock Investment Ltd, a subsidiary of Merrill Lynch, with a copy of the ICMM international policy position on foregoing mining in World Heritage properties, and advise them in writing of the potential impacts of the proposed Chudnoe gold mine on the Outstanding Universal Value of the Virgin Komi Forests World Heritage property.

The mission further recommends that the State Party submit the following documents and information to the World Heritage Centre in one of the working languages of the Convention as soon as possible, including:

- The amended feasibility study for the proposed Chudnoe gold mine;
- A full Environmental Impact Assessment for the Chudnoe gold mining project, which meets the highest international standards and provides an assessment of the impact of the proposed mine on the property's Outstanding Universal Value;
- The existing management plans for the two components of the property, accompanied by an English summary;
- Wildlife data and trends for the property, including hunting and poaching statistics; and
- Additional information on the reported impacts of the SRTO-Torzhok pipeline and on the measures undertaken to minimize them.

1. BACKGROUND TO THE MISSION

The Virgin Komi Forests were inscribed on the World Heritage (WH) List at the 19th session of the Committee (Berlin, 1995) as one of the most important natural sites in the boreal forest region on the basis of natural criteria (iii) and (ii) (currently (vii) and (ix)).

The inscribed property covers 3.28 million ha and is composed of the Yugyd Va National Park (YVNP) to the North (1.9 million ha) and the Pechoro-Ilychsky Strict Nature Reserve (PISNR) to the South (730,000 ha), and includes the buffer zone of the PISNR (650,000 ha) (see Map 1, Annex 4). The original nomination presented by the Russian Federation included an additional 720,000 ha, namely the PL350 area which is surrounded by the National Park, the Upper Ilych River Basin situated between YVNP and PISNR, and the Unia Basin, south of the southern buffer zone of PISNR. However, these areas were not inscribed because of the lack of a proper protection status. Nevertheless the Committee in its decision to inscribe the site encouraged the State Party to upgrade the legal status of the PL 350 excision and the Upper Ilych River Basin and incorporate these areas into the property to ensure its long-term integrity (see section 3.3 further below).

The World Heritage Committee has at several times since 1995 expressed concerns to the State Party about boundary and mining issues affecting the property:

- At its 21st session (Naples, 1997), the Committee noted its serious concern over a proposal of the mining company "Terra" to exploit a gold mine in the Kozhym River Basin, within YVNP. The Committee considered that the proposed mining project posed a significant threat to the integrity of the property, and requested the State Party to provide additional information on the proposal, including any Environmental Impact Assessments (EIA).
- At its 22nd session (Kyoto, 1998), the Committee reiterated its concern over the proposed gold mining project within the Kozhym River Basin, and noted that it appeared that the boundaries of the World Heritage property were under consideration and that the proposed gold mining project may have been suspended. The Committee therefore requested the State Party to provide full information on any proposal to change the borders of the site, and to confirm whether the gold mining project had been withdrawn. During this session, the Observer Delegation of the Russian Federation confirmed that all gold mining activities had been halted and that the areas concerned were under rehabilitation.
- At its 33rd session (Sevilla, 2009), the Committee expressed serious concerns about the proposal to create a gold mining enclave within YVNP, requested the State Party not to proceed with any development that would impact on the property's Outstanding Universal Value (OUV), to comply with Paragraph 172 of the *Operational Guidelines* (OG), and to state unequivocally that no commitment had been made on mining concessions within the boundaries of the inscribed property (**Decision 33COM 7B.31**, see Annex 5).

At its 34th session (Brazilia, 2010), the Committee noted its concern that the State Party appeared to have licensed a significant open-cast gold mining operation within the YVNP, and had also excised other areas within the boundaries of the World Heritage site from YVNP. The Committee requested the State Party to restore the protected status of all areas within the property, including those areas that had been recently excised from the YVNP. The Committee further requested the State Party to invite a joint UNESCO/ IUCN reactive monitoring mission to the property, in order to review the mining threats, confirm the integrity of its boundaries, and advise on the effectiveness of its protection and management (see **Decision 34 COM 7B.25**, see Annex 5).

The mission visited the property from 3 -11 October 2010 and was composed of Guy Debonnet of the UNESCO World Heritage Centre, Marija Zupancic-Vicar representing IUCN, and Mariam Kenza Ali of the IUCN Secretariat. The terms of reference and itinerary of the mission can be found in Annexes 1 and 2. The mission focused on the Kozhym Basin located in the northern portion of the YVNP, and the question of boundary changes and mining in this area. It was able consult with a range of stakeholders, including representatives of the Ministry of Natural Resources, the government of the Komi Republic, local authorities of Inta, the Federal Agency for Subsoil Use, the Federal Nature Supervision Agency as

well as NGO representatives and representatives of indigenous communities (Annex 3). The presence of the Minister for Environment of the Komi Republic during an important part of the mission was a clear sign of the importance given by the authorities of the Republic to the mission. The mission conducted a two day visit to the ongoing quartz quarry at Zhelannoe and the proposed gold mining site at Chudnoe, located in the north of YVNP. A one day helicopter visit made it possible to have an overview of the southern part of the YVNP, the PL350 enclave, the Upper Illych River Basin and parts of PISNR.

2. INSTITUTIONAL AND LEGAL FRAMEWORK

The protected areas of the Property are governed by the national protected area legislation, in particular the federal law “On environmental protection” dating back to 1991 but updated in 2002 and federal law “On specially protected natural areas” of 1995. The first law defines standards for environmental quality, makes provisions for the protection of biota and provides a basis for federal protected areas and activities permitted in them. The protected area law regulates the organization, protection and use of protected areas. This legislation recognizes different types of protected areas such as at the federal level strict nature reserves, national parks and nature monuments and at the regional level nature parks, nature reserves and nature monuments.

The Virgin Komi Forests World Heritage site is composed of the Yugyd Va National Park (YVNP), the Pechoro-Illychsky Strict Nature Reserve, and its buffer zone. PISNR is a federal protected area with the status of a Strict Nature Reserve (“Zapovednik”), corresponding to IUCN protected area category I, benefiting from a strict protection regime with no economic uses are allowed. PISNR was established in 1930¹ and is also a biosphere reserve under the UNESCO Man and the Biosphere Programme. The PISNR buffer zone on its southern and western boundary, which is also part of the WH site, benefits from the same high protection status guaranteed under federal law. YVNP, established in 1994², is also a federal protected area with the status of National Park, corresponding to IUCN protected area category II. The national park has different zones with different land use regimes, including a number nature reserves and nature monuments. YVNP also possess a buffer zone along its western border, but established under regional law. As a result, the federal NP authorities do not have the authority to actively manage the buffer zone.

3. IDENTIFICATION AND ASSESSMENT OF MANAGEMENT AND CONSERVATION ISSUES

3.1 *Boundary modifications to the Yugyd Va National Park*

Since the property’s inscription in 1995 there have been a number of attempts to excise parts or all of the Kozhym Basin, which comprises about one third of the area of YVNP, motivated by the presence of mineral resources, including gold, in the area:

- **1997-1998:** On January 9 1997, the Head of the Komi Republic passed Decree No.1, which excised over 200,000 ha of the Kozhym Basin from the YVNP for gold prospecting and mining. Non-governmental organisations (NGOs) appealed to the public prosecutor of the Komi Republic and challenged the legality of the Decree. The Supreme Court of the Komi Republic found the Decree to be illegal and nullified it³. In parallel to the Supreme Court’s Decision, the Russian State Committee for Environmental Protection (Goskomecologiya)⁴ carried out an environmental assessment of Decree No. 1 and the ongoing gold prospecting and mining projects, and concluded that these constituted a threat to the YVNP and the World Heritage property⁵ and should be halted.

¹ RSFSR Soviet People’s Commissars Decree of 4 May 1930

² Russian Federation Decree No 377 of 23 April 1994

³ Komi Supreme Court Decision No. 319

⁴ The State Committee for Environmental Protection was at that time responsible for the management of all federal protected areas. The Committee was abolished later and its functions transferred to the Ministry of Natural Resources.

⁵ Russian State Committee for Environmental Protection Order 408 of 3 July 1998

- **2004-2005:** On April 21 2004, the Head of the Komi Republic passed Decree No. 176-p, which excised several areas from the YVNP for gold prospecting and mining operations. On November 18 2004, the Head of the Komi Republic signed a second Decree (No. 206) endorsing the new borders of the YVNP. This excision of several areas from the YVNP for gold prospecting and mining operations was again contested by NGOs with the public prosecutor of the Komi Republic. The prosecutor's office issued a ruling on May 20 2005, supporting the appeal by the NGO, which led to the Government of the Komi Republic revoking Decree No 206⁶ and restoring the borders of the YVNP.

In 2008, the Head of the Inta Urban District Municipality allocated the area of Chudnoe (19.9 square km) within Yugyd Va National Park and the Virgin Komi Forests World Heritage Property to a gold mining project (Decision No. 11/309911 of 28 November 2008). This latest attempt coincided with a "boundary clarification exercise" carried out by the Russian Federal Real Estate Cadastre Agency, as part of a national exercise to register all lands included in federal protected areas in the land cadastre. As part of this exercise, several areas were excluded from YVNP, in particular several quadrants in the northern part and a linear area in the south corresponding to the route of an existing pipeline. Map 1 (page 12) provides an overview of the revised boundaries of YVNP, which now exclude existing mines at Zhelannoe (quartz) and Obeiz (granite), the proposed gold mine site at Chudnoe, and the existing gas pipeline (SRTO-Torzok).

The Ministry of Natural Resources and Ecology of the Russian Federation legally adopted the changes to the boundaries of the YVNP on 18 January 2010.

The mission was informed by the State Party that these excisions were considered necessary as the ongoing or planned land use activities in these areas (such as mining) are not in accordance with the national park legislation of Russia. The mission was also informed that the boundary change was possible in the framework of the national legislation, as the total surface of the park as registered at the time of its creation did not diminish. In its 2010 State of Conservation report, the State Party reported that during the boundary clarification survey, the area of YVNP was found to be 2,432 ha larger than the legally registered area of 1,894,133 ha. The supplementary information submitted to the World Heritage Centre on 26 June 2009 also stated that "*as a result of the land-marking [...] the 'Chudnoe' area was recognised as located outside of the 'Yugyd Va' National Park.*"

The mission team notes that the legality of the boundary modification is currently contested at the national level, and that Greenpeace has filed an appeal with the public prosecutor of the Komi Republic, challenging the legality of Decision No. 11/309911 of 28 November 2008, which allocated the area of Chudnoe within the NP to a gold mining company. In its complaint, Greenpeace refers to an earlier decision of the Komi Supreme Court of 1997 (Decision No 319), which stated that the area of the Kozhym River Basin, where Chudnoe is located, cannot be withdrawn from YVNP as part of a boundary clarification exercise.

The mission considers that the question of the legality under national law of the boundary change is an internal matter of the Russian Federation. However, the mission notes that no boundary modification of the World Heritage (WH) property was requested to the World Heritage Committee before the change in boundaries of the national park was made. The mission stresses that this is not in accordance with the *Operational Guidelines*, which in Paragraphs 163 – 165 clearly lays out the need for any boundary change to be approved by the Committee. The mission points out that the boundary changes of YVNP cannot be considered as "a boundary clarification"⁷. As no boundary change was approved by the Committee, these areas excised from YVNP are still to be considered part of the WH property.

