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MISSION REPORT / RAPPORT DE MISSION

Pirin National Park (Bulgaria) (225bis)
Parc national de Pirin (Bulgarie) (225bis)

10-14 October 2011

10-14 Octobre 2011

This mission report should be read in conjunction with Document:
Ce rapport de mission doit être lu conjointement avec le document suivant:

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UNESCO World Heritage Centre - IUCN

MISSION REPORT

*Reactive Monitoring Mission to Pirin National Park, Bulgaria
10th to 14th October 2011*



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November 2011

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EXECUTIVE SUMMARY

From the 10th to the 14th of October 2011, a joint World Heritage Centre-IUCN reactive monitoring mission was organized to the Pirin National Park World Heritage property in accordance with World Heritage Committee¹ Decision 34COM 7B.5. The objective of this mission was to review the recent capacity upgrades of ski facilities in the property's buffer zone, determine their likely impact on the property's Outstanding Universal Value and make a recommendation on the possible inscription of the property on the List of World Heritage in Danger, as requested by the World Heritage Committee at its 35th session. The mission also assessed the overall state of conservation of the property and other factors affecting its Outstanding Universal Value.

Pirin National Park was first inscribed as a World Heritage Site in 1983. It has been on the agenda of the Committee for more than 10 years mainly because of the ski zone within the property. Following recommendations by the World Heritage Committee and IUCN, the State Party submitted a proposal for the extension of the existing property. After a technical evaluation in 2009, the Committee at its 34th meeting in 2010, approved the extension of the Pirin World Heritage Site and the establishment of a buffer zone to strengthen the integrity and management of the property (34 COM 8B.5). In the same decision, the Committee accepted the exclusion of a four areas (150.6 ha) on the periphery, and further the exclusion of the Bansko and Dobrenishte tourism zones (1 078.23 ha) and to include these in a new buffer zone.

Overall the Pirin World Heritage Site appears to be in a relatively good state of conservation. Resources, specifically staff and finances, have been relatively stable for the past years, and the Pirin National Park Directorate² and the Ministry of Environment and Water appear committed to ensuring effective protection and management and securing the integrity and the Outstanding Universal Value of the Pirin World Heritage Site.

The World Heritage Committee decision justified the exclusion of the buffer zone by noting that they are not compatible with World Heritage status because of the impacts on integrity from ski development. It is clear that the two areas do not, on their own, fully fulfil the functions outlined in the Operational Guidelines of the Convention, which expect that buffer zones surround and provide an added layer of protection to the property. Therefore, it is unrealistic to expect that these impacted areas alone would function as effective buffer zones to the property.

In the view of the mission team the replacements and capacity upgrades within the two buffer zone areas have been undertaken in an appropriate manner and cannot be viewed as adversely affecting the Outstanding Universal Value of the property. They are also improvements to safety, efficiency and visitor flow within the buffer zone. It would be advisable to consider that replacement of ski lifts or opening of ski runs in the buffer zone should be left to the State Party to assess and regulate according the relevant laws, regulations and procedures, but ensuring that there is no impact on the Outstanding Universal Value of the property. The World Heritage Committee should not be called upon to assess or consider proposals within the buffer zones. This would disengage the focus from the details within the buffer zone to ensuring that these activities do not negatively impact on the Outstanding Universal Value and integrity of the property.

The municipalities of Bansko and Razlog have explicit plans and aspirations to expand new ski zones within the Pirin World Heritage Site. The Committee needs to take a very firm position that no further

¹ In this report the term Committee is used to refer to the World Heritage Committee.

² In this report the term Directorate is used to refer to the Pirin National Park Directorate.

areas within the property, outside of the already excluded areas, should be permitted for ski or other similarly high-impact developments. Moreover it should be made explicit that the 2010 exclusion of the Bansko and Dobrinishte buffer zone should not be used as a precedent to demand any further boundary modifications. This must be particularly ensured during the preparation of the new management plan of Pirin National Park.

In the future and in the new management plan, a greater focus should be on promoting a sustainable and more balanced development of livelihoods. Emphasis should be on a diversification of tourism both in terms of products, services and season, in line with the new strategy for sustainable nature tourism, developed by the Pirin National Park Directorate as a viable alternative to ski-based tourism development. The Directorate should consider more effective use of the Consultative Committee and the Scientific Advisory Council as platforms to moderate differences and to provide input to the management of Pirin National Park.

The boundaries of the buffer zones, but also the entire property, must be properly measured using ascertained GPS measurements and marked on the ground, and transparently agreed between the Pirin National Park Directorate, the municipalities and concessionaire. It is imperative, that the integrity of the boundary be regularly monitored and enforced by the Directorate. The Ministry of Environment and Water should ensure that plans are put in place and sufficient resources are allocated for the monitoring of the integrity of these boundaries. Violation of the boundaries should constitute a serious offense and breach of concession agreement, and be treated with strictest measures from the Directorate and the Ministry of Environment and Water.

The Pirin National Park Directorate and the Ministry of Environment and Water should also ensure that the implementation of restoration (old ski runs, lifts etc.) measures should be strictly supervised and monitored by the Directorate in accordance with conditions in the Territorial Arrangement Plan, Environmental Impact Assessments or any other subsequent administrative decisions. Further, the Ministry of Environment and Water should put in place sufficient legal, contractual or other administrative arrangements that allow the Directorate to influence the status and use of the chalets inside Pirin World Heritage Site that are owned by the Bulgarian Tourism Union. This would also increase the possibility of the Directorate to influence their environmental impact and their role in providing visitor services in the World Heritage Site.

The mission urges the Ministry of Environment and Water to speed up the process and make available sufficient resources to ensure that the new Pirin National Park Management Plan (2014 – 2024) will be completed without a break between the period of the present plan valid until the end of 2013, and the approval of the new management plan. During the process the preparation of detailed “Tourism Implementation Plans” for the Dobrenishte and the Bansko buffer zone should be considered as part of the new management plan. These would consolidate existing, approved and envisaged plans in a transparent manner and make these explicit parts of the new management plan.

Finally, the mission concludes that presently there is no need to place the Pirin National Park World Heritage Site on the List of World Heritage in Danger, provided strict measures are implemented to enforce the boundaries, the integrity and the Outstanding Universal Value as well as to monitor the impact of activities within the buffer zones and around the Pirin World Heritage Site.

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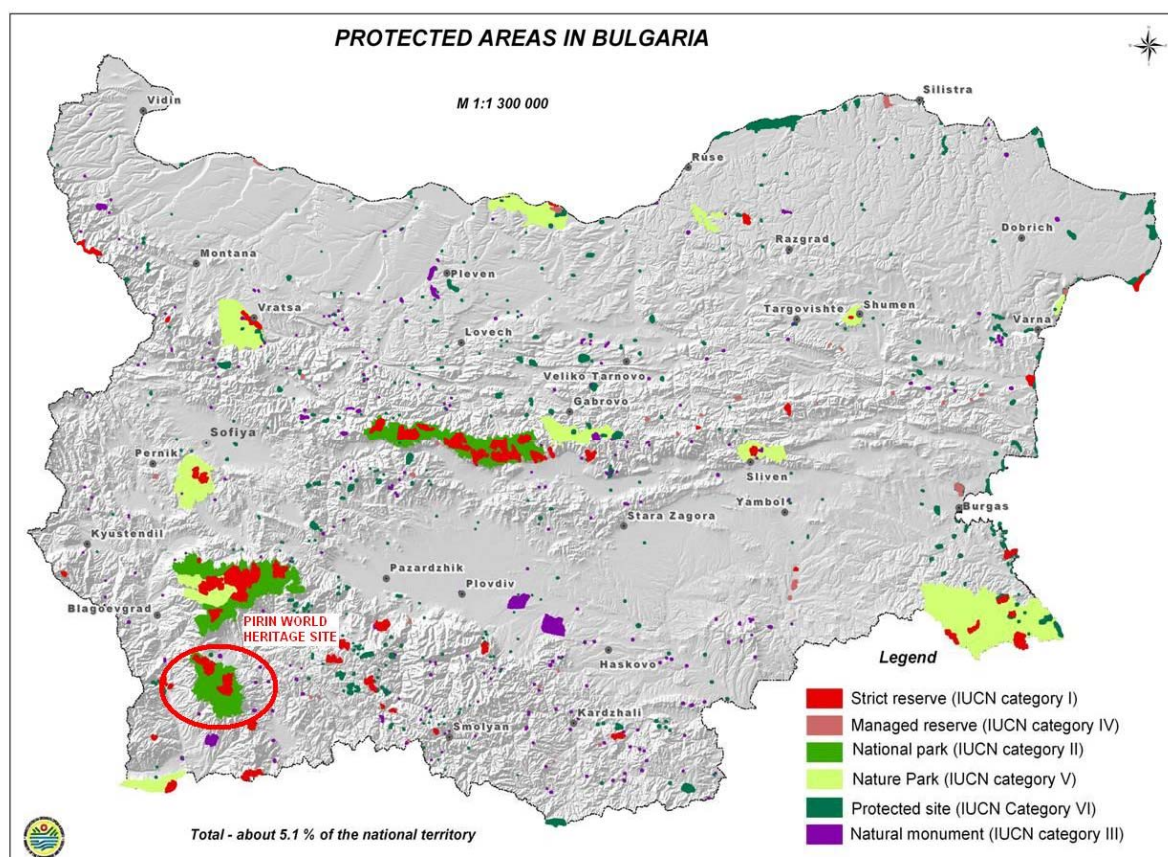
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ACRONYMS

ANPB	Association of Parks in Bulgaria
BBF	Balkan Biodiversity Foundation
BGN	Bulgarian Leva (currency unit)
BTU	Bulgarian Tourism Union
BWS	Balkan Wildlife Society
EIA	Environmental Impact Assessment
EPA	Environmental Protection Act (of Bulgaria)
EU	European Union
BAS	Bulgarian Academy of Sciences
GBS	Green Balkans Society
GPS	Global Positioning System
HEEC	High Expert Ecological Council of the MoEW
IUCN	International Union for the Conservation of Nature
LWHD	List of World Heritage in Danger
MAB	Man and Biosphere (of UNESCO)
MoEW	Ministry of the Environment and Water
MoFA	Ministry for Foreign Affairs
MoREDPW	Ministry of Regional Development and Public Works
NGO	Non-Governmental Organisation
NNPSD	National Nature Protection Service Directorate (MoWE)
NP	National Park
OG	Operational Guidelines for the Implementation of the World Heritage Convention
OUV	Outstanding Universal Value
PAA	Protected Areas Act (of Bulgaria)
PAD	Protected Areas Department (NNPSD, MoWE)
PMP	Pirin National Park management plan
PNP	Pirin National Park
PNPD	Pirin National Park Directorate
PWHS	Pirin National Park World Heritage Site
SEMEPA	State Enterprise for Management of Environmental Protection Activities
TAP	Territorial Arrangement Plan
ToR	Terms of Reference
UNEP	United Nations Environment Programme
UNESCO	United Nations Scientific and Cultural Organization
WHC	World Heritage Centre (of UNESCO)
WHS	World Heritage Site
WWF	World Wide Fund for Nature

1 BACKGROUND TO THE MISSION

The People's Park Pirin (now Pirin National Park) was first inscribed as a World Heritage Site (WHS) in 1983. There was small-scale ski development within Pirin National Park (PNP) at the time of inscription but this was not seen as an obstacle. By 1986 one lift and two ski runs were constructed and were accepted as an element of the PNP and the WHS. Even in 1996 there were just two constructed pistes. However, at the time of inscription, the consequences of the rapid social and economic changes and development for the Pirin World Heritage Site (PWHS), which has since taken place, were not foreseen.



Map1. Pirin World Heritage Site and the protected areas in Bulgaria.

Since the mid-1990's, the basis for economic development in Bulgaria considerably changed. During the transition much of the communist era economic foundation eroded and many of the economic activities offering employment and economic security disappeared. This has led to increased pressures, such as illegal logging and poaching, affecting the integrity of the PWHS. In this transition, the development of ski tourism in Bansko³ has had a considerable impact on the economy of the municipality. According to the Mayor of Bansko³, unemployment was reduced from 47% (1998) to 5% (2001), though the economic recession since 2008 has caused unemployment to increase to close to 30% again. Real estate prices increased from 5 €/m² to 200 €/m², which according to information given to

³ Written statements from the municipalities and Mayor of Bansko provided to the mission

the mission have again dropped to 25% of their 2007 level. The municipal budget in Bansko has grown from 1 mill. € in 1999 to 17 mill. € currently.