The mission notes that the current excisions made to the national park removed the legal protection of these areas, therefore removing the legal protection status of these parts of the WH property. This jeopardizes the protection status of the WH property, a key requirement of its OUV, in accordance with Paragraph 78 of the OG's. The mission stresses that by removing the legal status of these areas, the Russian federation pre-empted a decision by the WH Committee on a possible boundary change. The mission further notes that the OG in paragraph 180 (b) (i) clearly consider that the modification of the

⁶ Government of the Komi Republic Decree No 160 of June 28 2005

⁷ While the map which was submitted as part of the nomination is not very detailed, it clearly does not include "enclaves" in the Khozym basin. The presence of such enclaves would have definitely been noted by the IUCN evaluation.

legal protective status of a property is considered as a potential threat to its OUV and therefore the property fulfils the criteria for inscription on the List of World Heritage in Danger.

The boundary change of YVNP removes the legal protection status of part of the WH property, jeopardising the integrity of the property and presenting a potential danger as defined in the OG. Therefore the mission considers that the conditions for inscribing the property on the List of World Heritage in Danger are fulfilled.

The mission considers that the boundary change should be reversed immediately. Any boundary change to YVNP should not be implemented prior to an approval by the World Heritage Committee of a boundary modification of the WH site. In accordance with the OG, any proposed boundary change of the WH property should be submitted to the World Heritage Centre and evaluated by IUCN, based on its impacts on the OUV of the property. Based on this evaluation, it will be considered by the World Heritage Committee, which can decide to approve it, or not.

The mission considers that since this boundary modification is motivated by a proposed mining operation (see 3.2) and given its potential impact on the OUV of the property, any request for boundary modification of WH site should be considered as a “major boundary modification” and therefore, if proposed, would require a re-nomination, in line with Paragraph 165 of the Operational Guidelines.

The mission also recommends that the State Party consider the outcomes of the current legal challenge to the National Park boundaries in any discussion of the World Heritage Property’s boundaries.

3.2 Planned, ongoing and past mining within and around Yugyd Va National Park

The mission notes that the motivation for the above mentioned boundary change is in relation to existing land use pre-dating the inscription of the property on the WH list and also to accommodate a new gold mining project on the Chudnoe ridge. The current existing land use activities concerned are the extraction of granite sand in Obeiz, a quartz quarry in Zhelannoe and a gas pipeline crossing the southern part of the property (the pipeline is discussed further below in section 3.4.3). The mission was informed that these activities were present at the time of inscription, and that there has been mineral exploitation ongoing in the Khozym area of the NP since the 1930's. At the time of creation of the National Park and its nomination as a World Heritage site, several alluvial gold mines were active, but these operations were closed down after the inscription of the property on the WH List. The fact that mining existed in the area before the creation of YVNP was stressed to the mission at several occasions by the local authorities of Inta, the authorities of the Komi republic and the representative of the Federal Agency for Subsoil Use, pointing out that these activities should have been taken into account when determining its boundaries. The mission considers it is not its role to assess if all national procedures were respected during the creation of the YVNP and notes that by nominating YVNP as part of the World Heritage property, the Russian Federation took a clear commitment to the protection of its integrity within its established boundaries.

During the helicopter flyover, the mission also noted a large number of seismic lines and was informed that these date back to seismic explorations for minerals, oil and gas which took place 20 years ago.

3.2.1 Chudnoe gold mining project

As noted above, in 2008 the Head of the Inta Urban District Municipality allocated the area of Chudnoe within Yugyd Va National Park to a gold mining project. On 30 December 2009, Gold Minerals Close Corporation, obtained a license for exploration and exploitation of hard rock gold at the Chudnoe deposit (see picture 1). Gold Minerals is a subsidiary of GV Gold (Vysochayshy, OJSC), specially created to exploit the Chudnoe deposit⁸.

⁸ Information on the company can be found on its website (<http://www.gvgold.ru/en/about/default.aspx>). The mother company of GV Gold (Vysochayshy, OJSC) was established in 1998 with JSCB "Lanta-Bank" (CJSC) and OJSC "Lenzoloto" as the incorporators. According to the company website, shareholder ship was enlarged as of April 2010 with individuals and

The mission notes that at that date, the Ministry for Natural Resources had not yet adopted the boundary changes to YVNP, and therefore the licence seems to have been granted while the area was still formally included in the National Park, strengthening the impression that the boundary change of YVNP was especially motivated to regularise the new mining licence.

The mission was unable to meet with representatives of GV Gold. The Chudnoe deposit is a hard rock deposit⁹, requiring significant investment to exploit it. According to the company's website the Chudnoe deposit has an explored reserve of 2.3 T of Gold, with an additional 80.3 T of predicted resources. The mining license covers 19.9 square km, is valid until 2029. The yearly output would be estimated at 3T/year (to be reached within 5 years) and exploration drilling is scheduled to start during the second quarter of 2011. No confirmed specifications of the mine design were made available to the mission but documents on the proposed mine design in the possession of the NGO indicate that open pit mining and processing on locality is foreseen. However, according to the representative of the Federal Agency for Subsoil Use who accompanied the mission, the mine design was currently under review as part of the revised feasibility study of the project and alternative design options for the mine were currently being considered, including both underground and open-cast mining. The mission was also informed that the company is considering locating the mine's processing plant either on-site or off-site near the town of Inta, which would require transporting the ore by road through the NP and the construction of a bridge over the Kozhym River. It is unclear if the latter option is economically viable.



Picture 1: The proposed location of the gold mine at the Chudnoe, and prospecting equipment

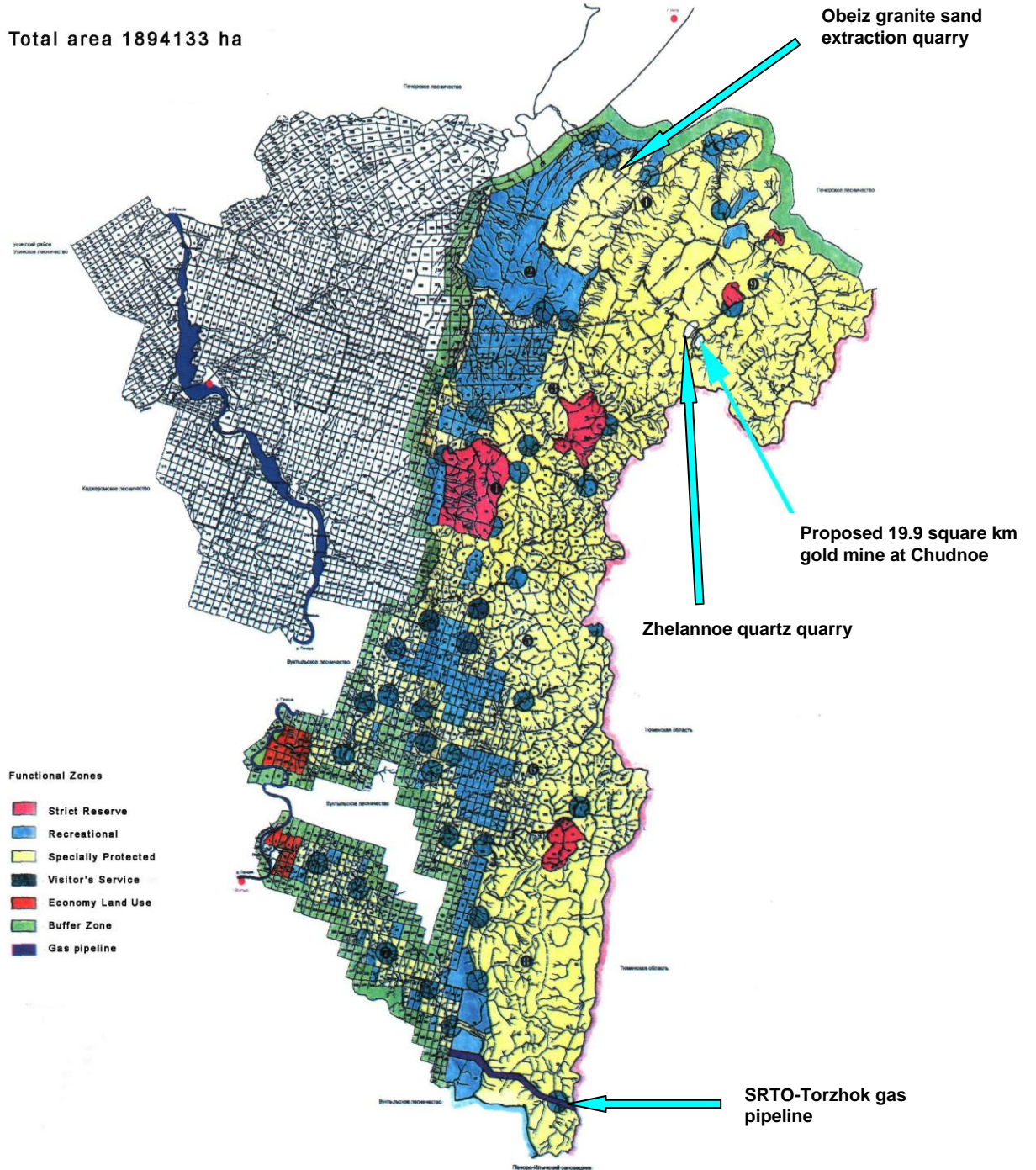
The mission considers the granting of a gold mining exploration and exploitation license could seriously affect the integrity of the northern part of the property. As no boundary modification has been submitted or approved, the licence allows for mining within the current World Heritage property. This is contradictory to the clear case law established under the Convention: at numerous occasions, the World Heritage Committee has clearly stated that mineral exploration and mining are not acceptable within WH properties.

The position of the World Heritage Committee on mining in WH sites has been supported by the International Council on Mining and Metals, regrouping all major mining companies in the world. It has also been endorsed by international investment companies such as J.P. Morgan. The mission considers that this should be brought to the attention of GV Gold, as well as to its institutional investors such as BlackRock Ltd, a subsidiary of Merrill Lynch.

companies including the international investment company BlackRock Ltd. The website also includes some information on the Chudnoe mining project

⁹ Previous gold exploitation in the site concerned alluvial deposits.

The Map of Ugyd Va National Park Zoning



Map 1: The revised boundaries and zoning of Yugyd Va National Park (Source: Transparent World)

It was not the purpose of the present mission to assess the potential impact of the proposed mining on the property. This should be done through a proper Environmental Impact Assessment (EIA) respecting the highest international standards. **However, this project which will exploit hard rock gold deposits and not alluvial gold, is a major extraction project, which is not comparable in scale and potential impacts with the on-going extraction activities of sand and quartz, nor even the alluvial gold extraction activities which existed before and were halted at the end of the nineties.**

It seems clear that a mining operation of this scale will have significant impacts on the northern part of the property. It is likely to lead to the contamination of the Kozhym River within the property, as well as more widespread environmental impacts beyond the property including knock-on effects on the Kosju River and Usa River, which is an important tributary of the Pechora River. Moreover, important infrastructure will have to be put in place (roads, bridge over the Kozhym River, base camp, open pit mine, treatment facilities for concentration of the ore, etc.) and the operation will result in increased traffic through an area which is currently only accessible in a very limited way. The negative impacts of gold mining activities within the YVNP will definitely extend beyond the 20 km square of the mining perimeter. The mission recalls that at the time of inscription, IUCN noted that gold mining activities in the Kozhym River Basin would seriously impair the values of the site.