Investments in tourism and accommodation started growing in Bansko from the mid-1990s and the capacity quickly exceeded the capacity of the ski facilities. Simultaneously this transformation of the economy reduced illegal activities, such as logging and hunting, within the WHS. In the late 1990's pressures to develop ski tourism and the ski facilities at Bansko within PWHS drastically increased and the municipality initiated the process to develop a Territorial Arrangement Plan (TAP)⁴ for a ski zone in the Vihren Valley inside the PNP and the PWHS. In 1998 the Municipality of Bansko became a shareholder of the Yulen AD, which was the enterprise responsible for the planning and investments in the ski facilities. In 1999, the State Party informed the World Heritage Centre (WHC) about plans for a major ski resort in Bansko.

2. WORLD HERITAGE COMMITTEE DECISIONS

The PNP was inscribed as a WHS in 1983 under criteria (vii), (viii) and (ix)⁵. In 1985 the World Heritage Committee noted the construction of a hotel and ski-resort at the head of the Vihren Valley within the PNP, and the strong opposition from local conservation groups. At the World Heritage Committee meeting in Helsinki in 2001 the TAP was discussed, and IUCN questioned, whether the TAP can be classed as ecotourism and is compatible with World Heritage status. The Committee in its decision (25COM VIII.85) noted the concerns over the TAP, which it anticipated will lead to further incremental development within the remaining larger area. The Committee requested the State Party to ensure that tourism development does not take place in the remaining TAP area in the future.

Further in 2002 concerns regarding threats to the Outstanding Universal Value (OUV), primarily from the ski resort in Bansko and Dobrinishte, were again on the agenda of the Committee⁶, and discussed based on a joint UNESCO and IUCN mission report. Based on these repeated concerns, the Committee for the first time noted but deferred a proposal to include the Pirin National Park World Heritage Site on the List of World Heritage in Danger (LWHD). In early 2004 a new joint monitoring mission was carried out by UNESCO and IUCN. Specific concerns were expressed especially regarding the development in the ski zone, the lack of adequate maps of the property, ski and buffer zones, of zoning, and generally regarding poor response to the Committee requests by the State Party. Similar issues were on the Committee agenda also in 2005 and in 2007.

Following recommendations by the World Heritage Committee and IUCN, the State Party submitted a proposal for the extension of the existing property in early 2007. This was withdrawn by the State Party in 2008, prior to the 32nd session of the Committee. After a technical evaluation in 2009, the Committee at its 34th meeting in Brasilia in 2010, approved the extension of the PWHS and the establishment of a buffer zone to strengthen the integrity and management of the WHS (34 COM 8B.5). In the same decision, the Committee accepted the exclusion of a four areas (150.6 ha) on the periphery (also excluded from the Pirin NP), and further the exclusion of the Bansko and Dobrenishte tourism zones (1,078.23 ha) and to include these in a new buffer zone.

⁴ In this report the term TAP is used throughout. In other documents the terms Territorial Development Plan and General Spatial Plan can be found to refer to the same TAP

⁵ World Heritage Committee Decision 07COM VIII

⁶ World Heritage Committee Decisions 26COM 21B.2; 27COM 7B.15; 28COM 15B.21; 29COM 7B.23; 31COM 7B.27; 33COM 7B.21

The PNP has been on the agenda of the Committee for the past 10 years. The main concerns come from the developments within the ski zone outlined by the TAP but there have also been other issues. Main concerns have been:

- The developments within the ski zone and the impact on the WHS integrity and OUV, and the role of the TAP and PNP management plan in controlling these developments;
- Boundaries of the WHS, the zoning and buffer zones;
- Efforts to develop an effective management, including securing staff and resources for the Pirin National Park Directorate (PNPD); to effectively control of license agreements or other legal rights for use of resources or activities in the WHS; to take effective measures to stop the violations against the laws within and around the World Heritage property.;
- Restoration of the disturbed ecosystems and dismantled facilities;
- Creation and role of a Scientific Advisory Body;
- Creation and role of a Consultative Committee;
- Establishment of long-term monitoring for the purposes of conservation and maintenance of the values of the World Heritage property and regularly report on the state of the property.

Based on the recommendations of the 2009 evaluation and following the implementation of proposed upgrades of the ski facilities in the buffer zone in 2010, the Committee at its 35th session (Decision 35COM 7B.29) requested a reactive monitoring mission. According to the Terms of Reference (ToR) the purpose was to review the recent capacity upgrades of ski facilities in the property's buffer zone, determine their likely impact on the property's Outstanding Universal Value and make a recommendation on the possible inscription of the property on the List of World Heritage in Danger. In addition the mission was to assess the overall state of conservation of the property and other factors affecting its OUV. The detailed ToR is attached in Appendix 1.

3. ASSESSMENT OF ISSUES AND THREATS

The reactive monitoring mission reviewed issues and assessed the potential impacts of a number of threats, specifically the development of the ski facilities, on the Outstanding Universal Value of the Pirin NP. The general management effectiveness of the PNP was also evaluated.

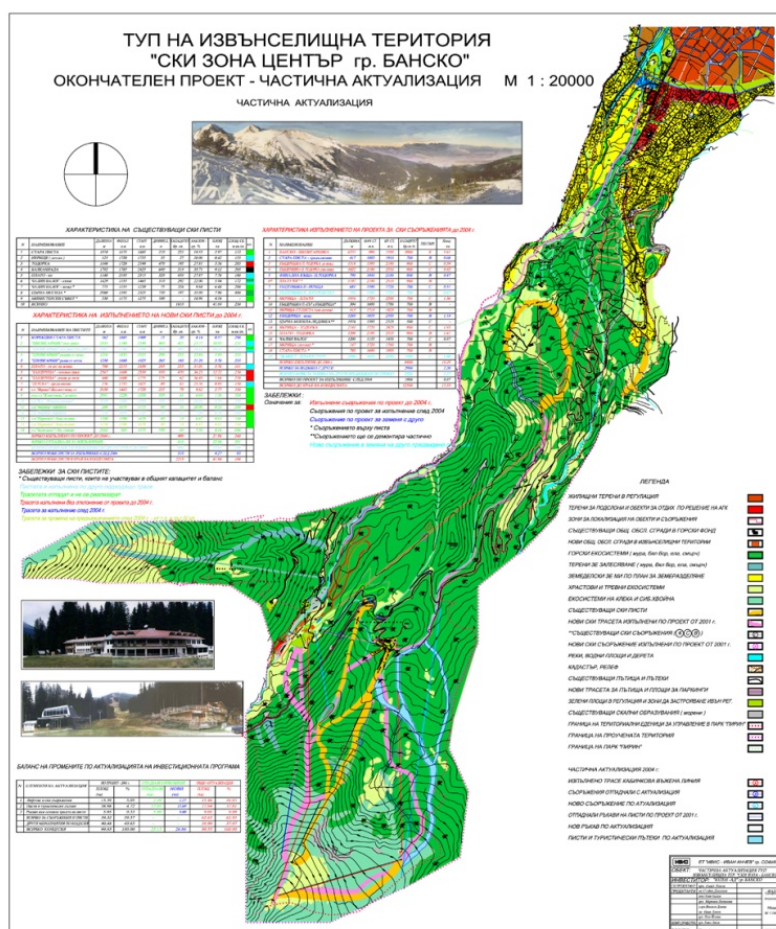
3.1 Pirin NP, Territorial Arrangement Plan and the Ski Zone

The Territorial Arrangement Plan is a tool for spatial planning. The municipality is responsible for the planning process and the municipal council approves the draft TAP and submits the plan to the Ministry of Regional Development and Public Works (MoRDPW) and the Ministry for Environment and Water (MoEW) for legal approval. The TAP for the Bansko ski zone was completed according to the standard national process, including an Environmental Impact Assessment (EIA), and was approved and adopted in 2001⁷(Map 2).

With the completion of the TAP, the MoEW signed a concession agreement for the development of the ski zone with Yulen AD in 2001. The concession was granted for 30 years (2001 – 2031). This was the first and is still the only such concession agreement in Bulgaria. According to the MoEW, there are some complications with the agreement. Since the signing of the agreement a rapid develop-

⁷ Order No. 09-13/2001 of the Mayor of Bansko (The State Gazette 23/2001) after Resolution on the Environmental Impact Assessment 57-13/2000

ment phase was started and most of the development in Bansko ski zone took place between 2002 and 2004 but continued to 2007 with some replacements and upgrades up to 2010.



Map2. Territorial Arrangement Plan for Bansko Ski Zone.

Between July 2001 and August 2002, the Pirin NP Management Plan⁸ (PMP) was developed. The development of the Bansko ski zone, outlined in the TAP, was included in the management plan as the guideline for regulating the Bansko tourism zone. Though the TAP included development of considerable ski facilities these were approved as the plan for the development of the tourism and ski zone of the PNP and the WHS.

Since the expansion of activities and the construction of the ski facilities started, there has been continuous discussion and contentious debates about whether the development has been in accordance with the TAP, and thus approved within the framework of the PNP management plan, and in accordance with accepted management of the WHS.

During the last more than 10 years this has resulted in a situation, where the State Party, the World Heritage Centre and the Advisory Body (IUCN) have been repeatedly challenged by arguments for and against the activities in the ski zone, and where several decisions have been subject to legal pro-

⁸ Approved by the Council of Ministers Resolution 646/06.08.2004 (The State Gazette 73/2004)

ceedings in Bulgaria. The PNP has also been constantly on the agenda and a continuously debated issue on the Committee meetings. It could be concluded, that issues of increasingly narrow technical nature of the ski facilities within the ski zone have taken the focus off the overall management and status of the Pirin World Heritage Site.

Following the concerns regarding the development within the ski zone and the possible threat to the integrity and to the OUV of the PWHS, a technical evaluation was conducted in 2009. Based on the recommendations of this evaluation, which also included proposals for exclusions as well as expansion of the property, the status of the tourism/ski zone within the WHS was changed to a buffer zone of the World Heritage Site.

It is obvious, that the development of the ski resort and facilities have over the past 20 years grown from a rather insignificant add-on of the PNP to an activity, which has entirely transformed the nature of the ski zone and the Vihren Valley (see photos in Annexe E). This gradual development has, however, been the result of step-wise plans and decisions accepted, though debated, by both the State Party and the World Heritage Centre. The greatest impacts to the PWHS have followed from the approval of the TAP as the instrument for the development of the ski zone.

It would also be unrealistic, and give cause for continuous conflicts, to expect the ski facilities to remain at the level and standard of the early 2000 when the TAP was developed. Security aspects, technical issues, consumer preferences and behaviour have drastically changed and require improvement of the safety, quality and standard of the facilities and services.

3.2 The Pirin World Heritage Site Buffer Zone

When Pirin NP was inscribed, the boundaries of the WHS did not follow an ecological rational and hence created a rather fragmented property with a low level of integrity. For a long-time, even the lack of a precise map of the inscribed property was an issue for the Committee. Following recommendations by the World Heritage Centre and IUCN, and after a technical evaluation by IUCN in 2009, the Committee approved the extension of the PWHS and the establishment of a buffer zone to strengthen the integrity and management of the WHS. The same decision, excluded the Bansko and Dobrenishte tourism zones (1,078.23 ha) and to included these in a new buffer zone.

The decision on the establishment of the buffer zone has been debated and challenged. During the mission several stakeholders⁹ expressed concern and reservation regarding the decision on the buffer zone. The main reservation was that the current buffer zones of Bansko and Dobrenishte do not meet the criteria or comply with the definition for buffer zones in the Operational Guidelines for the Implementation of the World Heritage Convention (2008). Especially the interpretation and application of Operational Guidelines (OG) paragraphs 103¹⁰, 104¹¹ and 105¹² in section II.F, Protection and Management, in the PWHS buffer zone were discussed.

⁹ Notably the representatives of the municipalities, the Yulen AD, and of the National Civil Coalition Environment for the People and Regions

¹⁰ “Wherever necessary for the proper conservation of the property, an adequate buffer zone should be provided.”