The mission notes that in accordance with Paragraph 172 of the *Operational Guidelines*, all development projects which may affect the OUV of a property should be submitted to the Committee before a decision on their implementation is taken. State Parties should demonstrate that the activity will not impact the OUV through an appropriate appraisal process, such as an EIA. In this case, no EIA has been conducted or submitted to the WH Committee, but the licence for the mining activity has already been attributed, which is clearly not in accordance with the OG.

Without pre-empting any evaluation or decision on a possible proposed boundary modification, it seems clear to the mission team that creating a 20 km square enclave in the property to allow for mining is not a viable option in terms of the integrity of the current WH property and cannot be defended in light of the high standards of integrity and management set by the WH Convention. As mentioned above, given its potential impact on the OUV of the property, the mission considers that a request for boundary modification of WH site to accommodate this mining project should be considered as a “major boundary modification” and therefore requires a re-nomination, in line with Paragraph 165 of the Operational Guidelines.

The mission notes that NGOs representing the interests of the local indigenous population, including the Save the Pechora Committee, the Congress of the Komi people, and the Izvatas Public Movement, submitted a position paper to the mission team expressing their strong opposition to the withdrawal of the Kohzim River Basin, or any parts of this area, from the YVNP, on the basis that large-scale gold mining operations are likely to negatively impact the tundra habitat and reindeer pastures that are the basis of their traditional livelihood as reindeer breeders (see Annex 6).

The mission also notes that members of the administration of the town of Inta (current population 26,000), located close to the Kohzim Basin, expressed their support of the proposed Chudnoe gold mine as an important alternative source of employment for the economically depressed town. Inta has an economy which is heavily dependent on coal mining. However, all of the town's coal mines save one have shut down in the last 10 years, and the remaining coal mine, which provides 1640 jobs, is heavily subsidized by the government. The economic crisis created by the closure of the coal mines has forced many of Inta's residents to move to towns further south in order to find employment, resulting in a sharp population decrease in the town. Members of Inta's administration consider that the Chudnoe gold mine will provide important employment opportunities for the town's population and could provide a new economic dynamic which could stop the depopulation of the area. While the economic crisis in Inta is evident, the mission was informed that the proposed gold mine at Chudnoe is likely to create a maximum of 500 local jobs, which seems insufficient to address Inta's economic crisis over the medium and long-term or bring about the expected economic turn around.

Although the potential impacts of the proposed mine have not yet been properly assessed but based on the information presented during the mission, the mission team considers that the Chudnoe gold extraction project is likely to have significant negative impacts on the property's OUV.

The fact that a licence for these extraction activities within the Property was already given by the State Party also should be considered as a case of potential danger to the OUV of the property, in line with paragraph 180(b) (ii) of OG, fulfilling the conditions for inscription of the property on the List of World Heritage in Danger.

The mission strongly considers that until a boundary modification is requested by the State Party and approved by the Committee, and until it is demonstrated that the impacts of the Chudnoe mining project will not affect the OUV of the property, the mining project activities (including the prospecting and preparatory activities) should be immediately halted and the licence revoked or frozen.

3.2.2 Pre-existing quarries at Zhelannoe and Obeiz

The two pre-existing quarries which were operating prior to the property's inscription, and are still operating today, are Zhelannoe (optical quartz) and Obeiz (granite sand extraction). It is unclear whether the IUCN evaluation at the time was made aware of the existence of these quarries. It was explained to the mission that while all alluvial gold mining activities were shut down after the inscription on the WH List, an exception was made for these two extraction activities, given in particular the strategic importance of the quartz quarry¹⁰. The mission was informed that both quartz and granite extraction techniques cause minimal environmental impacts. In the case of the Zhelannoe quarry, quartz extraction takes place underground, further minimising the impacts of the operation on the property's OUV (see picture 2). The mission notes that due to time constraints it was not possible to visit the Obeiz granite quarry. However, the mission was informed that the Obeiz quarry is smaller than the Zhelannoe quarry, and therefore is likely to have only minimal impacts on the OUV of the property. The mission recommends that any future missions to the NP visit the Obeiz granite sand field extraction to ascertain its scale and level of impacts on the property.

The mission notes that the relatively small Zhelannoe quarry camp, which is made up of about 25 buildings, has limited impacts on the area immediately surrounding the mining camp, such as buildings, water and energy supply, heating, waste disposal. It is unclear if the camp has an adequate sewage and garbage treatment system (see picture 3). The mission was also informed that some of the lakes and rivers surrounding the camp have been overfished in the past, and that the quarry's manager has attempted to restock one of these lakes with arctic grayling over the last two years. However, the restocking efforts have not yet been successful.

The mission considers that the presence of the Zhelannoe quartz quarry and Obeiz sand extraction within the property is not in accordance with its World Heritage status. It acknowledges that both operations predate the property's inscription on the WH List and seem to have limited impact on the OUV of the property. The mission recommends that these activities are phased out. In the interim the mission team recommends that an environmental management plan is developed to minimize the environmental impacts of the Zhelannoe and Obeiz quarrying sites, and that the implementation of this plan is closely monitored by the NP's management.

3.2.3 Impacts of past alluvial gold mining

The mission was able to visit a number of former alluvial gold mining sites, including the first placer exploited in the Kozhym River Basin and Sanavog, a former alluvial gold mining operation which went bankrupt following the economic crisis in the mid-1990's and was converted into a NP base camp of about 15 buildings. The mission was informed that Sanavog is estimated to still have 44 tonnes of unexploited gold reserves.

The mission notes that past alluvial gold mining has had significant negative impacts on the Kozhym River, located within the property. The mission was informed that the Kozhym River has been 'dead' and devoid of fish for close to 10 years due to mercury contamination stemming from alluvial gold mines, and

¹⁰ It was explained to the Mission that the Zhelannoe deposit was the only high quality deposit of optical quartz in the Russian Federation.

that salmon and other fish species are only starting to return to the river. Former mining sites are still easily recognized in the landscape and devoid of vegetation. Efforts for ecological restoration apparently only had a limited success. It also demonstrates the environmental legacy left behind by companies if they close down suddenly because of economic problems.

The mission notes that since there are still alluvial gold reserves left, the opening of the mine in Chudnoe could create a dangerous precedent and incite gold exploitation in some of other remaining deposits.



Picture 2: The quartz quarry at Zhelannoe, which pre-dates the property's inscription on the World Heritage List (Kozhym Basin, Yugyd Va National Park)



Picture 3: The quarry camp at Zhelannoe (Kozhym Basin, Yugyd Va National Park)

3.3 Other issues related to the property's boundaries

3.3.1 Buffer zone

As mentioned above, the situation in terms of buffer zones of the property is somewhat confusing.

The YVNP component of the property has a buffer zone established on its western boundary, with no clear protection status and is managed by the regional forest service. This buffer zone is not part of the property.

The mission recommends that the protection status of the western YVNP buffer zone and the role of the national park in its management should be clarified as soon as possible in order to ensure the long-term integrity of the property.

The PISNR has a buffer zone on its western and southern boundary which has federal protection status similar to the Reserve and is managed by the staff of the Reserve¹¹. This buffer zone is actually included in the World Heritage property.

The mission further notes that there is no buffer zone along the eastern boundary of the WH property (see Map 2, page 18). The mission was informed that geological survey work is already ongoing in the areas to the east of the property in the neighbouring regions, and gold mining and other mineral concessions may be attributed in the near future in areas immediately adjacent to the property's boundaries.

The mission strongly recommends that a buffer zone with appropriate protection status along the entire eastern edge of the property should be established as soon as possible to ensure the long-term integrity of the property.

It is important to note that the eastern boundary of the WH property coincides with the eastern boundary of the Komi Republic and therefore this buffer zone will have established on the territories of the neighbouring entities Yamalia Nenets Autonomous Region and Khantia Mansia Autonomous Region

3.3.2 PL350 enclave, Upper Ilych Basin and Unia Basin

The mission also reviewed the status of a number of areas which were included in the original nomination, but which were not recommended for inclusion by IUCN because of their inadequate protection status. As mentioned above, at the time of inscription, the WH Committee recommended to upgrade the protection status of these areas with a view to include them in the property. The areas concerned include the PL350 enclave adjacent to the YVNP, the Upper Ilych Basin, which separates the national park from the strict nature reserve, and the Unia Basin to the south of the strict nature reserve (see Map 2, page 18). They are currently managed as state forests by the forest department of the Komi republic. While no logging is taking place in these areas for the moment, it is in principle possible that commercial logging would be granted in them by the Komi forest department, despite their evident strategic importance for the long-term integrity of the property.

¹¹ The mission notes that the buffer zone of the PISNR, originally established in 1992, was abolished in 2004¹¹ in order to lease the area for logging. This happened at a time where the regional government had the legal control over the PISNR buffer zone. The buffer zone was later reinstated in 2006¹¹, following an NGO appeal to the public prosecutor of the Komi Republic. Changes in the federal legislation in 2004, which brought the control over the buffer zones of Strict Natures Reserves back under the federal authorities, should avoid similar problems in the future



Picture 4: Aerial view of the Upper Illych Basin and the Illych River

The PL350 enclave was included in the nomination but excluded from the inscription as it had no protection status. During a helicopter flyover, the mission team noted that several parts of the area were logged before the creation of the park, but since the 1990's no logging or other economic activities have taken place.

The mission considers that it is important to give a protection status to this area to enhance the integrity of the property, either by including it in the buffer zone of YVNP with the status of a regional protected area or if possible by including it in YVNP.

The mission was also able to assess the forests of the Upper Illych Basin, which separate the national park from the reserve, by helicopter (see picture 4). The area is strategically situated between the two components of the property, YVNP and PISNR. The IUCN evaluation mission before the inscription noted already its importance for the overall integrity of the property. As with PL350, this area was included in the nomination but excluded from the inscription as it had no protection status. During the flight over the area, the mission noted that the area consists of intact primary forest and did not observe any signs of human disturbance. A similar undisturbed forest block is said to exist to the south of the PISNR in the Unia Basin, however due to logistical constraints the mission team was not able to fly over this area. The mission recommends that any future missions to the property should visit this area to ascertain its state of conservation.

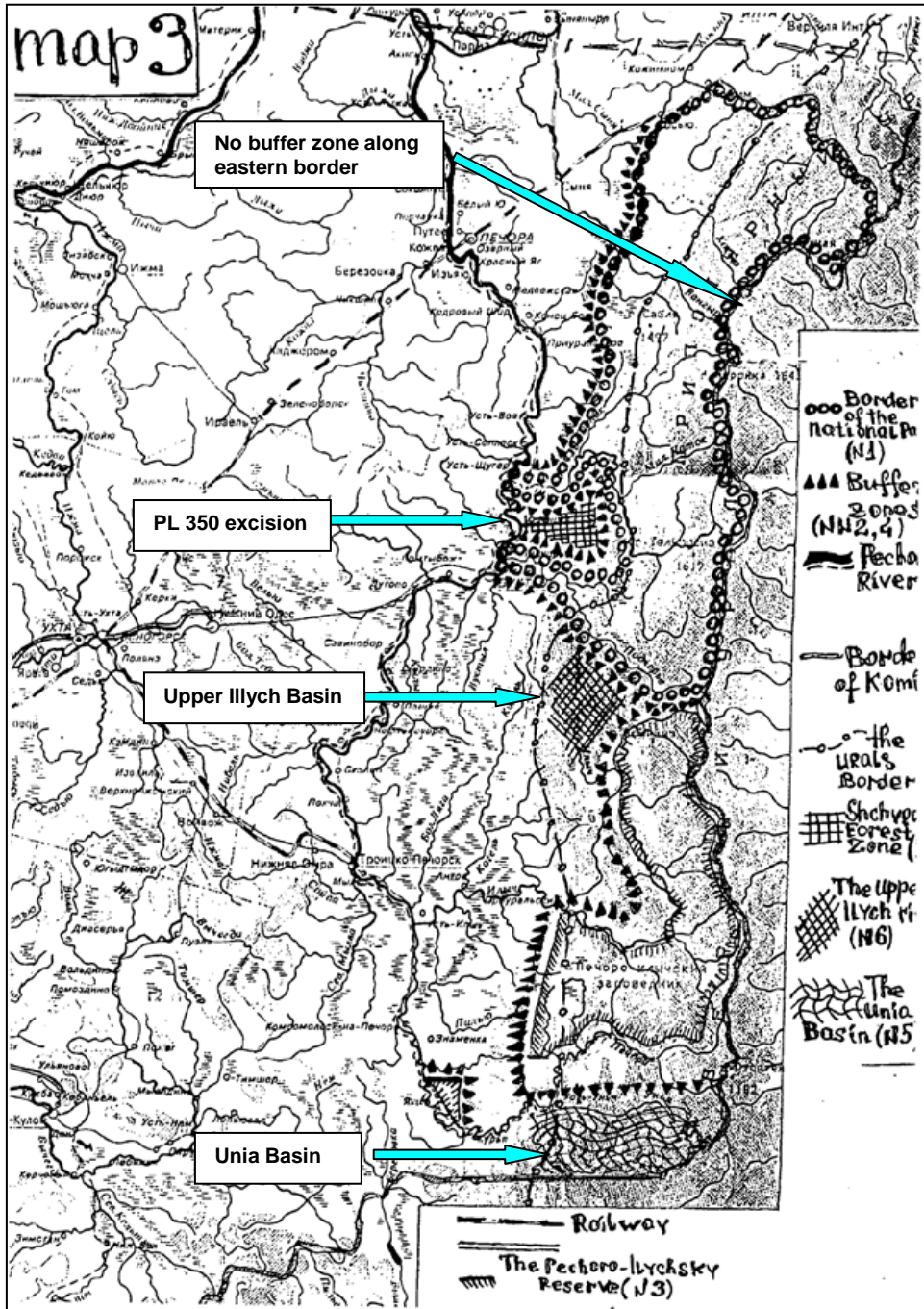
The mission considers that it is crucial that the Upper Illych Basin should be included in either the YVNP or the PISNR. This would connect the two components of the property, strengthening its overall integrity, and would add a large tract of undisturbed boreal forests to the property.

3.4 Other conservation issues

3.4.1 Hunting, poaching and illegal access

The mission was informed that the most common infractions within the YVNP are poaching and illegal access. There were 45 infractions in the YVNP in 2009 and 50 in 2010, including poaching of arctic grayling and salmon. YVNP staff carry out joint raids with the police to address these issues. Penalties for infractions are very low and probably not dissuasive¹². In 2009, YVNP initiated 32 prosecutions, including 6 for poaching. The PISNR management informed the mission that poaching of large mammals occurs along the western boundary of the SNR, but not within its borders. Between 2006-2010, the PISNR recorded 62 infractions, including 45 related to lack of appropriate visitation permits, 13 related to illegal fishing and 4 to illegal gathering of wild plants.

¹² Penalties amount to 2000 rubles for individuals (approximately 65 US\$), 4000 rubles for government staff (approximately 130 US\$) and 60,000 rubles (approximately 1900 US\$) for legal entities.



Map 2: PL 350 excision, Upper Illych Basin and Unia Basin
 (Source: Nomination File)

In spite of its request, the mission was not provided with data on the wildlife populations in the property, although monitoring was said to be carried out in both components. The mission notes that UNDP strategy document for the ongoing project on “*Strengthening Protected Area System of the Komi Republic to Conserve Virgin Forest Biodiversity in the Pechora Headwaters Region*” reports that while poaching of wild fur animals (e.g. marten, ermine and squirrel) has decreased in the Komi Republic due to a drop in procurement by state-owned fur enterprises, the populations of wild elk and reindeer have decreased from 31,500 to 14,500 and 1,500 to 500, respectively, but it is not clear if this general situation is representative for the property.

The mission team regrets it was not able to review data on wildlife populations and therefore was unable to fully assess the impacts of hunting and poaching on the property. The mission recommends that the State Party provide additional wildlife data, as well as hunting and poaching statistics, in its next State of Conservation report.

3.4.2 Logging

The mission was informed that no logging occurs within the property and that there is no active logging within the PL350 enclave, the Upper Illych Basin and the Unia Basin, which are key to maintaining the property’s long-term integrity. During the helicopter flyover of the Upper Illych Basin and PL350, the mission did not observe any recent or active logging.

The UNDP strategy document for the ongoing project on “*Strengthening Protected Area System of the Komi Republic to Conserve Virgin Forest Biodiversity in the Pechora Headwaters Region*” notes that illegal logging in the Komi Republic is extremely rare, “...accounting for less than 1% of harvested volume.” The mission notes that at the time of inscription, logging was a major logging threat to the property’s southern buffer zone. At that time, a number of logging concessions were sought by a French company, covering close to 2 million ha of virgin forest. The mission recalls that the boundaries of the PISNR were also amended in the 1950’s to allow logging in the upper Pechora basin, which had adverse impacts in the immediate vicinity of the property.

The mission considers that logging is not a current threat to the property. In order to avoid problems with logging in the future, the mission strongly recommends to upgrade the protection status of the PL350 enclave, the Upper Illych Basin and potentially the Unia Basin, to clarify the protection status and management of the YVNP buffer zone, and to establish an adequate buffer zone along the property’s eastern and northern boundaries.

3.4.3 SRTO-Torzhok gas pipeline and Podcherie-Vuktyl drinking water pipeline

The SRTO-Torzhok gas pipeline pre-dates the property’s inscription and runs along its southern edge upstream of the Pechora River’s tributaries (see Map 1, page 12). Due to logistical constraints the mission was unable to visit the location of the pipeline. The mission was informed about the very good cooperation with Gazprom, the company operating the pipeline, and the regular monitoring of the pipeline by the company. According to the park authorities, the pipeline has no environmental impacts on the property. The UNDP strategy document for the ongoing project on “*Strengthening Protected Area System of the Komi Republic to Conserve Virgin Forest Biodiversity in the Pechora Headwaters Region*” notes that “...the lack of anti-erosion protection of the pipeline and negligence regarding environmental requirements have already led to sedimentation on the river floors...”, referring to the Pechora River tributaries that are important for the reproduction of several sub-species of Pechora’s Atlantic salmon stocks.

The mission was not able to visit the Podcherie-Vuktyl drinking water pipeline, but notes that it pre-dates inscription and is unlikely to have significant negative impacts on the property’s values.

The mission was informed that the construction of the new gas pipeline to the north of the property was originally planned inside the site but that it was diverted outside its boundaries. However construction works apparently took place during salmon spawning season, thereby disrupting their reproductive cycle.

The mission notes that a power line in the north of the property, which predates inscription, was also excised from the NP during the boundary modification exercise.

The mission notes that the SRTO-Torzhok pipeline, which pre-dates inscription, is not in accordance with its World Heritage status and is reported to have some negative impacts through erosion, which could be addressed by appropriate anti-erosion measures. The mission recommends that the State Party provide additional information on the reported impacts of the SRTO-Torzhok pipeline, develop an environmental management plan to minimize its environmental impacts, and ensure that the implementation of this plan is closely monitored by the NP's management.

3.4.4 Fires

During a helicopter flyover of the southern part of the NP and the PISNR, the mission observed a number of areas that had been visibly affected by fire and regenerated (see picture 5 below). In 2010, forest fires in the PISNR affected roughly 100 ha in the northern and central parts of the SNR and 0.1ha in the buffer zone. These fires were fought by 4 staff and a helicopter provided by the Syktyvkar fire service. The UNDP strategy document notes that between 2001-2005 fires of natural origin affected 127 ha of the PISNR.



Picture 5: Forest regeneration following forest fires

No fires have been reported in the YVNP for the last four years. The mission was informed that the YVNP has agreements with stakeholders around the park, including Gazprom, to assist the NP in fighting forest fires when necessary, and that these agreements are renewed annually. The mission was also informed that Gazprom's surveys for fires when it monitors the SRTO-Torzhok gas pipeline.

The mission team was informed that the NP and Reserve have access to satellite imagery to help fight fires, and that protected areas in the Komi Republic will receive 33 million roubles in governmental funding for fire fighting in 2011.

The mission notes that natural forest fires are a normal part of the ecology of taiga boreal forests. Natural climax vegetation in the taiga ecosystem (so called dark taiga) is relatively species poor and disturbance by natural fires is an essential element, allowing for regeneration and rejuvenation of the forest ("green taiga") and creating patches of younger forest important for the fauna. However, there is concern that climatic change could lead to more frequent and more intense fires, impacting negatively on the ecosystem. The mission notes that the property is one of the largest undisturbed boreal forests in the world and could be a very interesting area to monitor the impacts of climate change on the taiga ecosystem.

3.5 Management planning, staffing and budgets

According to the *Operational Guidelines*, World Heritage properties should have appropriate management plans or other documented management system to ensure the protection of the property. While both components of the property have management plans, there is no overall management strategy for the property.

The mission recommends that an overall management strategy and coordination mechanism between its two components be developed, also including the regional forest authorities in charge of the management of the YVNP buffer zone, PL350 and Upper Illych Basin forest. The mission requested but did not receive copies of the existing management plans for the YVNP and the PISNR. The mission recommends that these be submitted to the World Heritage Centre for review and accompanied by an English summary.

The mission was also informed that the YVNP adopted new zoning regulations in 2010 (see Map 1, page 12). These include strict reserve zones where no economic activity or tourism is permitted, recreational zones, specially protected zones which allow traditional livelihoods such as reindeer breeding, visitor service areas (e.g. base camps), economic land use zones which allow berry and mushroom picking as well as firewood gathering for local settlements, buffer zone and a gas pipeline zone.