¹¹ “For the purposes of effective protection of the nominated property, a buffer zone is an area surrounding the nominated property which has complementary legal and/or customary restrictions placed on its use and development to give an added layer of protection to the property. This should include the immediate setting of the nominated property, important views and other areas or attributes that are functionally important as a support to the property and its protection. The area constituting the buffer zone should be determined in each case through appropriate mechanisms. Details on the size, characteristics and authorized uses of a buffer zone, as

The missions noted that there are complications regarding the buffer zone interpretation. Buffer zones should by definition surround the property and provide an added layer of protection to the property. In the case of Pirin WHS, the buffer zone does not surround the property but rather makes intrusions into the WHS, which in the case of Bansko, penetrate along the Vihren Valley and slopes up to the top of the Todorka Peak (see Fig. 1). Further, this buffer zone is located between the Yulen and the Bayuvi Dupki-Dzhindzhiritsa reserves, both of which are designated as Ia - reserves zones in the PNP management plan. The aim of this zone is to preserve natural succession, samples of natural ecosystems and structural landscapes largely free of human use and impact, based on the Protected Areas Act (PAA) of Bulgaria. This largely complies with the definition of the IUCN Protected Area Category Ia (Strict Nature Reserves), i.e. protected areas with the strictest protection.



Fig. 1. A Terrain model of the Pirin WHS with the Bansko Buffer Zone roughly marked in red.

It is also difficult to justify how the buffer zone would provide an added layer of protection to the WHS. The buffer zone establishment was rather a decision to accommodate the realities of the ski zone. The establishment of the buffer zone, rather than excluding it from the WHS, can be justified and be seen as an attempt to retain a degree of control and contain disturbance within the zone, which could threaten the integrity and the OUV of the WHS. The justification provided in the decision taken by the WHC to exclude these areas was that they are not compatible with World Heritage status due to impacts on integrity from ski development. Therefore, it is unrealistic to expect that these impacted areas would function as buffers to the property.

Hence all development within the ski zone should be regulated by the Protected Areas Act and the Pirin NP management plan and other relevant legislation, regulations and procedures for such activities in Bulgaria. It should also be made explicitly clear, that this should not be seen as a precedent to further exclusions, and that no other such measures would be accepted without having to consider the whole status of PNP as a WHS. In view of the strong request for future development of ski facilities

well as a map indicating the precise boundaries of the property and its buffer zone should be provided in the nomination.”

¹² *“A clear explanation of how the buffer zone protects the property should also be provided.”*

(e.g. Dobrenishte, Kulinoto) expressed mainly by some of the municipalities and the concessionaire (see chapter 3.6), this solution may not entirely resolve the issue. However, these new proposals should be addressed during the PNP management planning process, which has been recently initiated.

Many of the problems and conflicts relate to lack of transparency and the multiple instruments (TAP, PNP Management Plan) and maps that regulate the development within the buffer zone. In connection with the management planning exercise it would also be important that the State Party and the PNPD should consolidate these instruments and consider preparing explicit tourism implementation plans for the tourism zones of the PNP (the present buffer zones). In Bansko this would have to be based on the TAP (as it is approved and basis for the concession agreement). For Dobrenishte there are no explicit approved plans (except the PMP) controlled by PNPD (or MoEW). A draft TAP for Dobrenishte has been prepared by the municipalities in 2008. Detailed tourism implementation plans as part of the management plan would make the development within the zones more transparent and more explicitly part of the management of the PWHS.

In 2009 the evaluation mission concluded that with the proposed expansion and exclusion measures, the integrity and the OUVs of the PWHS are secured. The mission felt, that the facility upgrades that have been made since, and were reviewed during the mission, do not change this assessment and the conservation status of the WHS. However, it is obvious that the values within the buffer zone have been entirely transformed and eroded. Thus the exclusion of the buffer zone did not affect the OUV of the WHS. Consequently, the justification provided in the Committee decision to exclude them was that they are not compatible with World Heritage status because of the impacts on integrity from ski development. However, any further ski developments or proposals for exclusions, such as those proposed for Dobrinishte and Kulinoto (see Map 6), would result in a situation, which seriously questions the status of the PNP as a World Heritage Site.

3.3 Pirin WHS and Buffer Zone Boundaries

The original boundaries of the property created a rather fragmented property with a low level of integrity. As noted in the previous chapter, the lack of a precise map for the property, and the zones has also been an issue at the World Heritage Committee. In 2010, the Committee approved the extension of and the establishment of a buffer zone to strengthen the integrity and the OUVs of the WHS. Regardless of these decisions, new concerns, some leading to legal processes, were raised during 2010 and 2011 regarding the integrity of the boundaries, especially in relation to developments within the new buffer zone. Many of the concerns relate to activities and development, which are claimed to take place outside the boundaries of either the concession area or the buffer zone¹³.

The mission noted that there is no clear or common understanding of the boundaries. There also appears to be “many boundaries” with many and differing maps for the TAP area, the ski zone, the buffer zone, and the concession area. The mission also noted that the boundaries are not marked on the ground. All of this is further complicated by the differences between the different boundaries, referred to above, notably those of the buffer zone and concession area¹⁴. This is compounded by a general lack of transparency, trust and common understanding between different stakeholders.

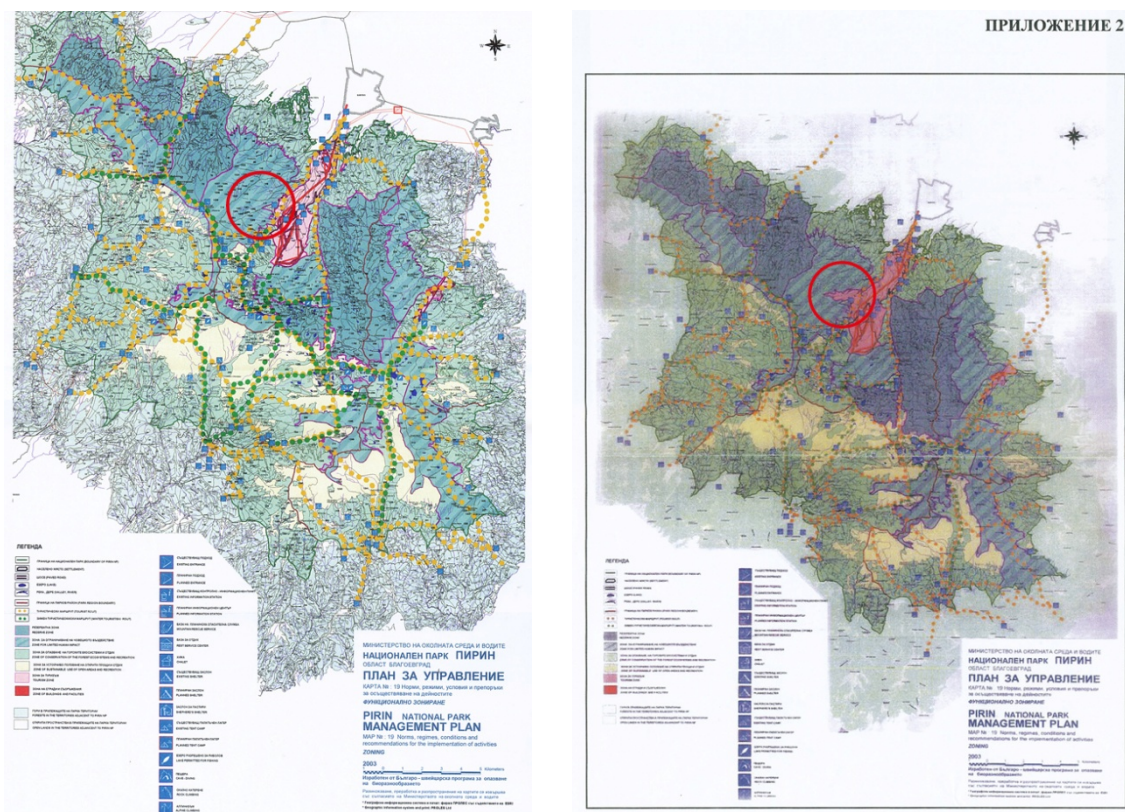
The mission noted that the boundaries for the ski zone of Bansko differ in the TAP and in the maps of the PNP Management Plan. For example, the ski zone boundaries in map 19¹⁵ attached to the PNP

¹³ e.g. Supreme Administrative Court, Administrative Case No. 11153/2010 (Replacement of the Platoto lift)

¹⁴ This contradiction was referred to in the court proceedings (Supreme Administrative Court, Administrative Case No. 11153/2010) by the senior legal advisor of the MoEW

¹⁵ Map 19: Norms, regimes, conditions and recommendations for the implementation of activities - Zoning

Management Plan differ from a similar official map (map 19) from the PNP Management Plan attached to the statement provided to the mission by the Mayor of Bansko (see Map 4). In the latter the ski zone boundaries appear consistent with the boundaries of the TAP, and in the former consistent with the current buffer zone decision. It is, however, unclear if the latter map was from the separate annex of maps mentioned in the management plan. The main difference between these two maps relate to the extension of the ski zone up along the western slope towards the Banski Suhodol Peak encompassing the Tzarna Mogila ski run and lift.



Map 3. Bansko ski zone boundaries in Map 19 (Norms, regimes, conditions and recommendations for the implementation of activities – Zoning) attached to the PNP Management Plan (left) differ (red circles) from a similar seemingly official map (right) from the PMP attached to the statement provided by the Mayor of Bansko.

There are also differences between the boundaries of the buffer zone and the concession area map¹⁶. Based on a map provided by the MoEW (Map 4) to the mission, the concession boundaries are mostly within the existing buffer zone boundaries, though there are some discrepancies. It appears e.g. that the concession boundaries slightly exceed the buffer zone boundary, just north of Banderishka Poliana. It also appears that the ski run 10, the easternmost ski pist from the lower Platoto terminal to Shiligarnika, runs outside both the concession and buffer zone boundaries, inside the PWHS, for a short distance.

One source of conflict has been that the development of ski facilities has taken place outside the concession area boundaries. The concessionaire is managing facilities and has made interventions outside

¹⁶ Appendix 1 to the Concession Agreement

the concession boundaries but nevertheless within the buffer zone boundary¹⁷. According to the MoEW the concessionaire has right to the entire ski zone as indicated by the TAP and the PNP management plan. Nevertheless, these boundary discrepancies and disagreements create uncertainty. The lack of common agreement and transparency regarding the boundaries has been and will be a source of confusion and conflict also in the future unless the boundaries are not measured, agreed, marked on the ground and monitored in a transparent manner.

In 2010, the MoEW commissioned the GPS measurement of all facilities (lifts, pistes, slopes, other facilities) within the ski zone to two independent companies. This assignment did not, however, include the boundaries of the buffer zone. The results of the MoEW GPS survey have been disputed by the company, which has conducted their own measurements. Presently, there are negotiations between the MoEW and the concessionaire, as there is disagreement about the results of the measurements.

In the discussions with the mission, the concessionaire (Yulen AD) also expressed the need for clearly and jointly agreed boundaries, both on maps and on the ground. The boundaries should also be properly marked on the ground. It was, however, obvious that there is considerable mistrust between the parties.

The mission recommends that the boundaries (buffer zone, concession area, ski zone, TAP) should be reconciled and measured in reliable and transparent manner¹⁸. These boundaries should be agreed upon by the primary stakeholders (MoEW, PNP, concessionaire, and the municipalities). Further, boundaries should be marked on the ground, using standard procedures for such marking, in order to ensure that the boundaries, especially those of the WHS, can be enforced and monitored. PNP should be tasked and provided with the necessary resources to implement the boundary demarcation.

Finally, the PNP should be tasked and provided with the necessary resources by the MoEW to ensure a sufficient and effective enforcement and monitoring of the boundaries. The MoEW should also make it clear that violation of the boundary, especially the boundary against the WHS, will constitute a serious offence against the integrity of the WHS, and take any necessary administrative and legal actions to ensure the integrity of the property.

3.4 Impact of the Recent Capacity Upgrades

The objective of the monitoring mission was to review the recent capacity upgrades of ski facilities in the buffer zone of the WHS. The capacity could be reviewed from two aspects: (1) The impact of up-grading individual ski facilities, such as lifts and pistes; and (2) The relationship between the capacity of Bansko town, which is servicing visitors, and the capacity of the ski zone to accommodate skiers and visitors.