The YVNP has 44 staff spread across three offices in Pechora (7 staff), Vuktyl (29 staff) and Inta (6 staff). In addition, park management occasionally employs local people to build and maintain trails, particularly during the tourism season. Park authorities also have developed a number of agreements with local stakeholders, including Gazprom, who support the park by providing funds and in-kind assistance for visitor centres, roads, helicopter flights, and building materials for park infrastructure. The mission was informed that the YVNP 2010 budget amounts to 20 million roubles (approximately 650,000 USD), including salaries and has increased over the last years. 5 million roubles are generated by the NP, through entrance fees, booklets and souvenirs. The budget includes contributions of 500,000 roubles from Gazprom, the NP's most important stakeholder, and 900,000 roubles from the UNDP-GEF project in the Komi Republic. The mission was informed by park management that 60 million roubles in total would be required to adequately manage the 1.9 million ha of the NP and its buffer zone (see Table 1 further below)..

The PISNR has 71 staff, including 16 scientific staff and 26 rangers. The average staff age is around 55: the youngest staff is 45, while the oldest is 78. The PISNR's budget is 15.9 million roubles (approximately 500,000 USD, which mainly covers salaries with 2 million roubles remaining for implementing management measures (see Table 2 further below).

Table 1: Budget and staffing of the Yugyd Va National Park and the Pechoro-Illychsky Strict Nature Reserve in 2010. (sources: Tatiana Tyupenko, Director of Yugyd Va National Park, and Alexey Yakushev, Director of the Pechoro-Illychsky Strict Nature Reserve)

	Yugyd Va National Park	Pechoro-Illychsky Nature Reserve
Management Plan	2008-2013 (the YVNP is also drafting Business Plan)	Currently being updated (the PISNR also has a Business Plan)
Budget	20 million roubles or about 700,000 USD (5 million of this budget is generated by the NP, through entrance fees, booklets and souvenirs)	15.9 million roubles or about 500,000 USD
Staff	44 (25 rangers, 7 environmental education and tourism staff, 7 technical staff, 3 accounting staff, 2 scientists)	71 (including 16 scientific staff and 26 rangers)
Area	1.9 million ha (excluding buffer zone)	730,000 ha (excluding buffer zone)

Table 2: Budget, staffing and residents of the Pechoro-Illychsky Strict Nature Reserve between 2006-2010. (source: Alexey Yakushev, Director of the Pechoro-Illychsky Strict Nature Reserve)

Financing (thousand rubles)	2006	2007	2008	2009	9 months 2010
Total	9,367.6	10,862.0	13,814.5	18,033.7	15,904.5
Including: Federal Budget; sources of foreign grants; sponsors' sources; income from own activities	8,902.6	10,319.5	12,914.7	15,881.7	14,903.6
	296.5	451.4	716.8	1,735.9	363.4
	168.5	91.1	183.0	260.1	463.1
				156.0	174.4
Number of staff	73	74	74	77	71
Residents inside the Nature Reserve boundaries, total, including Reserve staff and their family members	15	15	14	13	13
	11	12	12	12	12

The mission notes that a UNDP/ GEF project entitled “*Strengthening protected area system of the Komi Republic to conserve virgin forest biodiversity in the Pechora River headwaters region*” (2009-2013) is currently active in the Komi Republic. The mission was informed that the project’s budget is 5 million USD over 3 years and that its aims are to: 1) restructure the protected area network of the Komi Republic in order to increase coverage of taiga, tundra and forest tundra ecosystems; 2) increase the institutional capacity of the Republic to manage the protected area network; and 3) diversify the revenue base of the protected area system through the application of business planning principles. The mission was also informed that most funding is focussing on the regional protected areas managed by the Komi Republic with only limited funding going to the two federal protected areas that are part of the Property¹³.

The mission was impressed with the high standards and capacity of management in spite of the very limited budget and staffing on the YVNP and the PISNR and strongly recommends that the Ministry strengthen the financial resources and staffing of the property in order to further strengthen the management of the property.

3.6 Tourism development within the Property

The mission was informed that important efforts have been undertaken since the property’s inscription to develop tourism in the property, and specifically in the YVNP, supported by a tourism development project funded by the Nordic Council of Ministers (2006-2009). These include the development of ecotourism hiking and rafting routes, the development of basic lodging infrastructure (cabins and camp sites) and the development of communication materials (booklets, website, etc.). Currently, about 4000 people per year visit the YVNP, including 81 foreigners in 2010. There are visitor centres in all three NP offices, however the visitor centre in Vuktyl is the most developed, as most tourists enter the NP through Vuktyl due to its proximity to the NP. The mission was also informed that a large visitor centre is being built in Pechora. The mission understands that there are currently no regional tourism outfitters.

Between 2006 and 2010, 2,231 tourists visited the PISNR. The number of tourists over this time period increased from 293 in 2006 to 564 in 2010. The most frequently visited site within the reserve is the Manpupuner Plateau and stone pillars (see picture 6 below).

¹³ To date, the YVNP received 1,660,000 roubles from the UNDP/ GEF project, or about 55,300 USD, for a number of activities, including the organisation of a management seminar, production of photographs, tour guide training, and funding for three snowmobiles.



Picture 6: *The Manpupuner Plateau and stone pillars*

The mission considers there is important potential to further develop ecological tourism in the property without adversely impact its OUV. It notes that the unique visitor experience is related to the pristine nature and wilderness of the area. This should be taken into account when planning further developments as further development of mining in the northern part of the property would close off this economic opportunity for the northern region as mining would be excluding ecological tourism.

The mission acknowledges the important challenges in terms of accessibility and poor infrastructure which hamper this development, but notes that with a relatively small investment it should be possible to boost tourism and generate important benefits to the local communities living on the boundary of the site and the indigenous communities in the site.

The mission strongly recommends that a comprehensive tourism strategy for the Komi Republic be developed, with the Virgin Komi Forest World Heritage property at its centre.

4. ASSESSMENT OF THE STATE OF CONSERVATION OF THE PROPERTY

The Virgin Komi Forests nomination, as prepared by the Russian Federation, proposed the designation of the property under the previous criteria (i) and (ix), currently (viii) and (x) respectively. The Committee, decided to inscribe the property under the previous criteria (ii) and (iii), currently (ix) and (vii) respectively, on the basis of IUCN's evaluation.

The mission considers that the property's OUV does not fully reflect criteria (vii) as currently defined, i.e. "contains superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance." However, the mission notes that the 1992 definition of criteria (ii) referred to "...outstanding examples of the most important ecosystems...", which adequately reflects the property's OUV.

There is currently no Statement of Outstanding Universal Value for the property. On the basis of IUCN's evaluation and the 1992 definition of criteria (ii), the mission proposes the following justifications for criteria (vii) and criteria (ix):

(vii) Outstanding example of the most important ecosystems containing areas of exceptional natural beauty. *The Virgin Komi Forests are one of the top five boreal forest ecosystems, as well as the largest block of undisturbed boreal forest in Europe. They contain areas of exceptional natural beauty, including the Manpupuner Plateau Stone Pillars, which rise above an undisturbed view of virgin forest on all sides.*

(ix) Outstanding example representing significant ongoing ecological processes in the evolution and development of terrestrial ecosystems. The VFK contain a vast expanse of conifer, aspen and birch forests and wild rivers which provide a significant habitat for threatened flora and fauna. They are characterized by their large size, natural condition and the transition interface between boreal forest and arctic tundra.

The mission found that the forest ecosystems for which the Virgin Komi Forests were inscribed on the World Heritage List were overall in very good condition, particularly in the PISNR and the southern portion of the YVNP. The overall integrity of the vast majority of the property can be considered excellent. However, while the forest ecosystems are intact and there is very little evidence of impacts from human activity, the status of wildlife populations is unclear.

The mission stressed that there are important fundamental issues vital to the long-term conservation of the property's OUV and its integrity. These relate directly to the legal status of the property's buffer zone and of several key areas adjoining the property, in particular:

- a) the inadequate protection status of the Upper Illych Basin and the PL350 enclave;
- b) the inadequate protection and management status of the NP buffer zone; and
- c) the lack of a buffer zone along the entire eastern boundary of the property, in particular in view of the gold and other mineral concessions that may be attributed in the near future in areas immediately adjacent to the property's eastern edge.

The mission notes that the current excisions made to the national park removed the legal protection of these areas, therefore removing the legal protection status of these parts of the WH property. In addition a licence to explore the gold deposits in these areas, which are still to be considered as part of the World Heritage property, was already attributed. Both these facts present a potential danger to the OUV, in accordance with Paragraph 180 of the Operational Guidelines. The mission stresses that World Heritage boundaries should not be modified solely to allow mining and other damaging activities, and considers that the granting of a license for gold exploration and exploitation within the property represents a potential threat to the property's OUV.

In the event that the Russian Federation chooses to propose a major boundary modification to the property through a re-nomination, the mission considers that any proposed boundary modification should be based on a holistic vision of the OUV of the property, supporting the values for which the site is inscribed and its overall integrity and taking into account the above mentioned issues.

5. CONCLUSIONS AND RECOMMENDATIONS

The mission concludes that while the forest ecosystem for which the Virgin Komi Forests was inscribed on the World Heritage List is overall in good condition, the excisions made to the NP jeopardise its protection status, and the granting of a license for gold exploration and exploitation within the property represents a potential threat to its OUV. Moreover, the lack of an eastern buffer zone and the inadequate protection status of several key forest blocks adjacent to the property, including the Upper Illych Basin, the PL 350 enclave and the Unia Basin, present a threat to the property's integrity over the medium to long-term.

The mission considers that the OUV for which the property was inscribed on the List is under potential danger as defined in para 180 of the OG, as a result of the boundary modification of UVNP, which removed the legal protection of part of the property, and the fact that an licence to exploit the gold reserves within these areas was already attributed. The mission therefore considers that in line with para 178 of the OG, the Property should be inscribed on the List of World Heritage List in Danger.

The mission considers that proceeding with the development of a 19.9 square km mine within the World Heritage Property would have significant negative impacts on its OUV and would present a case of ascertained danger as defined in para 180 of the OG. The mission stresses that any

boundary modification proposal takes a holistic approach to the property's OUV and considers the outcomes of the current legal challenge.