3.4.1. Recent upgrade of ski lifts

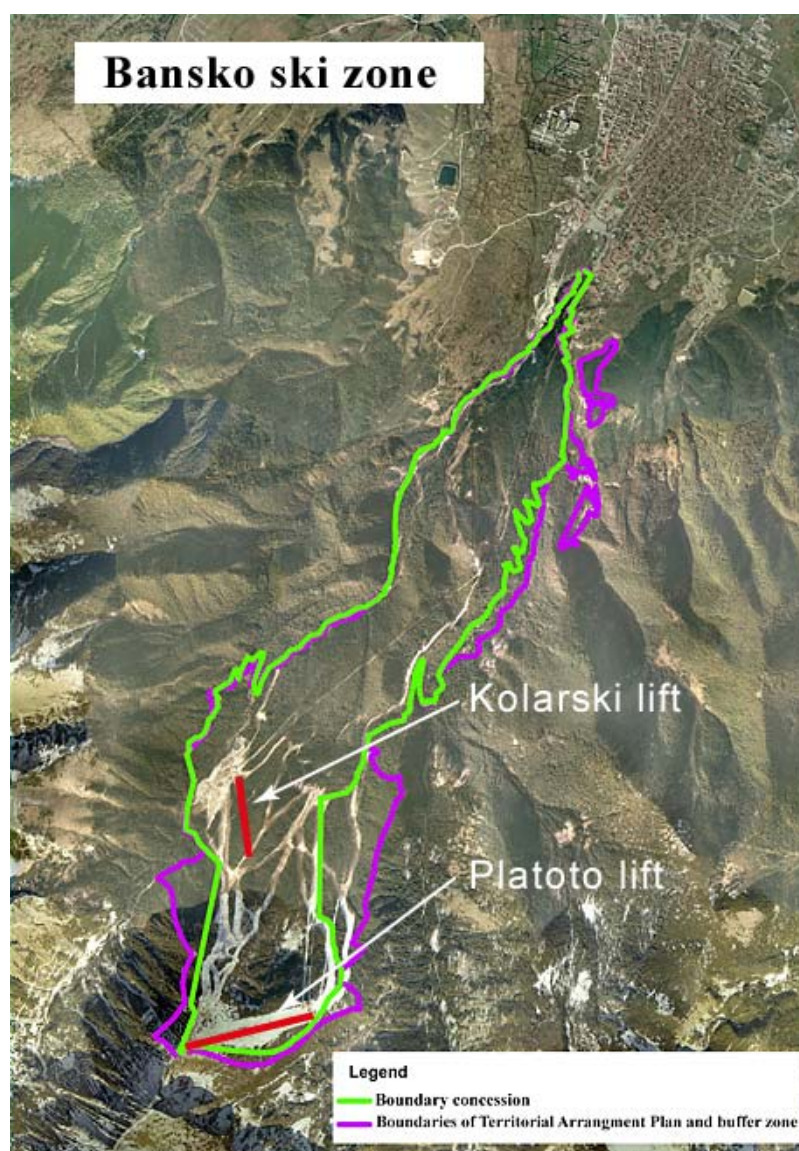
The two most recent upgrades (Map 4) were the up-grading of the Kolarski lift from a 4-seat to a 6-seat¹⁹ chair lift, and the upgrading of the Platoto²⁰ drag lifts to a 4-seat chair lift²¹.

¹⁷ According to Para 11 of Article 1 of the Concession Agreement the right of use ceded to the Concessionaire is within the boundaries of the approved TAP

¹⁸ Preferably by an organization responsible for such land demarcation in Bulgaria (perhaps the Geodesy, Cartography and Cadastre Agency of the MoRDPW)

¹⁹ MoEW Decision No 25 – PIP/2010 and Decision No 33 – PIP/2010

²⁰ Is written both as Plato and Platoto in different documents. The latter is used in this report



Map 4. Location of the replacements of the two lifts.

A field visit was made to the ski facilities (see Map 5). The mission travelled with the Bansko gondola lift from the town through the middle station at Chalin Valog up to Banderishka Poliana. The mission continued by car up to the lower terminal of Shiligarnik and travelled by the 4-seat chair lift up to the upper terminal. Then continued by walking to the base station of Platoto and travelling with the 4-seat chair lift up to the upper terminal at around 2 600 m.a.s.l., just below the Todorka Peak (at 2 746 m.a.s.l.). After returning the same route, the mission further travelled up the new Kolarski 6-seat chair lift to the Kolarski upper terminal. During the field visit, the mountain was covered by 20 – 30 cm of snow, which made it difficult to make observations e.g. about restoration and landscaping.

²¹ MoEW Decision No 31 – IIP/2010

The general observation from the field visit was that the eastern part of the Vihren Valley has been heavily transformed by the ski facilities and developments from Bansko town to the slopes of the Todorka Peak. Pylons, ski runs and lifts are present from the valley floor almost up to the peak. Pylons and lift wires as well clearings for pistes and lifts are highly visible in the landscape, especially on the sub-alpine and alpine part of the slopes (see Photos 1, 18, 21 in Appendix F).

Nevertheless, much of the facilities (ski lifts and runs, restaurants and cafes, etc.) visited or observed appeared to be of reasonably good quality and safety standards, under good management, comparing well with any modern ski facility. Despite the overall transformation caused by the ski facilities, the impression from the clearing and routing of lifts used by the mission was that those which were in the forested part of the slopes were implemented with relatively narrow clearings. There were no apparent signs of unduly wide clearings or unnecessary cutting of trees along the lifts that were visited.

Kolarski lift

The Kolarski lift is situated in the forested mid-slope and transports skiers from the Banderishka Poliana at slightly below 1 600 m.a.s.l. to a mid-plateau, the Kolarski pat, situated at around 1 900 m, where also two short drag lifts, Stara and Detska Kotva, arrive. An existing four-chair lift was replaced with a new 6-seat chair 6CDL lift with a total of 49 chairs. The 12 pylons of the old lift were replaced with 8 new pylons, varying in height from 4.5 to 17 m. The total capacity increases from 1 000 to 3 000 persons per hour. The new lift impacted around 0.1 ha and required the cutting of an estimated maximum of 82 trees²².

The Kolarski is situated in an area, which is generally highly transformed by the ski runs, lifts and other facilities. The impression was that the upgrade had been done without undue clearing and expansion of the area used by the previous 4-seat lift. Landscaping, including planting grass, had been done at least in the lower station. Erosion control measures had been done along the route of the lift.

Platoto lift

The Platoto pist and lift is situated on the alpine eastern slope of the Todorka Peak, located approximately between 2 130 to 2 520 m.a.s.l. It is, according to the concessionaire, the most popular and appreciated area among the skiers. The first T-bar drag lift was built in the 1980s. The two former drag lifts (lengths 1 201 m and 1 195 m) have been replaced by a 4-seat Cupelbar 4CLD chair lift²³, with 98 chairs, 13 pylons and a length of 1 456 m. The old drag lifts had a total of 20 metal pillars on concrete fundaments, four stations and occupied a total of 3.76 ha. This increases the total capacity from 1 600 to 2 000 persons per hour. The decision to allow the replacement also included a condition that the old two lift should be completely removed, which seemed to have been done²⁴.

The course of the new lift is for the most part within the course of the old drag lifts and the southern branch of the Platoto ski run (the runs are on both sides of the old drag lift route). In the upper part the course of the lift runs on the south-western side of the slope but still mainly within the area occupied by the ski runs. The new lift creates an extension of 267 m to the north-east. Some expansion (0.14 ha) of the area has taken place at the lower station, which is situated slightly lower than those of the drag

²² Mainly in habitats “*Acidophilic forests of Picea in Mountaineous to Alpine regions*” and “*Forests of White and Black Fir*”

²³ Both drag lifts were included in the TAP for the ski zone of Bansko approved by Order No. 09-13/01.03.2001 of the Mayor of Bansko (The State Gazette 23/2001)

²⁴ The snow cover (20 – 30 cm) made it difficult to have a complete view of restoration of the route of the two drag lifts, e.g. of the pillar foundations

lifts for providing better access to skiers. These changes have included cutting of some trees²⁵. The new lift has required higher and stronger pylons, which are perhaps more visible in the landscape. These upper slopes have, however, already been transformed by the pylons of the Mosta (in the lower part) and by the Todorka and Banderitza 2 (in the upper part) chair lifts.

The conditions in the decision allowing the replacement require restoration of the old drag lift routes. This could not be verified due to the snow cover. However, in light of the fact that the total area occupied by the Platoto ski run appears to be wider than what is envisaged in the TAP map and that the new lift slightly extends into new areas, it is important to ensure that the restoration measures are implemented by the concessionaire and monitored by PNP/MoEW.

3.4.2. Capacity in Bansko and in the ski zone

The balance between the capacity of accommodation and services in Bansko town and the capacity of the ski zone has been central from the start of the development of the TAP and the PNP management plan. This demand-supply balance is one of the major factors in the conflicts experienced and the future plans presented to the mission. This has been a central issue already in the TAP, which proposed that the maximum number of beds in Bansko should be augmented to 6 000 – 7 800. Though this was an estimate, which depends on many factors, the TAP further states that the capacity of the slopes and facilities should be kept under close account, to avoid interruptions in the provision of services or breaches in the environmental equilibrium in the area.

In about 10 – 15 years the town of Bansko has undergone a dramatic change. According to the information provided by the Municipality of Bansko, up to 800 mill € has been invested in the municipality and presently there are 17 000 hotel and apartment (about 50%) beds in Bansko, with 800 000 bed nights during high season and 200 000 during summer²⁶. However, other sources estimate the number of beds up to 60 000 or even more, with up to 80% apartments. Though it was difficult to get reliable information on the present status it is apparent that equilibrium no longer exists. The number of beds has considerably exceeded the estimated maximum proposed in the TAP and the equilibrium has been replaced by a pressure to further expand the ski zone. This was given as the justification by several stakeholders, especially the municipal representatives, for their request to develop new and expand the existing ski facilities as well as for amending the PNP management plan and for exclude further areas from the PWHS. In this respect, the provisions of the TAP seem to have been breached.

Currently Bansko is in the aftermath of a real estate bubble and affected by the economic recession since 2008. There are many hotels, apartment houses and other infrastructures which are half-built without signs of activity to complete them, and there are many signs advertising apartments for sale (see photos 3, 6 in Appendix F). Real estate prices are a quarter of what they used to be in 2007 and unemployment is up again.

This capacity imbalance is the consequence of development driven by other factors and interests than the aim for a planned and balanced urban or regional development. The municipality has failed to contain the development of the capacity in the town within the limits provided by the TAP and the capacity of the ski zone, or to build on and re-direct this rapid development to more diverse visitor demands. Despite the apparent imbalance, primarily all development has been based on winter tourism and the ski resort.

²⁵ Mainly affecting “*Shrub communities with Pinus mugo*”, “*Forests of White and Black Fir*”, and “*Alpine and Boreal ericoide communities*”

²⁶ Mayor of Bansko in meeting with the mission

3.4.3. Conclusions

The development of ski facilities has over the years considerably transformed the nature of the ski zone and the Vihren Valley. Much of this was determined with the approval of the TAP in 2001, which was noted by the Committee²⁷, and accepting the TAP as the plan for developing the tourism zone of the PNP management plan in 2004. Though most of the facilities were constructed between 2002 and 2007, development has included a gradual extension of the area used by different facilities within the boundaries of the ski zone. Nevertheless, it would be unrealistic to expect the ski facilities to remain at the level and standard of the early 2000 when the TAP was approved. They should, however, remain within the overall framework given by the TAP. Hence changes in capacity and in the physical location of facilities may differ from the original plan. This does not necessarily mean more area used or greater impact, and all such changes and proposals have been subjected to review, assessment, EIAs and decisions by the competent national authorities, including when necessary legal processing. However, there have been and still are conflicts regarding the plans, implementation and the decision-making procedures²⁸.

The mission concludes that the replacement of the old lifts with a 4-seat (Platoto) and a 6-seat chair lift (Kolarski), though not foreseen in the TAP, can be accepted within the provisions of the TAP and the PNP Management Plan²⁹. Though there have been some changes and impacts, these are relatively insignificant, considering that they occur in areas, which already have been highly transformed. The impression was also that the upgrades have been planned and implemented trying to avoid unnecessary impacts on the sites, landscape and values. Though there is local capacity increase in the slopes affected by the replacements, the overall capacity is still primarily determined by the gondola and other lower lifts. The mission also recommends that the PNPD and the MoEW should ensure that the concessionaire complies with conditions of the replacements, such as the need to restore the area of the old drag lifts in Platoto³⁰. This could not be fully verified during the mission.

It also seems that there is an apparent imbalance between the capacity of the town and the capacity of the ski zone. In this respect it is clear that the recommendations and provisions of the TAP has not been followed. The maximum number of beds in Bansko by far exceeds the recommendation of the TAP. The consequence will be a continuous demand for expansion of the capacity primarily within the Bansko ski zone (but also Dobrenishte) but also a demand for new areas (e.g. Kulinoto) to be developed for ski tourism.

The mission also felt that the recent replacements and capacity upgrades cannot be viewed as adversely affecting the Outstanding Universal Value of the property. Moreover, these are also justified from safety, efficiency and visitor flow perspectives. Taking the above factors into account, it would be advisable to consider that proposals for replacement of ski lifts or opening of ski runs, within the areas already excluded from the property, should be left to the State Party to assess and regulate according the relevant laws, regulations and procedures. The World Heritage Committee should not be called upon to consider these proposals within areas that it had determined to be “not compatible with World Heritage status”. However, it should be ensured that activities permitted to be undertaken

²⁷ “The Committee noted the concerns over the Territorial Development Plan (TDP), which it anticipates will lead to further incremental development within the remaining larger area. It requested the State Party to ensure that tourism development does not take place in the remaining TDP area in the future...”25COM. VIII.85

²⁸ One example is the controversy regarding cutting of trees in the decisions (MoEW Decision No 25 – IIP/2010 and Decision No 33 – IIP/2010) and the Orders to allow the upgrading the capacity of the Kolarski lift. The first was revoked due to noncompliance by investor but later permitted by a new decision

²⁹ Point 13 of Regime 77 (*Finishing the construction of the approved ski runs and facilities according to the adopted Territorial Structural Plan of “Ski zone with center Bansko” and its EIA of 2000*)

³⁰ and other areas where restoration has been the condition of EIAs or administrative decisions (Chalin Valog west, Tzarna Mogila etc.)

within these excluded areas do not in any direct or indirect manner impact on the property's values and integrity.

3.5 Existing Ski and Tourism Facilities and the TAP

A rough assessment of the existing ski facilities and a comparison of these against the TAP was done. A detailed assessment would require a much more sophisticated analysis of the TAP, the decisions taken, including justifications for possible changes in implementation, and a spatial analysis of the area impacted by the presently existing facilities. It would also call for an analysis approved facilities which have not been built and the possible impact of this. Such detailed assessment was, however, not possible within the time frame of the present mission.



Map 5. Map of the ski runs and lift in the Bansko ski resort.

In general, it can be concluded that buffer zone has been greatly transformed by the ski facilities. There are also claims that the clearings for ski runs have been made wider than what is permitted in the EIA (2000)³¹. During the mission, it was not possible to verify all claims, but comparing some of the aerial photographs (e.g. see Map 4) and the TAP map (see Map 2) it appears that this may be true for some runs. Especially, the upper part of the Platoto seems to be wider than what is planned in the

³¹ According to the Association of Parks in Bulgaria, the clearings are in places between 30 – 120 m wide

TAP. Also areas where ski runs join seem wider. A rough comparison between the plans and the impact and realities can be seen by comparing e.g. Map 2 (TAP) and the aerial photograph in Map 4 indicating the recent replacements.

3.6 Other Development Plans, Proposals and Issues

The mission met with several stakeholders concerned or engaged in the development in or around the PWHS. It is clear that the pressures to expand and develop ski and other facilities inside or around the PNP are driven by the, at least partly, speculative developments, especially in Bansko and Razlog municipalities. There appears to be significant supply and demand imbalance (see 3.4.2), with lots of half-built hotels and houses, and much capacity for sale or to let in the towns. Without detailed information and analysis, the impression was that there is substantial past investments that have been made without a sound investment or economic analysis, though it should be recognized that this was done primarily during the economic boom leading up the global financial crises in 2008³².

Municipalities

The mission met with stakeholders from the municipalities. The area of the PNP falls within the jurisdiction of seven municipalities, but the ski facilities of Bansko and Dobrinishte are within the limits of the Bansko municipality. Mayors and representatives of these municipalities, including the representative of Bansko to the National Assembly attended this meeting. During the discussions it became clear that there are strong and growing interests in further developments of existing areas or new areas that may directly impact on the WHS. There is now interest also from the municipality of Razlog to develop ski facilities in the alpine areas of Kulinoto, although this is currently not possible under the management plan. Likewise, the Mayor of Bansko talked about the need to further extend the ski zone and facilities at Dobrinishte, although this is also currently not possible. Some of these plans are clearly incompatible with the integrity and OUV of the property.

The main point made by the Mayors at the meeting centred on the importance of ski-based tourism to the socio-economic development of the region. The point was also made that any restrictions on the replacement of ski equipment or upgrading of facilities and capacity will have serious socio-economic repercussions and a reversion to illegal logging.

In Bansko the municipality wants to:

- Build a second cabin lift from the town to the Banderishka Poliana;
- Replace the existing lift in Tzarna Mogila and re-open the pist;
- Expand the water reservoir at Banderishka Poliana to increase the capacity to produce artificial snow; and
- Open 2 new ski runs in the Bansko ski zone.

In Dobrinishte the municipality want to:

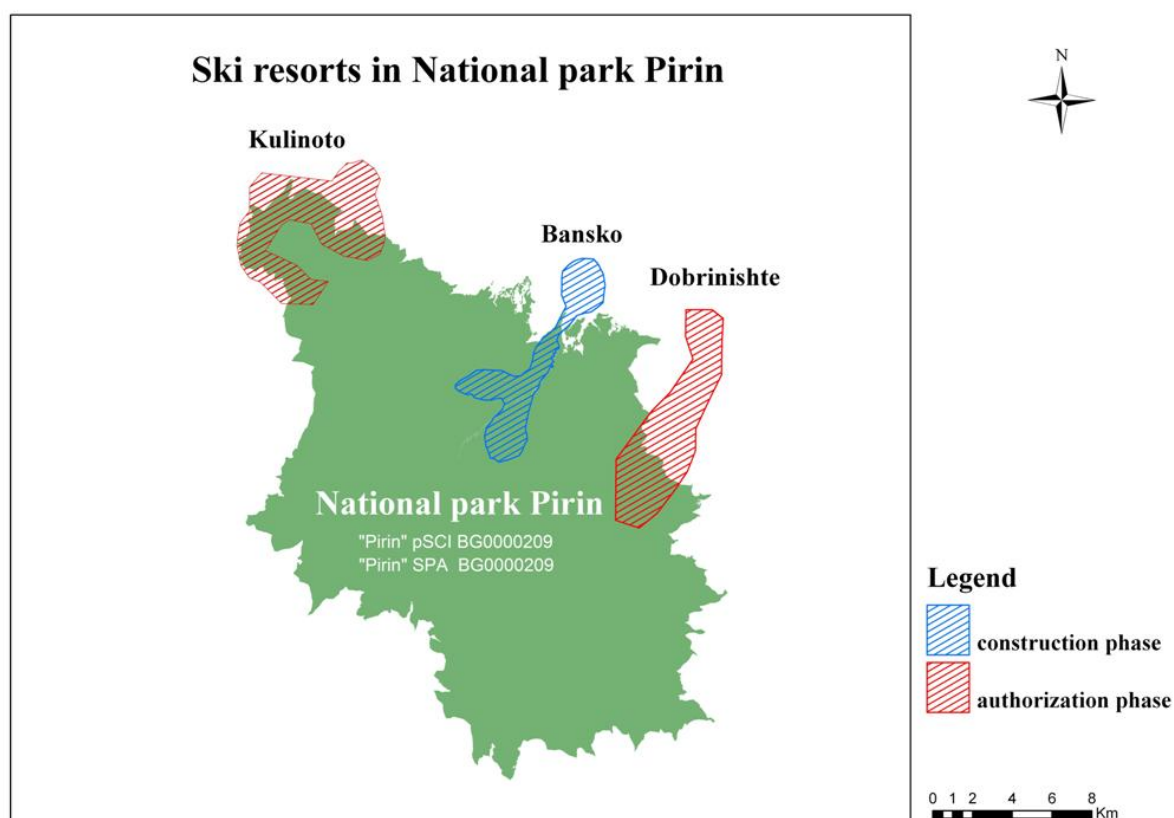
- Replace existing lifts;
- Expand the ski runs; and
- Open one new ski run.

³² The mission was told, though this could not be verified, that real estate prices and apartment prices in 2011 were about 25% of the price level of 2006 – 2007

In early 2011, investment plans amounting to up to 200 mill. euro³³ in ski facilities in Bansko and Razlog were announced by three investors. This included new and expanded plans for the existing Dobrinishte ski zone, a new ski zone in Kulinoto near Razlog Municipality, and new investments in the Bansko ski zone (for approximate location of the areas see Map 6).

The municipal representatives informed the mission that Territorial Arrangement Plans have been prepared and approved by the municipalities for a proposed new ski zone in Kulinoto (2008) adjacent to Razlog, and for an expansion of the existing Dobrinishte ski zone (2010). According to the municipalities EIAs have been completed but not submitted yet. The former is proposed within the PNP and the WHS, while the latter is proposing an extension of the ski zone (and buffer zone) into the WHS. The municipalities suggested that the PNP Management Plan should be amended to accommodate expanded ski development within the WHS, and for exclusion of additional areas from the WHS. However, according to the MoEW no such proposals have been formally presented to the MoEW, neither prior to the 2009 mission or after this mission and the World Heritage Committee decisions. It remains unclear, on what grounds such TAPs can be developed by the municipalities inside or affecting the PNP, without involving the PNPD which is responsible for the state owned land of the NP in the planning process.

It must also be noted that much of the discussion is driven by the municipalities of Bansko and Razlog, without due regards to the aspiration and needs of the five other municipalities surrounding the PNP.



Map 6. Map indicating the location of proposed ski resorts in Pirin NP.

³³ see e.g. www.dnevnik.bg/pazari/2011/002/26 (“Galchev”, ”Yulen” and “Balkanstroy” will finance 200 km ski runs in the area of Bansko and Razlog)

Concessionaire

The mission also met with representatives of the Yulen AD. The company mentioned that it has made considerable investments in sewage and waste water treatment, soil rehabilitation and landscaping. They mentioned several needs for upgrading and development of the facility. The main point made was that old ski lifts, some of which are even 30 years old, need to be replaced with modern equipment for both safety and efficiency purposes. Regarding the capacity upgrades, the company noted that the overall capacity is primarily determined by the capacity of the lower lifts, especially the gondola lift from the town, rather than capacity changes of lift up along the slopes.

During the discussions Yulen AD also expressed somewhat ambiguous views about the sufficiency of present buffer zone in relation to the plans of the company. They also clarified that they do not need to or intend to build any accommodation within the boundaries of the buffer zone, but only request for implementing activities within the excluded buffer zone and under the provisions of the TAP and management plan. It was also clarified that the production of artificial snow for the ski runs depends solely on air pressure and water, and no chemicals are used in this process in PNP, contrary to some claims. However, the company also clearly expressed a request that the buffer zone be expanded and the PNP management plan amended.

On the request of the mission, Yulen AD presented a list of planned interventions that the company would wish to implement within the buffer zone:

1. A second cabin lift from the town through the middle station to Shiligarnik;
2. Upgrading the Todorka 4-seat lift;
3. Replacing the Stara Kotva drag lift with chair lift (not clear what capacity);
4. Building chair lift and re-opening the Tzarna Mogila pist; and
5. Enlarging the water reservoir at Banderishka Poliana for increased snow production of artificial snow.

Of these proposals, no. 2 (see photo 19, Appendix F), and no. 3 are rather similar to the upgrades assessed during this mission. Proposal 5 is also an expansion of existing facilities (see photos 8 and 15, Appendix F), but would require a more thorough investigation, especially hydrological impacts. Proposal 1 is within the existing concession area but would considerably broaden the route to the middle station (c.g. photo 5, Appendix F), and open up an entirely new route from the middle station to Shiligarnik lower station. This route is also not included in and would contradict the approved TAP.

Finally the most controversial proposal is the re-opening of the Tzarna Mogila pist and lift (c.f. photo 15, Appendix F). This has been closed for the past 15 years but not entirely dismantled. This would also re-open the use of the western slopes of the Bunderitsa Valley. However, the area is outside the concession area and the buffer zone, and would compromise the integrity of the Pirin NP WHS.

It may be noted that Dobrinishte currently does not have any identified concessionaire. The ski zone there is both within and outside the property's buffer zone, with only the smaller part extending into the buffer zone. The PNP controls the areas within the buffer zone to ensure compliance with the laws, while a private owner operates the ski facilities that are largely located outside the PNP.