In light of the above assessment the mission team considers that following immediate measures are to be taken before the 35th session of the World Heritage Committee to remove the potential danger to the Outstanding Universal Value and avoid the inscription on the List of World Heritage in Danger:

1. **Reverse the boundary change of the Yugyd Va National Park until a boundary modification is submitted by the Russian Federation** (if it so desires), and is evaluated by IUCN and considered by the World Heritage Committee;
2. **Immediately halt the mining project at Chudnoe, including all preparatory activities, and revoke or freeze the exploration and exploitation license already granted;**

In order to ensure the long term integrity of the property, the mission further recommends that the State Party before the 37th session of the World Heritage Committee:

3. Develop environmental management plans to minimise the environmental impacts of the Zhelannoe and Obeiz quarries and the SRTO-Torzhok pipeline, which pre-date inscription and are not in accordance with the property's World Heritage status, and ensure that the implementation of these plans are closely monitored by the NP's management;

The mission further recommends to implement the following additional recommendations as soon as possible, in order to further improve the integrity, protection and management of the site:

4. Establish a buffer zone with adequate protection status along the entire eastern boundary of the World Heritage property, in consultation with neighbouring regions;
5. Upgrade the protection status of the Upper Illych Basin by including it either within the Yugyd Va National Park or the Pechoro-Illychsky Strict Nature Reserve, and of the PL 350 enclave by designating it as a regional protected area;
6. Clarify the protection status of the western Yugyd Va National Park buffer zone and the role of the national park in its management as soon as possible in order to ensure the long-term integrity of the property;
7. Establish an overall management strategy and coordination mechanism for the property's two components, including the regional forest authorities in charge of the management of the Yugyd Va National Park buffer zone, the PL350 enclave and the Upper Illych Basin forest;
8. Strengthen the financial resources and staffing of the two components of the property in order to ensure that management can effectively conserve the Outstanding Universal Value of the property;
9. Develop a strategy to phase out the Zhelannoe and Obeiz quarries in collaboration with the mining companies and other stakeholders;
10. Invest in the development of ecological tourism in the property and develop a comprehensive tourism strategy for the Komi Republic focused on the Virgin Komi Forest World Heritage property; and
11. Consider addressing the issue of overall management plans, management frameworks and management standards for all natural World Heritage properties in the Russian Federation composed of federal and regional protected areas through a national law for the management of natural World Heritage properties that meets the State Party's obligations to the Convention.

The mission also recommends that the World Heritage Centre and IUCN:

- 12 Provide Blackrock Investment Ltd, a subsidiary of Merrill Lynch, with a copy of the ICMM international policy position on foregoing mining in World Heritage properties, and advise them in

writing of the potential impacts of the proposed Chudnoe gold mine on the Outstanding Universal Value of the Virgin Komi Forests World Heritage property.

The mission further recommends that the State Party submit the following documents and information to the World Heritage Centre in one of the working languages of the Convention as soon as possible, including:

- The amended feasibility study for the proposed Chudnoe gold mine;
- A full Environmental Impact Assessment for the Chudnoe gold mining project, which meets the highest international standards and provides an assessment of the impact of the proposed mine on the property's Outstanding Universal Value;
- The existing management plans for the two components of the property, accompanied by an English summary;
- Wildlife data and trends for the property, including hunting and poaching statistics; and
- Additional information on the reported impacts of the SRTO-Torzhok pipeline and on the measures undertaken to minimize them.

Annex 1. Terms of Reference

Reactive Monitoring Mission Virgin Komi Forest World Heritage property Russian Federation, October 2010

The objective of the monitoring mission is to undertake an assessment of the State of Conservation of the Virgin Komi Forest World Heritage property, as requested by the World Heritage Committee at its 34th session (Decision 34OM 7B.25). The mission will assess the factors affecting the Outstanding Universal Value of the property and in particular review the reported threats to the integrity of the property as well as its current status of management and protection. The mission team will be composed of Guy Debonnet of the World Heritage Centre, Marija Zupancic-Vicar, IUCN expert and Mariam Kenza Ali of the IUCN secretariat..

In particular, the mission should assess the following key issues:

- a) Assess the protection status of the property, and in particular the reports received by the World Heritage Committee on changes to the boundaries of the Yugyd Va National Park, including the excision of part of an area from the National Park to create an enclave for gold mining;
- b) Assess the status of on-going planned and past mining operations inside and in the immediate vicinity of the property and their direct and indirect impact on the Outstanding Universal Value, in particular the mining activities in the Chudnoe area as well as mining of sand fields in Zhelannoe, Obeiz and Skyviu;
- c) Assess the impacts of other infrastructure and other resource extraction activities in and in the immediate vicinity of the property, such as the SRTO- Torzhok gas pipeline;
- d) Review the status of logging activities around the property, the status of hunting and poaching and the available data on wildlife populations in the property as well as any other threats affecting the Outstanding Universal Value;
- e) Review the current protection status of the forest included in the original nomination, which was not included in the property because of their insufficient protection status, but was recognized as important to the integrity of the property, in particular the upper Illych River basin, as well as the LP350 excision. At the time of inscription, the Committee recommended to upgrade the legal status of these areas in order to incorporate them into the property.
- f) Review the management effectiveness of the different components of the property (Pechoro Illychsky Strict Nature Reserve and buffer zone and the Yugyd-Va National Park), in particular the existence and implementation of management plans, available staffing and budgets of the management authority and their capacity to effectively conserve the Outstanding Universal Value of the property.

The mission team should be able to conduct the necessary field visits to the property to make these assessments, and in particular visit the areas mentioned above. The mission team should further hold consultations with the Russian authorities at federal, regional and local levels, in particular the management authority as well as all relevant other stakeholders, including the companies involved in the different activities as well as representatives of local communities and local and national NGO, including Greenpeace and the "Save Pechora Committee".

Based on the results of the above mentioned assessment and discussion with the State Party representatives, the mission team will develop recommendations to the Government of the Russian Federation and the World Heritage Committee to conserve the OUV of the property and improve its conservation and management.

The mission team will prepare a concise mission report in English on the findings and recommendations of this Monitoring Mission following the standard format.

Annex 2. Itinerary and programme

Programme for the Joint WHC-IUCN Mission to Virgin Komi Forests 3-11 October 2010

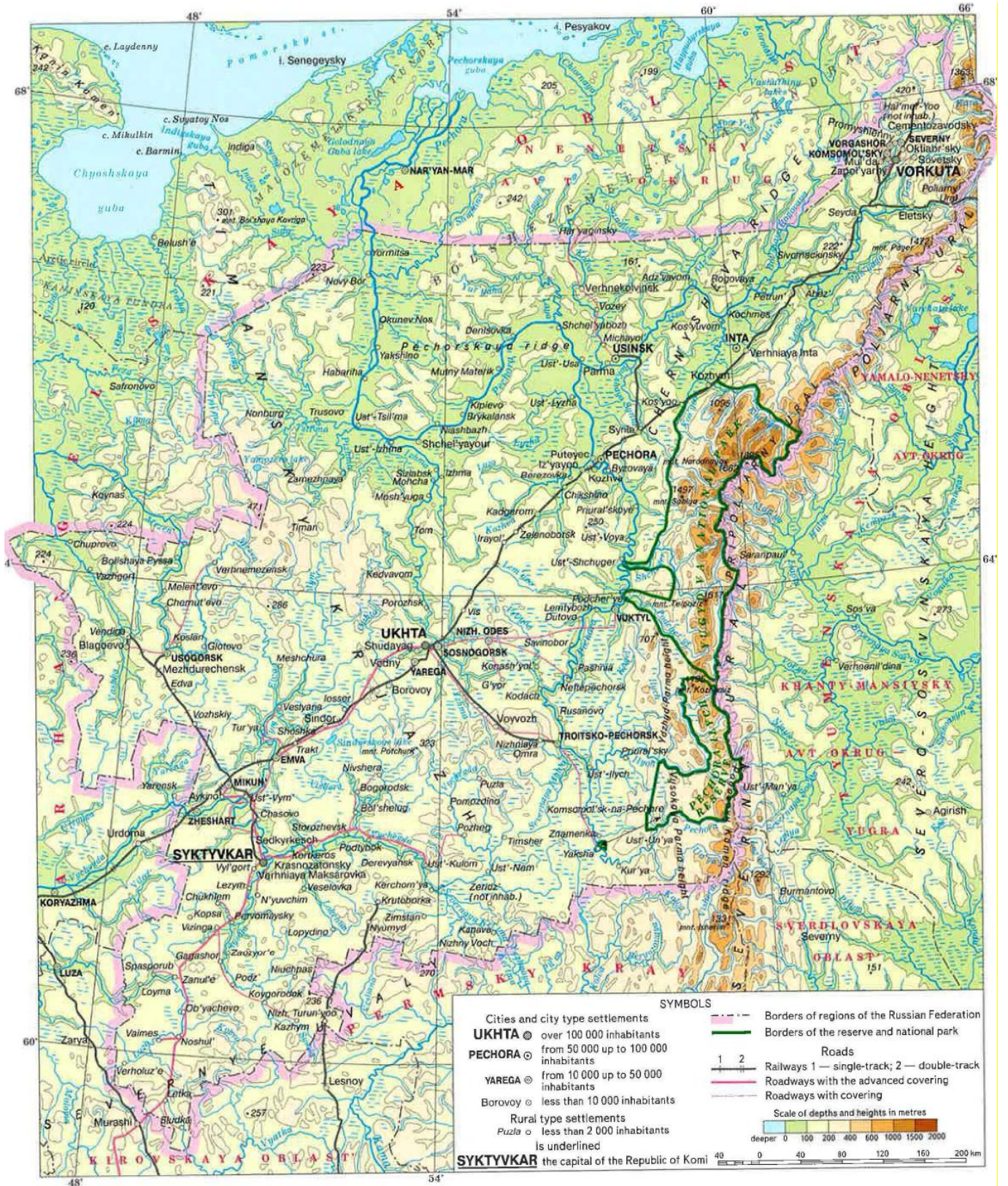
3 October	
	<p>Arrival of UNESCO/IUCN delegation to Moscow</p> <p>Pick up in the airport</p> <p>Accommodation in the hotel in Moscow</p>
4 October	
	<p>Departure of UNESCO/IUCN delegation from Moscow to Ukhta flight UT-383 11:30, airport Vnukovo</p> <p>Arrival in Ukhta 13h40; lunch in Ukhta</p> <p>Transfer to Inta (by train, duration - 8 hours) departure time 17:02, arrival time Inta 01:25</p> <p>Accommodation in the hotel of Inta</p>
5 October	
10.00-14.00 National park Ugyd va Office, Inta	Working meeting (with participation of Ministry of Natural Resources and Environment, Rosprirodnadzor, Agency on Subsoil Management, national park Yugyd Va, Pechoro-Ilych Reserve, Greenpeace, Save the Pechora Committee
14.00-15.30	Lunch
17.00- 01.00	Travel to "Zhelannoe" station in the Yugyd Va National Park by truck (8 hours drive plus stops, 136 km) Night at "Zhelannoe" station
6 October	
10.00 – 15.00	Visit of the Chudnoy range where the gold mining is planned, visit of the Zhelanoy quartzite mining station, visit of former alluvial gold mining areas
17.00 – 19.00	Meeting to discuss various issues
7 October	
10.00 – 20.00	Return to Inta by truck. Visit of former gold mining camp at Sana-vozh, visit to an indigenous Komi non permanent settlement, visit of tourism infrastructure, various stops along the road to see the northern part of the property
23.30 – 07.50	Transfer by night train from Inta to Ukhta (train 041M, departure time 23:35, arrival time 07.48)
8 October	
08.00	Arrival in Ukhta, transfert to Airport
09.00 – 13.00	Visit of southern part of Yugyd Va national park by helicopter: Shugor river, PL 350 enclave, Podcherye river. Landing in Vuktyl for refueling and lunch
14.00 – 19.00	Continuation helicopter visit: visit of upper Ilych river forest block, visit of Pechora – Ilych reserve: visit of gard post on the Ilych river, visit of geological monuments in the Ural part of the Reserve
	Night in hotel in Ukhta
9 October	