State Party

The PNP management plan and the activities of the PNP is focussed on a future, which would provide a broader set of options than the present narrow focus on ski-based tourism. A Strategy for Nature Tourism has just been completed. The mission team also briefly met with the Minister of the MoEW. According to the Minister, PNP is very important and all efforts will be made to ensure its effective management. The importance of the ski tourism in transforming the economy in the region was noted

but the MoEW emphasised that the future should be based on a more diversified, sustainable economy built on the WHS. These issues will also be reflected in the new management plan with an emphasis given to summer tourism, including spa tourism. The minister mentioned that MoEW is working to transfer the mineral water resources, which have been controlled and managed (somewhat unsatisfactorily) by the state, to the municipalities.

Further it was noted, that the MoRDPW is currently engaged in a project for promotion of special destinations in Bulgaria, and PNP is specifically included aiming at the development of summer tourism. In order to increase transparency, which appear to have been a major cause of tension in the past, all information related to environmental laws, assessments and directives, which are applied for replacement of ski facilities, are uploaded on the MoEW website, including the decisions made.

The approved management plan of PNP (2004 – 2013), does not allow for development of any new ski areas and facilities. The developments proposed by the municipalities regarding Dobrinishte and Kulinoto cannot be approved by the MoEW as they would be against the present management plan. Consequently, new ski zones would not be allowed. Only the replacement and modernization of existing facilities, or the development of ski runs can be considered after required assessments have been conducted.

National Civil Coalition Environment for the People for the People and Regions

During the meeting with the representatives of the coalition, a copy of the formal written submission was presented and handed over to the mission. The submission traces the history of the nomination and examination of the site's state of conservation by the World Heritage Committee, and makes a plea for corrective nomination and zoning of the PWHS.

The coalition echoed the interests of the municipalities and the concessionaire. The coalition requested to exclude the buffer zones of Bansko and Dobrinishte, as well as the ski zone of Kulinoto for sport and tourism purposes; creation of an appropriate zoning system; update of the management plan; and implementation of the Seville Strategy for Biosphere Reserves in respect of the three reserves that are within the PNP and creation of buffer zones around them. The coalition also demanded that the State Party should submit a new nomination by 1st February 2012 to enable these changes.

Environmental NGOs

Several NGOs, that have been active on the issue of the state of conservation of PNP, were represented in the meeting (see people contacted, Appendix D). The NGOs claimed, that the State Party is not seriously dealing with the various problems and consequently they have been requesting to place PNP on the list of World Heritage in Danger. A general lack of transparency has led to facilities being developed in violation of law.

Their concern was that the PWHS has lost its values because of the ski development, and that the World Heritage Committee has been too slow to act. In their view the PNPD is not managing the PWHS well enough, and ski development has penetrated deep into the property up to the alpine zone and has destroyed forest tracts, which are key habitats e.g. for bears. Generally, in their view, the alpine zone is poorly managed as it is difficult to access, and there is not enough equipment and incentive for effective management.

3.7 Management Planning and Management Effectiveness

The Pirin National Park Directorate, with its main office located in Bansko, is responsible for the management of PNP. The PNP falls under the Protected Areas Department (PAD) in the National Nature Protection Service (NNPS) of the MoEW.

3.7.1. Management

The PNP staff has grown from some 40 staff in 2002 to the present number of 51 staff in 2005. This includes a Director, 9 Experts, 34 Inspectors and Rangers, and 7 administrative staff, all funded by the state budget. Between 2002 and 2010 the total funding in the PNP has varied between around 660 000 and 680 000 Bulgarian Leva (BGN) during the 2006 – 2008 period to more than 1 mill BGN in 2004, 2009, and 2010. In 2010 the total funding was almost 1.8 mill BGN. Implementation of conservation measures is mainly financed through the State Enterprise for Management of Environmental Protection Activities (SEMEPA) established through the Environmental Protection Act (EPA). This funding has varied from around 700 000 BGN in 2004 to between around 70 000 and 120 000 BGN in 2006 – 2008. The other variation in funding is mainly caused by external project financing. The state budget financing has been relatively stable, mostly contributing between 40 – 60% of the financing.

The overall resourcing (staff, financing) has been rather stable over the past 10 years. Based on this and the discussions with staff and stakeholders there is no major change since the previous evaluation in 2009. However, by mid-2011, the SEMEPA funding to PNP was only around 27 000 BGN, which may indicate a drop in overall funding for 2011, including restricting the ability to implement conservation activities in PNP. The ability to effectively manage the PWHS and to deal with the increasing pressures in the buffer zones and around the PNP will primarily depend on the available funding. The mission emphasises the importance that the government allocates sufficient funding to the PNP and express concern regarding the low level of SEMEPA funding that has been allocated for 2011. It is also important to note, that the management planning exercise 2012 – 2014 will require sufficient and additional funding in order to be able to cope with the challenges facing the national park and the Pirin WHS.

The mission also noted that a Scientific Council (SC) has been established in 2004 according to the PMP. The PMP expect the Council to meet at least once a year but it appears it has convened only once. The Scientific Council should meet regularly as it could be a useful mechanism to support management of the PNP and the World Heritage Site, as well as in providing advice on various development plans affecting the PNP, including the ski development. Many issues, disputes and claims could be addressed with the help of inputs from the Council.

The PNP has recently (2011) prepared a Strategy for Sustainable Nature Tourism. This is the results of a project undertaken by the PNP under the UNESCO Participation Programme, titled “Sustainable natural resource management based on sustainable tourism promotion in Pirin National Park”³⁴. This project focused on the development of a range of sustainable tourism options, based on the locally available natural and cultural resources, with an emphasis on summer tourism, as opposed to only ski-based winter tourism.

There are several chalets and facilities within the park that could support the extension of the tourism season, especially providing a greater opportunity to experience the park in the summer. There is a good network of trails and hiking routes in PNP, and the network of chalets could form a basis for better hiking service provided by the park management. This could also support a diversification of the

³⁴ Together with the related publication titled “*Pirin National Park – Benefits for People and Nature*”

tourism in the surrounding municipalities, some of which (e.g. Bansko, Razlog) are entirely focussed and dependent on ski tourism. However, according to the information received during the mission many of these chalets are old, mostly of low standard and not well managed. Waste and waste water management is insufficient and not according to present environmental standards, and they can pose a problem (at least local) to the OUV of the WHS unless they are better and consistently managed. The chalets are owned by the Bulgarian Tourism Union (BTU). There are currently no contractual or other administrative mechanisms for the PNP to control or regulate their use and status.

The mission notes that the MoEW and the PNP should use existing or create a framework for the a contractual arrangement between the PNP and the BTU to enable the PNP to upgrade and develop a more effective and better quality service for visitors hiking in the park. It should also be possible to use or direct e.g. European Union (EU) structural funding to upgrade these facilities.

According to information given to the mission the Tzarna Mogila ski run and lift, which has not been in use for many years, has still not been dismantled and the area restored. Further, an upgrading and re-opening of the ski run was proposed and requested both by the concessionaire and the municipality. Such challenges, which most likely have to be dealt with during the coming management planning exercise, could probably have been avoided if the dismantling and restoration would have been implemented as the run was closed.

3.7.2. Management Planning

The Protected Areas Act provides legal and regulatory framework for protected area management plans and the planning process. The management planning process is commissioned by the MoEW and based on a Terms of Reference, which is also approved by the MoEW. Once the planning process is completed, which stipulates public hearings and stakeholder involvement, the draft plan is presented to the MoEW for review. If the draft plan and process comply with the legislation and the ToR, the draft is submitted to the High Expert Ecological Council (HEEC) of the MoEW for consideration. The HEEC can make a recommendation to the minister to submit the draft MP to the Council of Ministers for approval as such or with additional recommendations given by the HEEC. If considered insufficient the HEEC can remit the draft plan for further processing and revision. The management plans for national parks are finally approved by the Council of Ministers. According to the MoEW, the time required to complete the planning process requires, in the best case, around two years.

The National Park Pirin Management Plan 2004-2013 was developed between July 2001 and August 2002 with financial support from the Swiss Agency for Development and Co-operation. The Management Plan was approved and adopted in 2004 and provides the framework for the management of the national park.

The mission notes, that the present management plan is the result of a thorough and well planned process. However, it appears that many of the recent conflicts relate to some lack of transparency and contradicting understanding of the role and information of different plans and agreements (notably TAP, PMP and concession agreement), as well as regarding physical boundaries. Perhaps a greater emphasis should have been given to a detailed integration of the other plans, such as the TAP and the concession agreement, and a detailed outlining of the plans for e.g. the Dobrinishte ski zone into the PMP. It appears that the challenges caused by the ski/tourism zones, which were outlined and included in the PMP, though noted, were to some extent underestimated at the time of planning.

Considering that a minimum of two years is required, that the mandate of the present plans expires in the end of 2013, and that the PNP will present a very challenging case, it is of great urgency to start the management planning. The MoEW foresee that the PNP management planning process would be completed during 2012 – 2014. However, during the 2009 evaluation, it was envisaged that the management planning would start in already 2010. According to the MoEW there are plans to allocate funds for 2012 for the planning process but this was not confirmed and the low level of SEMEPA

financing by mid-2011 give reason for great concern. Nevertheless, the process has been initiated, and the PNP Directorate has submitted a draft ToR for the management planning process to the MoEW for consideration. In the case of PNP, the ToR must take the EU directives (especially Birds and Habitat Directives), the World Heritage Convention, and other international commitments and conventions into account.

The mission notes that in relation to the plan in 2009 there is already a one-year delay. The ToR have only just been submitted but not yet approved by the MoEW. Considering that the process in Pirin is much more challenging and complex than in a normal national park and protected area management planning process, the planning process must receive high priority and be sufficiently resourced if the plan is to meet the expectations and be completed within the expected time frame.

Several concrete plans and aspirations affecting the PWHS were presented by the municipalities and the concessionaire during the mission. The PNP management planning process has to address especially the following proposals to expand the ski zone in Bansko and Dobrenishte, and the proposal for a new ski zone in Kulinoto. It will also need to ensure that there is clarity and consistency regarding various boundaries, especially those between the existing ski zones in the PNP and the PWHS³⁵. Further, the plan must deal the institutional and legal arrangement of the around 10 chalets, owned by BTU, to strengthen the status of PNPD in aligning their management with the objectives of the PNP and the WHS.

The vision and objectives of the Strategy for Sustainable Nature Tourism should be integrated in the up-dated PMP. The strategy has incorporated many of the visions and ideas presented by the MoEW and by the minister. These specifically include a diversification of tourism (e.g. spa tourism, therapeutic use of baths, hiking etc.), an extended season, and broader focus with a base in the PNP as a WHS.

4 STATE OF CONSERVATION

Overall, the World Heritage property appears to be in a good state of conservation. Resources, specifically staff and finances, have been relatively stable for the past years, and the PNPD and MoEW seem committed to ensuring effective protection and management and securing the integrity and the OUV of the PWHS. The main issue of concern revolves around the development of ski-based tourism with strongly polarized views.

The mission concluded that presently there is no basis to place the PWHS on the List of World Heritage in Danger, provided strict measures are implemented to ensure further development does not take place within the boundaries of the property, as well as to monitor the impact of activities within the buffer zones and around the Pirin World Heritage property.

There appears to be no prospect in reconciling ambitions to develop the ski resorts with the requirements of the WHS, and nor is it realistic to expect scaling back activity and impact from the present levels outside of the World Heritage Site. Placing the WHS on the LWHD would appear to be likely to postpone decisions being taken, without leading to an improvement of the status, integrity and impact on OUV.

³⁵ The Bansko and Dobrenishte zone are within PNP but not part of the WHS

Integrity

The PNP is clearly defined from the point of view of its mountainous nature and ecology, and the boundaries of the property are of sufficient size to capture the natural values of Pirin. Adequate boundaries have been established through the extension of the initially inscribed property, to include the most remote areas of the interior of the National Park, and exclude adjacent areas that are not compatible with World Heritage status due to impacts on integrity from ski development.

Outstanding Universal Value

Pirin NP was inscribed on the World Heritage List under the criteria (vii), (viii) and (ix) in 1983 (see statement of OUV in Appendix E). The original inscription proved to be inadequate in representing and maintaining the Outstanding Universal Value of Pirin, but the extension approved at the 34th meeting of the World Heritage Committee in 2010 has addressed the issue to the extent possible. Currently the World Heritage Site covers an area of around 40,000 ha and overlaps with the Pirin National Park. The mission did not observe major changes regarding management capacity or effectiveness or ability to maintain and secure the OUV of the property as compared to the situation during the 2009 evaluation of the most recent extension. Further, the mission team noted that the recent replacements and capacity upgrades have been undertaken in an appropriate manner without undue impacts on the buffer zone or the property. The mission considers that the most recent changes in the buffer zone cannot be considered to have adversely affected the Outstanding Universal Value of the property.

5 CONCLUSIONS AND RECOMMENDATIONS

1. The mission notes, that overall the Pirin NP World Heritage Site appears to be in a good state of conservation. Resources, specifically staff and finances, have been relatively stable for the past years, and the Pirin National Park Directorate and the Ministry of Environment and Water seem committed to ensuring effective protection and management and securing the integrity and the Outstanding Universal Value of the Pirin World Heritage Site. Nevertheless, it was noted, that the financial allocation for implementation of conservation measures for 2011 was exceptionally low.
2. Further, the mission concludes, that presently there is no need to place the Pirin World Heritage Site on the List of World Heritage in Danger, provided strict measures are implemented to ensure further development does not take place within the boundaries of the property, as well as to monitor the impact of activities within the buffer zones and around the Pirin World Heritage property.
3. The main issue of concern revolves around the development of ski-based tourism and the related facilities and activities. The views are extremely polarized, with different stakeholder groups for and against both existing and further developments. The ski resorts within the buffer zone areas and the Pirin National Park continue to constitute a threat to the property's Outstanding Universal Value, including both the integrity and the effectiveness of protection and management of the property, if the aspirations and plans of some of the municipalities and stakeholders for further ski developments within the property are not contained. Unless addressed, the issues that have previously been of concern are likely to again be raised by the World Heritage Committee and would also have impacts on the status of World Heritage in Bulgaria. The mission recommends that Pirin National Park Directorate and Ministry of Environment and Water should consider more effective use of the national park Consultative Committee and the Scientific Advisory Council as platforms to moderate differences and to

provide input to the management of the property, especially regarding the two buffer zone areas.

4. The main focus of the mission was to address issues related to ski facilities within the buffer zone. After consulting the State Party and stakeholders, the mission concluded, that the future would have to build on accepting the realities and impacts of past developments and decisions. A constructive way forward would be to refocus on ensuring that these activities do not negatively impact on the Outstanding Universal Value and integrity of the property, rather than on the details of arrangements within the buffer zones. For years already the State Party, the Committee and the Advisory Body have been forced to focus attention on possible deviations from plans and agreements or engage in assessing the impact of replacements and upgrades, rather than provide constructive inputs to the future management of the WHS.
5. It was difficult to foresee the impact of approving the Territorial Arrangement Plan as a framework for development within the World Heritage Site. It would, however, be unrealistic to expect activities within the Bansko ski zone to be drastically scaled down or even contained within the technical solutions outlined in the TAP. In 2010, the Committee excluded the Bansko and Dobrinishte ski zone from the World Heritage property and designated them as "buffer zones". However, these areas do not really fulfil the functions of a buffer zone as outlined in Paragraph 104 of the Operational Guidelines to the Convention, which is to provide an added layer of protection to the property. Moreover, these two excluded areas do not "surround" the property but are rather intrusions into it. The justification provided in the Committee decision to exclude them was that they are not compatible with World Heritage status because of the impacts on integrity from ski development. Therefore, it is unrealistic to expect that these impacted areas would function as effective buffers to the property.
6. The mission concluded, that the most appropriate way forward would be to accept the developments within the Bansko buffer zone as outlined by the TAP, to consider the status of these areas as a special buffer zone, and to focus attention on monitoring the impact of the buffer zone activities on, the Outstanding Universal Value, including integrity, protection and management of the Pirin World Heritage Site.
7. Taking these issues into account, it would be advisable to consider that proposals for replacement of ski lifts or opening of ski runs (within the framework of the approved TAP), and their impacts within the areas already excluded from the property, should be left to the State Party to assess and regulate according the relevant laws, regulations and procedures in Bulgaria. By excluding the buffer zones from the property in 2010, the Committee considered them "*not compatible with World Heritage status*". Hence the World Heritage Committee should not be called upon to assess or consider proposals within the buffer zones, except where these would impact on the property's Outstanding Universal Value. The State Party should be specifically requested to notify to the World Heritage Centre any development taking place within the two buffer zones that it considers might have impacts on the Outstanding Universal Value of the property. However it should not need to notify amendments within the buffer zone that are assessed as not having impacts outside the buffer zones.
8. The mission concluded that the recent replacements and capacity upgrades were not foreseen in the TAP. The mission is of the view, that these have been undertaken without undue impacts on the property, and that they cannot be considered to adversely affect the Outstanding Universal Value. They are also improvements to safety, efficiency and visitor flow within the buffer zone.
9. The mission noted that the municipalities of Bansko, Razlog have explicit and concrete plans (e.g. TAP for Dobrinishte 2010, TAP Kulinoto 2008) to develop and expand new ski zones within the Pirin World Heritage Site. Were those developments to proceed, they would clearly impact on the Outstanding Universal Value, and would contradict the position that has consis-

tently been taken regarding the establishment of Pirin National Park as a World Heritage Site. The State Party should take a proactive approach to ensure that the Pirin National Park Directorate is represented and given the opportunity to influence any spatial or other planning, such as TAPs, surrounding the World Heritage Site or with the potential of impacting on the property. While there was some partly contradicting information given by the Concessionaire about their aspirations and development plans, most of the listed facility development plans were within the boundaries of the concession. However, the request and plans to re-open and develop the Tzarna Mogila ski lift and ski run would re-open the western slope of the valley and extend developments outside the present buffer zone boundaries, and hence, should not be permitted. It is imperative to recognise that any further development of ski or other such facilities within the World Heritage Site would seriously compromise the integrity and the Outstanding Universal Value of the property.

10. The mission considers that the World Heritage Committee needs to continue to take a very firm position that no further areas within the property, outside of the already excluded areas, should be permitted for ski or other similarly high-impact developments. Moreover, it should be made explicit that the 2010 exclusion of the Bansko and Dobrinishte buffer zones, which were agreed as part of the extension of the property, cannot be used as a precedent to consider further boundary modifications to facilitate additional ski development. This must be particularly ensured during the preparation of the new management plan of Pirin National Park.
11. The mission also noted that the pressure to expand the capacity of existing as well as the planning of new ski facilities is driven by the unsustainable and economically unsound development of accommodation and service infrastructure primarily at Bansko. There is an obvious imbalance between the capacities of the town and the ski zone. This imbalance drives the pressure to expand ski tourism at the expense of other more sustainable and less seasonally dependent forms of economic development. It was also noted that the ski resort development is driven by Bansko and Razlog, without sufficiently considering the aspiration and needs of the five other municipalities surrounding the Pirin National Park. These future plans need to be critically reviewed during the preparation of the new management plan. Whilst these are not direct issues in relation to the World Heritage Site, they also imply clearly the need for the State Party to ensure more effective wider regional planning and to not permit developments that exceed the capacity of the area.
12. A greater focus should be on promoting a sustainable and more balanced development of livelihoods as outlined by the Minister for Environment and Water. Emphasis should be on a diversification of tourism both in terms of products, services and season, in line with the new strategy for sustainable nature tourism, developed by the Pirin National Park Directorate. The tourism strategy, emphasising summer tourism, needs to be promoted and implemented, as a viable alternative to ski-based tourism development. The strategy includes interesting proposals for each of the seven municipalities, taking into account their natural and cultural resources.
13. Regarding the integrity of the Pirin National Park, the mission recommends that the boundary of the property as defined in Committee Decision 34COM 8B.5, especially the boundaries of the buffer zones, should be clearly marked, communicated and maintained. Many of the conflicts of the past relate to the lack of clarity on boundaries. It is of particular importance that the boundaries are properly measured using ascertained GPS measurements, marked on the ground, and communicated to the municipalities and concessionaire. It is also imperative, that the boundary be regularly monitored and enforced by the Pirin National Park Directorate, to ensure that it is being respected, and that the ministry ensures that plans are put in place and sufficient resources are allocated for this. Violation of the boundaries should constitute a serious offence and breach of concession agreement, and be treated with the strictest measures by the Directorate and Ministry of Environment and Water.

14. It is also important that the Directorate and Ministry of Environment and Water put in place processes to monitor the impacts of the ski and other activities within the buffer zone on the surrounding property. The impact of past and potentially future increases of visitor numbers and new activities within the buffer zone or the municipalities of Bansko and Razlog should be monitored and managed, and should not be permitted to lead to impacts on the Outstanding Universal Value of the property.
15. The Pirin National Park Directorate and Ministry of Environment and Water should also ensure that the implementation of restoration (e.g. of old ski runs, lifts etc.) measures should be strictly supervised and monitored by the Directorate in accordance with conditions in the TAP, EIA or any other subsequent administrative decisions. The Ministry of Environment and Water should put in place sufficient legal, contractual or other administrative arrangements to ensure that the Directorate can influence the use and environmental impact of the chalets owned by the Bulgarian Tourism Union. This would also increase the possibility of the Directorate to influence their environmental impact and their role in the providing visitor services in the Pirin World Heritage Site.
16. The mission urges the Ministry of Environment and Water to speed up the process and make available sufficient resources to ensure that the new Pirin National Park Management Plan is completed to ensure that there is no break between the period of the present plan, which ends in 2013, and the approval of the new management plan. During the management planning process, the mission recommends preparation of detailed "Tourism Implementation Plans" for the Dobrinishte buffer zone (presently no detailed Ministry of Environment and Water or Pirin NP Directorate plans exist) and the Bansko buffer zone (based on the approved TAP) which would be included in the new Pirin National Park Management Plan. These would consolidate existing, approved and envisaged plans in a transparent manner and ensure that these areas are explicit parts of the new management plan.

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- Standpoint Mr. Alexander Kravarov, Mayor of Bansko Municipality (written statement given to the mission, October 2011).
- Translated extract from General Spatial Plan for Bansko Ski Zone – 1999.
- Translated extract from Territorial development plan for Bansko ski zone - Last version, after the recommendations of the Supreme council for territorial and town planning, construction, architecture and regional policy, Ministry of Regional Development and Public works and the Supreme environmental expert council to the Ministry of Environment and Water, November, 2000.
- World Heritage Centre. 2008. Operational Guidelines for the Implementation of the World Heritage Convention, UNESCO.
- World Heritage Centre. 2009. World Heritage nomination – IUCN Technical Evaluation, Pirin National Park (Bulgaria) ID No° 225 bis rev.
- World Heritage Centre. 2011. Terms of Reference and background documents prepared by the World Heritage Centre.

ANNEXES

Annex A - Terms of reference of the mission

Annex B - Itinerary and programme of the mission

Annex C - Decision 34 COM 7B 5 on Pirin National Park

Annex D - List of people met by the Mission

Annex E – Draft Statement of Outstanding Universal Value

Annex F - Photographs

TERMS OF REFERENCE

Joint IUCN/ World Heritage Centre Reactive Monitoring Mission

Pirin National Park, Bulgaria

10-14 October 2011

The objective of the monitoring mission is to review the recent capacity upgrades of ski facilities in the property's buffer zone, determine their likely impact on the property's Outstanding Universal Value (OUV) and make a recommendation on the possible inscription of the property on the List of World Heritage in Danger, as requested by the Committee at its 35th session (Decision 35COM 7B.29). The mission will also assess the overall state of conservation of the property and other factors affecting its OUV. The mission team will be composed of Kishore Rao for the World Heritage Centre and Dr. Stig Johansson representing IUCN. In particular, the mission should address the following key issues:

1. Determine whether the recent capacity upgrades of ski facilities in the property's buffer zone are foreseen in the Territorial Arrangement Plan (TAP) and make a recommendation on the possible inscription of the property on the List of World Heritage in Danger, taking into account the likely impacts of these capacity upgrades on the property's OUV and the conclusions of the Environmental Impacts Assessments (EIAs) and any other assessments undertaken for these proposals;
2. Determine whether there are any additional active proposals for ski or other tourism facilities within the property or its buffer zone;
3. Provide input to the revision process for the new management plan, particularly in relation to the World Heritage Committee's request that the revised plan should not allow further ski developments or construction of other facilities within the property and its buffer zone, nor the extension of the tourism zone within the property;
4. Review other factors affecting the overall state of conservation of the property as well as management effectiveness, in particular the status 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 be provided with English translations of final or draft copies of the plans and environmental assessments mentioned above; in particular the Territorial Arrangement Plan. The mission team should further hold consultations with the Bulgarian authorities at federal and state levels, in particular the Pirin National Park management authority as well as all relevant other stakeholders, including representatives of local communities, ranchers, local and national NGOs.