	Departure from Ukhta to Moscow UT-384 16:00, arrival to airport Vnukovo) Arrival to Moscow; accommodation in the hotel in Moscow
10 October	
	Report and recommendation preparation by mission team
11 October	
10.00 Moscow	Meeting in the Ministry of Natural Resources and Environment of the Russian Federation to discuss results of the mission
	Transfer to the airport

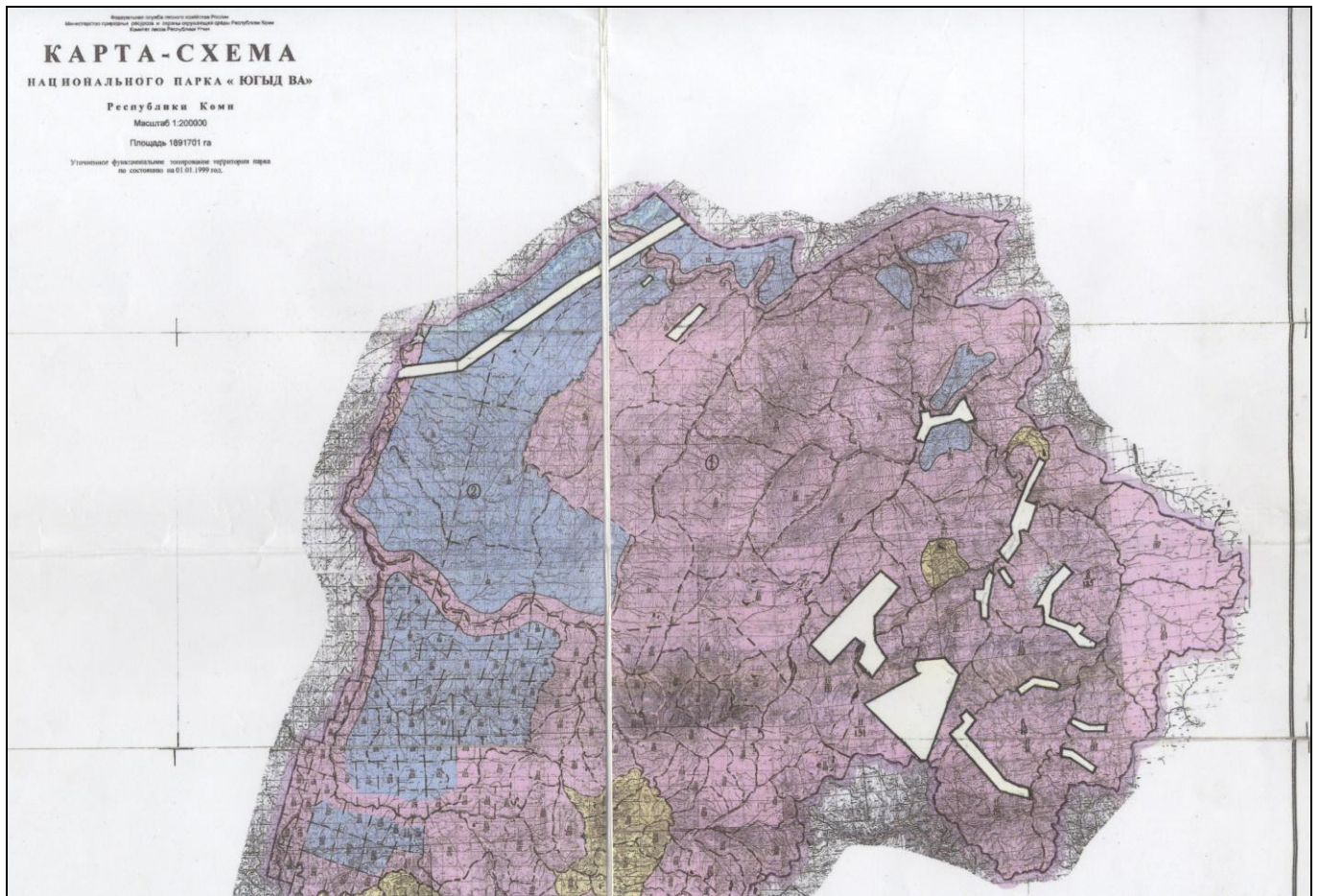
Annex 3. Mission participants list

Name	Organisation
Guy Debonnet	UNESCO
Marija ZUPANCIC-VICAR	IUCN
Mariam Kenza ALI	IUCN
Marina Nekipelova	The Minister of natural recourses and environmental protection of the Komi Republic
Mikhail Tarbaev	The Head of Regional Department of the Federal Agency for Subsoil Use
Alexander Popov	The Head of Regional Department of the Federal Nature Supervision Agency
Olga Repina	The leading expert of the Division of the protected areas of the Department of the State Policy and Regulation for Environmental protection and safety of the Ministry of natural resources and environment of the Russian Federation
Tatiana Tyupenko	The Head of the Division of realization of International programs of the Ministry of natural resources and environmental protection of the Komi Republic
Tatiana Fomicheva	Director of the “Yugyd va” national park
Alexey Yakushev	Director of the “Pechoro-Ilychskiy” state nature reserve (zapovednik)
Olga Buga	Director of the “Inta” branch of the “Yugyd va” national park
Andrey Petrov	Greenpeace Russia
Mikhail Kreindlin	Greenpeace Russia
Nadezhda Vladimirovna Vetoshkina	“Pechoro-Ilychskiy” state nature reserve, Senior state guarding inspector
Eduard Mikhailovich Loginov	“Pechoro-Ilychskiy” state nature reserve, Senior state guarding inspector
Ivan Ivanovich Sobianin	“Pechoro-Ilychskiy” state nature reserve, State guarding inspector
Vasily Nikolaevich Pystin	“Pechoro-Ilychskiy” state nature reserve, State guarding inspector

Annex 4. Additional maps



Map 3: Location of the Virgin Komi Forests World Heritage Property, Komi Republic, Russian Federation (source: *Virgin Forests of Komi*, Ed. By A.I. Taskaev)



Map 4: Previously proposed excisions for mining and pipeline infrastructure in Yugyd Va National Park in 2004 (Source: Greenpeace Russia)

Annex 5. Recent Committee Decisions

Virgin Komi Forests (Russian Federation) (N 719)

Decision: 34 COM 7B.25

The World Heritage Committee,

1. Having examined Document WHC-10/34.COM/7B.Add,
2. Recalling Decision **33 COM 7B.31**, adopted at its 33rd session (Seville, 2009),
3. Strongly regrets that the State Party appears to have licensed a significant open cast gold mining operation within the World Heritage property, and has also excised other areas from protected status, and also regrets that the State Party did not take into account the previous requests of the World Heritage Committee in taking these actions;
4. Notes that the boundaries of the World Heritage property as inscribed by the Committee have not been amended, and therefore requests the State Party to reconsider its recent boundary demarcation exercises in order to restore the protected status of all areas within the World Heritage property, including all areas that have recently been excluded from the Yugyd Va National Park;
5. Strongly urges the State Party of the Russian Federation to take all necessary steps, with provincial and local government as appropriate, to immediately halt mining activities within the property;
6. Calls on all companies holding licenses for mining in the World Heritage property, with the support of their investors, to not proceed with mining activities, in line with the international policy statement of the International Council on Mining and Metals (ICMM) of not undertaking these activities in World Heritage properties, as also endorsed by the World Heritage Committee;
7. Also requests the State Party to invite a joint World Heritage Centre/IUCN reactive monitoring mission to the property, in order to review the mining threats to the property, to confirm the integrity of its boundaries, and to advise on the effectiveness of the protection and management of the property;
8. Further requests the State Party to submit to the World Heritage Centre, by **1 February 2011**, a report on the state of conservation of the property, taking into account results of a joint World Heritage Centre/IUCN reactive monitoring mission to the property, for examination by the World Heritage Committee at its 35th session in 2011.

Virgin Komi Forests (Russian Federation) (N 719)

Decision: 33COM 7B.31

The World Heritage Committee,

1. *Having examined Document WHC-09/33.COM/7B,*
2. *Recalling Decision 22 COM VII.27, adopted at its 22nd session (Kyoto, 1998),*
3. *Expresses its serious concern with regard to the possibility of creating an enclave for mining activities within the Yugyd Va National Park, component of the Virgin Komi Forests World Heritage property and requests the State Party not to proceed with any development that could threaten the Outstanding Universal Value of the property;*
4. *Requests the State Party to comply with Paragraph 172 of the Operational Guidelines and to inform the World Heritage Centre of any intention to authorize activities which may affect the Outstanding Universal Value of the property;*
5. *Requests the State Party to ensure and to state unequivocally that no commitment has been made on any mining concessions within the boundaries of the inscribed property;*
6. *Also requests the State Party to submit to the World Heritage Centre, by 1 February 2010, a report on the state of conservation of the property, including the confirmation of the removal of any permission or plans to locate extractive industries within the boundaries of the property, for examination by the World Heritage Committee at its 34th session in 2010.*

Annex 6. Position paper submitted to the mission team by representatives of indigenous people of the Komi Republic

Position of the public “To Rescue the Pechora” Committee and Interregional “Izvatasy” Public Movement of Komi-Izhemtsy

The procedure initiated by the Government of the Komi Republic is very hard to be called the “more precise definition of the borders” or the “bringing in conformity” of the declared and real areas. It is necessary to call things with their real names: this procedure in reality means the withdrawal of a part of territory from the “Yugyd Va” national Park. Such a withdrawal as opposed to more precise definition demands the serious grounds.

What arguments were presented to us?

1. The withdrawing territory represents mainly the golets zone and is not interesting from the natural point of view.
2. The development of the industrial mining on the withdrawing territory will have the large economic effect.
3. Local population is interested in this withdrawal because the development of industrial mining here will help to “pick up” the depressed city of Inta and other settlements of this district.
4. In fact the area of the “Yugyd Va” National Park due to the results of the last forest regulation is bigger than that one declared in the documents about the park creation.

About 1st argument. We are convinced that it is the dangerous delusion and even the intentional bluffing. For example Mr. Mozharov, the main geologist of the “Gold Minerals” Close Corporation that several years ago pretended to the development of the gold-bearing deposit in the Kozhim basin, in his newspaper publications and public statements proves that there is “nothing to protect” in the Kozhim basin and that this territory does not possess any natural value, “just stones”. This argument has not a leg to stand on and from the mouth of the GEOLOGIST sounds like intentional bluffing. It is known that the **importance of the golets zone**, where the moisture of the air masses is condensed and the river network is formed, is **great and extremely important**. The destruction of golets will lead to the irreversible destruction of the cryo-lythogenic zone (the horizon of the perennial frozen rocks), that will lead correspondingly to the formation of the thermokarst downfalls, quick grounds, to the creep of the thawed soils and to the progressing irrigation and swamping and finally to the degradation of the subjacent natural layers.

The statement that the worked off areas will be reclaimed is the notorious lie. The attempts of experimental reclaiming works in the Kozhim valley have proved already that qualitative large-scale biological RECLAMATION here is impossible (as it is affirmed by the scientists from the Institute of Biology of the Komi Scientific Center of the Ural Division of the Russian Academy of Sciences, in particular by the Doctor of Biology G.A.Simonov, who was engaged in those works on Kozhim). Even if such reclamation would be possible in some extent, it will demand the expenses that would exceed the incomes from the gold mining repeatedly.

Besides the Kozhim basin is notable for developed hydrographic network. The peculiarities of the catchment area define the formation of the surface waters of a very high quality, that are not only the places of habitation of the relic species but also **promote to the purification of the main riverbed of the Pechora River**, that are highly contaminated as a result of a numerous oil spills and so on. The removal of the plots of the Kozhim basin from the borders of the National Park with the aim to organize here the industrial gold mining will inevitably lead to the contamination and factual destruction of the Kozhim River that plays the significant role in formation of flows and in ensuring the Usa River (the

largest Pechora tributary) with clear water. **The Kozhim basin is the organic natural component of the “Yugyd Va” National Park and in considerable degree defines as the quality of the park natural complexes and its aesthetic value as also its name (“Yugyd va” means “Bright water”).**

About 2nd argument. It is known that this attempt to withdraw the part of the park and to develop the gold mining in the Kozhim basin is not the first one. In 1997 the authorities of Komi Republic also initiated the project of the so-called “more precise specification” of the “Yugyd Va” borders that removed the Kozhim basin outside the park borders. It had been done for “legalizing” of the admitted by the Komi Government systematic violations of the Russian legislation on the territory of the National Park. That project did not pass the Federal environmental assessment not only as the **ENVIRONMENTALLY DANGEROUS** (see the text above), but also as **ECONOMICALLY GROUNDLESS** (it was supported only by 2 members of the commission among 13). All the expert materials could be received in the “To Rescue the Pechora” Committee because the Committee Chair V.T.Semiashkina was one of the experts inside the Federal assessment commission. The reasons of the Assessment Commission of the 1997 still remain in force.

The practice had shown the economic unprofitableness and therefore the hopelessness of the gold mining on this territory. The named by the Komi Government gold deposits represent the prognostic resources that are not still prospected and confirmed. Even the geologists of the Institute of Geology of the Komi Scientific Center of the Ural Branch of the Russian Academy of Sciences do not have the single opinion regarding the value of the inventory. Statements about the wealth of the inventory are ambiguous, groundless and not indisputable.

About 3rd argument. The authors of the idea of withdrawal of the part of the “Yugyd Va” National Park are not only not concerned with the improvement of life of the local population. They roughly disturb and completely ignore its interests and first of all interests of the indigenous peoples that are occupied in the traditional nature use (reindeer breeding).

The fact that the local population is interested in the preservation of this unique territory (at that inside the existing borders) was obvious already when the National Park had been created. In 1992 in the threshold of the park creation the industrial circles of the Komi Republic supported by several Government members of the Republic already tried already to revise the borders of the projecting park and to withdraw the Kozhim basin from it. In connection with that the Conference of the delegated representatives of all regions of the Pechora basin that had been held in the City of Pechora in September 1992 demanded to conduct the Republican referendum on this issue. For that purpose the initiative group had collected more than 20 thousand signatures of the residents of the Pechora basin. The public explaining their demands relied on the opinion of the republican scientists including the results of the Environmental Assessment of the park project that was conducted at that time. In the conclusion of the expert commission adopted by the Council of the State Environmental Assessment was marked that «the Scheme of the National Park...» is approved with the preservation of the park borders in the project limits including the Kozhim basin. **Exactly due to the demand of the Pechora basin population supported by the position of the leading republican scientists, the Council of Ministers of the Komi Republic and later the Supreme Council of the Komi Republic made a decision about the creation of the “Yugyd Va” National Park in the existing borders.**

The argumentation that was followed by the basin residents demanding the creation of the park in the project borders remains in force and now. It was not accidental that conferences of the Pechora basin residents in 1994 – 1996 and then in 2000 years every time marked in the concluding documents that they are against the withdrawal of the Northern part of the park and development of gold mining their. The IV Congress of the Komi people voted for that definitely although the delegates were under the high pressure from the side of the Republican Government. The pressure on delegates became stronger during the V Congress of the Komi people, but the text of the beforehand prepared project of the Congress resolution with the agreement to the withdrawal of the part of “YugydVa” had not been supported by the delegates again.

Thus the **nongovernmental organizations that represent the interests of the local population and act on the territory of the Komi Republic (“To Rescue the Pechora” Committee, Congress of the Komi people, “Izvatras” Public Movement) as in 90th as today express their opinion against the withdrawal of the Kozhim River (or its part) from the “Yugyd Va” National Park.**

Why it is so important for the local population?

Struggle for preservation of the Kozhim basin inside the structure of the “Yugyd Va” National Park is a part of struggle of the regional local population (including indigenous) for preservation of their traditional human environment.

The preservation of the cleanness of Pechora and its tributaries where the role of Kozhim is hardly to be overestimated is vitally important for the local population. The consequences of the oil extraction firstly in the Usinsk District and later in other districts of the Pechora basin finally convinced the local population that **their social and economic prosperity, their health and tomorrow existence depend directly on the quality of the human environment.**

Development of gold mining in the Kozhim basin under existing technologies and approaches used by the mining enterprises will lead to the irreversible contamination of this river and to following contamination of Kosju River. Usa River will deprive of one more source of the clear water. Besides the disturbance of the hydrological balance due to the gold mining in the golets zone in the upper reaches of the Kozhim tributaries, the large-scale anthropogenic influence on mountain tundra landscapes will lead the destruction and degradation of all the underlying natural layers.

The scientists of the Institute of Biology of the Komi Scientific Center of the Ural Division of the Russian Academy of Sciences in their work named «Influence of the development of the placer mines of Prepolarskiy Urals on the environment» have made the single-digit conclusion: **«Taking into account the scales of the damage brought during the working off of placers to the unique systems of the region it is necessary to foresee the different ways of development of the last one».**

This **«another way of development» is possible just in the conditions of preservation of this territory inside the National Park. And only subject to its preservation inside the park borders we will be able to save the Kozhim basin from the complete degradation and destruction. The interest of the local population is right in preservation of those unique natural complexes that define to a large extent the quality of human environment.**

Regarding the economic interest of the local population.

Preservation of this territory inside the park borders will help to preserve the traditional economic branches of the local population including reindeer breeding (which is not prohibited on the territory of the National Park by the law). **Withdrawal of the territory from the park and large-scale industrial mining will inevitably lead to the exhaustion and destruction of the reindeer pastures and liquidation of this branch.** The supposed economic prosperity due to the industrial mining on this territory is not based on anything. The theses about the supposed decision of the unemployment problem due to the development of the mining industry in the Kozhim basin are not bolstered with anything. The called previously figures (for example there sounded the figure of 3,000 working places) usually are taken from unknown places without any estimation. Besides the gold-mining enterprises have used recently mainly workers from outside this region and there are no grounds to count that such a way will not be used in the future.

To our mind, the development of the National Park on this territory is much more perspective and attractive in the sense of job placement of the local population. Already now the park staff consists mainly from the representatives of the local population including indigenous residents from the adjacent to the park settlements and villages. **The development of the park will stimulate the appearance of the accompanying small manufactures in the adjacent settlements, the development of the services, traditional handicrafts and so on. Such a variant of development is much more realistic and attractive for the local population. For them the imposed by the Government branches and directions of the management are not traditional and unattractive because they are connected with the destruction of the environment.**

Another aspect is also important. **The largest part of the tourists arrive to the park territory (including its central part that is located in Pechora District) via the Kozhim. After the withdrawal of the Kozhim basin from the borders of the park (completely or partially) the existing tourist**

routs will be destroyed inevitably which means practical destruction of the possibility of tourism development in the Northern and Central parts of the park.

Thus the preservation of the Kozhim basin inside the borders of the “Yugyd Va” National Park is in the interests of the residents of Inta and other settlements. So far as:

A) its withdrawal from the park structure will inevitably lead to the serious negative environmental consequences. The destruction of the human environment of the people can not be used in the interests of the people. It is always directed against its interests;

B) local population will lose the possibility for development of a new nature spared brunch (tourism) on a base of the “Yugyd Va” National Park. It will also lose the possibility for development all accompanying manufactures. The realization of one of the directions of the park activities will be blocked to a considerable degree.

Argument 4 is insolvent because the such results of the forest regulation are the permissible errors (it sometimes takes place during forest regulation). Besides if it really necessary to bring the real area of the park to the data of forest regulation, it is possible to “cut” the part of the territory somewhere near the border (for example in the place where the new line of the “Bovanenkovo-Ukhta” gas pipe will go) and not in the middle.

Hence we count that industrial development of this territory and connected with that negative influence upon the natural environment of the Kozhim basin are inadmissible.

Valentina Semiashkina, member of the “To Rescue the Pechora” Committee,

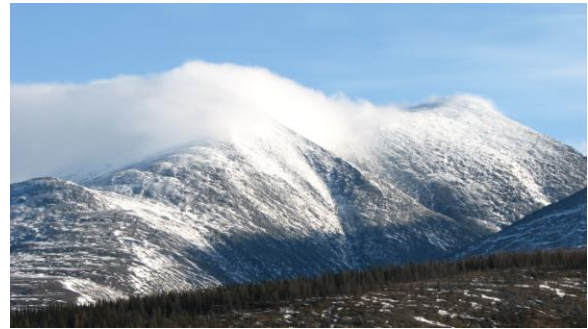
Nikolay Rochev, Chair of the “Izvatas” Public Movement

Annex 7. Additional pictures

Picture 9: Mountain landscape near Chudnoe (YVNP)



Picture 7: YVNP Inta office



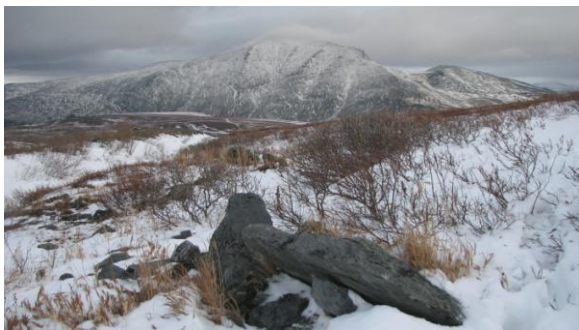
Picture 10: Mountain landscape near Zhelannoe (YVNP)



Picture 8: YVNP Inta office information board



Picture 11: Komi camp near Khozim river (YVNP)





Picture 12: Sanavog park base (YVNP)



Picture 15: Khozim river (YVNP)



Picture 13: Rafting base near Sanavog (YVNP)



Picture 16: Shugar river (YVNP)



Picture 14: Northern-most boreal forest dominated by larch (YVNP)



Picture 17: Chejimdikost park base signpost (PISNR)



Picture 18: Chejimdikost park base (PISNR)



Picture 19: Old seismic lines for mineral exploration near the Upper Illych River



Picture 20: View of the Illych River from Chejimdikost (PISNR)



Picture 21: Helicopter landing at the Manpupuner Plateau (PISNR)



Picture 22: Aerial view of the Manpupuner Plateau and stone pillars (PISNR)



Picture 23: Manpupuner stone pillars (PISNR)