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 Bulgaria 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 reactive monitoring mission following the standard format (IUCN to lead). A first draft should be submitted to the IUCN World Heritage Programme no later than six weeks following the mission.

ANNEX B Itinerary and Programme of the Mission

Date	Time	Meetings & Other Activities	
<u>Monday</u>			
10.10.	15:00 – 18:00	Travel to Bansko, Blaeovgrad Region	
	18:00 – 19:00	Introductory meeting with Ministry of Environment and Water, and the Pirin National Park Directorate staff. Preliminary discussions about the structure and the functions of the PNPD administration.	Pirin National Park Directorate
	19:00	Accommodation in Bansko Spa Hotel, Bansko.	
	20:00	Dinner	Bansko
<u>Tuesday</u>			
11.10.	09:00 – 12:00	Discussions with MoEW and PNPD staff about the new management plan, the replacements of facilities approved in 2010, and other issues in accordance to Decisions 34 COM 7B.19, 34 COM 8B.5 and 35 COM 7B.21 of the World Heritage Committee.	Pirin National Park Directorate
		Presentation of the Sustainable Tourism Strategy for Pirin National Park, Mrs. Lyudmila Dimitrova.	
	12:30 – 13:30	Lunch	Bansko
	13:30 – 18:00	Field visit to the World Heritage Property's buffer zone and Bansko ski zone. Inspecting two facilities that were approved for replacement in 2010; the two drags replaced by a chair lift in the Platoto area (Platoto Lift), and the four seat lift, replaced with six seat facility from Banderishka valley to the area of Kolarski pat (Kolarski Lift).	
		Visit to the famous natural monument in the national park, the Baikusheva mura tree (<i>Pinus heldreichii</i>).	
	19:30 – 20:00	Internal mission meeting.	
	20:00	Dinner	Bansko
<u>Wednesday</u>			
12.10.	09:15 – 10:00	Discussions with MoEW and PNPD staff about the management and management planning of PNP.	Pirin National Park Directorate
	10:00 – 12:00	Meeting with representatives of the local authorities around PNP.	Pirin National Park Directorate
	12:00 – 13:00	Meeting the representatives of the concessionaire of Bansko Ski zone, the Yulen AD company.	Pirin National Park Directorate
	13:00 – 14:30	Lunch	Bansko
	14:30 – 16:30	Departure to Rila Monestry World Heritage Site and the Rila Nature Park	
	16:45 – 17:15	Meeting with the Abbot of Rila Monastery, Bishop Evlogy	
	17:30 – 19:30	Departure to Sofia	
	19:30	Arrival in Sofia and accommodation in Sofia Grand Hotel.	
<u>Thursday</u>			
13.10.	08:00 – 08:45	Meeting with the Minister of Environment and Water, Mrs. Nona Karadjova.	Ministry of Environment and Water
	09:15 – 10:00	Meeting with the Minister of Culture, Mr. Vezhdi Rashidov, and the Deputy-Minister of Culture, Mr. Georgi Stoev, and the Secretary General of the Na-	Ministry for Culture

	ational Commission for UNESCO, Mrs. Roumiana Mitzura.	
10:00 – 12:00	Visiting Alexander Nevski Cathedral, the St. Sofia Church and the Russia Church with the representatives of MoEW	
12:00 – 14:00	Lunch with the Vice-Minister of Foreign Affairs, Mr. Dimitar Tsanchev and the Secretary General of the National Commission for UNESCO, Mrs. Roumiana Mitzura.	Ministry for Foreign Affairs
14:00 – 16:00	Meeting with representatives from the NGO - National Civil Coalition “Environment for the People and Nature”.	Coalition office
16.00 – 18.00	Meeting with representatives from environmental NGOs, Association of Nature Parks in Bulgaria, Balkan Wildlife Society, Bulgarian Biodiversity Foundation, Green Balkans and WWF.	WWF project office
19:00 – 20:00	Closing discussions (internal mission meeting).	
<u>Friday</u>		
09:45 – 10:00	Meeting with Violeta Tsankova, National Commission for UNESCO and Vladimir Kodjabashev, Sozopol Foundation.	Grand Sofia Hotel
	Departure of the mission.	

Decision: 35 COM 7B.21

The World Heritage Committee,

1. Having examined Document WHC-11/35.COM/7B.Add,
2. Recalling Decisions **34 COM 7B.19** and **34 COM 8B.5**, adopted at its 34th session (Brasilia, 2010),
3. Also recalling that the Outstanding Universal Value of the property has been repeatedly and significantly impacted by the development of ski facilities and ski runs within the property and its buffer zone,
4. Expresses serious concern about the recent approval of the replacement and capacity upgrade of two ski facilities in the property's buffer zone, and recalls its Decision, taken at its 34th session following the 2009 evaluation mission to the property, that any additional development of ski facilities, ski runs, or associated infrastructure within the property and its buffer zone would result in the inscription of the property on the List of World Heritage in Danger;
5. Urges the State Party to halt further ski developments in the buffer zone until the World Heritage Committee can consider these at its 36th session in 2012 on the basis of the report of the forthcoming World Heritage Centre/IUCN reactive monitoring mission to the property, and requests the State Party to inform the World Heritage Committee of any new planned developments, and to provide an Environmental Impact Assessment for all development proposals in the property and its buffer zone, including an assessment of the proposals' potential direct, indirect and cumulative impacts on the Decisions report WHC-11/35.COM/20, p. 66 property's Outstanding Universal Value, in line with Paragraph 172 of the *Operational Guidelines*;
6. Reiterates its request to the State Party to ensure that the new management plan does not allow further ski development or construction of other facilities within the property and its buffer zone, nor extension of the tourism zone into the property;
7. Encourages the State Party to commission an independent assessment of the capacity of the property and its buffer zone in order to set clear usage limits for the Bansko ski zone;
8. Also requests the forthcoming World Heritage Centre/IUCN reactive monitoring mission to the property to determine whether the recent capacity upgrades of ski facilities in the property's buffer zone are foreseen in the Territorial Arrangement Plan (TAP) and make a recommendation on the possible inscription of the property on the List of World Heritage in Danger, and further requests the State Party to provide the mission with an English translation of the TAP;
9. Requests furthermore the State Party to submit to the World Heritage Centre, by **1 February 2012**, a report on the state of conservation of the property, including confirmation that all inappropriate developments have been halted, for examination by the World Heritage Committee at its 36th session in 2012.

ANNEX D List of people met by the mission

Avramov, Stefan	Mr		Bulgarian Biodiversity Foundation
Banenski, Rosen	Mr	Chief Inspector	Vihren Park Region, Pirin National Park Directorate
Barjakov, Petar	Mr	Acting Mayor	Bansko Municipality
Belev, Toma	Mr	Chairman	Green Balkans Society
Bizheva, Vanya	Mrs	Vice-Chair	National Civil Coalition Environment for the People and Regions
Danailova, Deiana	Mrs	Director	Cultural Policy Directorate, Ministry of Culture
Dekova, Liljana	Mrs	Expert	Educational Programs and Interpretation, Pirin National Park Directorate
Dimitrova, Lyudmila	Mrs	Manager	Eco-Innovation
Donevichin, Pavlina	Mrs	Expert	Flora, Expert Department, Pirin National Park Directorate
Donnchev, Alexander	Mr		Association of Nature Parks in Bulgaria
Evlogy	Mr	Bishop	Rila Monastery
Ganchev, Hristo	Mr	Head	Immovable Cultural Heritage Unit, Ministry of Culture
Garmenov, Ventsislav	Mr	Acting Mayor	Municipality of Razlog
Gerchev, Krasimir	Mr	Expert	Municipality of Razlog
Hadzhiev, Ivan	Mr	In charge of rope facilities	Yulen AD company
Hristov, Strahil	Mr	Head	Expert Department, Pirin National Park Directorate
Ikonomov, Georgi	Mr	MP	Member of Parliament
Ivanova, Tsvetelina	Mrs	State Expert	Protected Areas Department, National Nature Protection Service Directorate, MoEW
Kalinova, Tsvetelina	Mrs	Expert	Tourism Activities and Interpretation, Pirin National Park Directorate
Karadjova, Nona	Mrs	Minister	Ministry of Environment and Water
Kodjabashev, Vladimir	Mr	Administrative Director	Sozopol Foundation
Kostadinov, Lyubomir	Mr		Citizen of Bansko
Kovachev, Andrey	Mr		Balkan Wildlife Society
Kravarov, Alexander	Mr	Mayor	Municipality of Bansko
Lazarov, Martin	Mr	Head	Management and Control Department, Pirin National Park Directorate
Lekov, Emil	Mr	Chief Architect	Municipality of Bansko
Maleeva, Uliana	Mrs	Director	Cultural Heritage Directorate, Ministry of Culture
Mariyanov, Boyan	Mr	Executive Director	Yulen AD company
Mechev, Valery	Mr	Director	Pirin National Park Directorate
Michaylov, Michail	Mr	Director	National Nature Protection Service Directorate, Ministry of Environment and Water
Mitreva, Roumiana	Mrs	Secretary General	Bulgarian National Commission for UNESCO, Ministry for Foreign Affairs
Obreykov, Ivan	Mr	Marketing Manager	Yulen AD company
Petrov, Petar	Mr	Attorney member of BoD	and Yulen AD company
Popadiina, Nadejda	Mrs	Chief	Ecology and Agriculture Department, Municipality of Razlog
Rakovska, Katerina	Mrs	Coordinator	Protected Areas and Natura 2000, WWF, Bulgaria.

Rashidov, Vezhdi	Mr	Minister	Ministry of Culture
Sakarev, Nikola	Mr	Mayor	Municipality of Dobrinishte
Semerdzhiiev, Todor	Mr	Ecologist	Yulen AD company
Shtereva, Veselina	Mrs	Head	Institutional relations, National Civil Coalition Environment for the People and Regions
Stoev, Dimitar	Mr	Chief	Protected Areas Department, National Nature Protection Service Directorate, MoEW
Stoev, Georgi	Mr	Deputy-Minister	Ministry of Culture
Strahil Hristov	Mr	Head	Expert Department, Pirin National Park Directorate
Tsanchev, Dimitar	Mr	Vice-Minister	Ministry for Foreign Affairs
Tsankova, Violeta	Mrs	Ag. Cultural Adviser	National Commission for UNESCO. Ministry of Foreign Affairs
Tsanov, Filip	Mr	Chairman	National Civil Coalition Environment for the People and Regions
Tzvetkov, Petko	Mr	Ag. Executive Director	Bulgarian Biodiversity Foundation
Vladimirov, Vladimir	Mr	Scientist	Institute of Biodiversity and ecosystem researches, Bulgarian Academy of Sciences and Secretary of the Bulgarian National MAB Committee
Yovchevski, Hristo	Mr	Attaché	Science Sector, National Commission for UNESCO. Ministry of Foreign Affairs
Yovchevski, Hristo	Mr	Attaché	Science Sector, National Commission for UNESCO, MoFA
Zvancharov, Andrey	Mr	In charge of Advertising	Yulen AD company
Zvancharov, Spasimir	Mr	Chief	Territorial and Agricultural Planning Department, Municipality of Razlog

Brief synthesis

The World Heritage property covers an area of around 40,000 ha in the Pirin Mountains, southwest Bulgaria, and overlaps with the undeveloped areas of Pirin National Park. The diverse limestone mountain landscapes of the property include over 70 glacial lakes and a range of glacial landforms, with many waterfalls, rocky screes and caves. Forests are dominated by conifers, and the higher areas harbour alpine meadows below the summits. The property includes a range of endemic and relict species that are representative of the Balkan Pleistocene flora.

Criterion (vii):

The mountain scenery of Pirin National Park is of exceptional beauty. The high mountain peaks and crags contrast with meadows, rivers and waterfalls and provide the opportunity to experience the aesthetics of a Balkan mountain landscape. The ability to experience remoteness and naturalness is an important attribute of the Outstanding Universal Value of the property.

Criterion (viii):

The principal earth science values of the property relate to its glacial geomorphology, demonstrated through a range of features including cirques, deep valleys and over 70 glacial lakes. The mountains of the property show a variety of forms and have been developed in several different rock types. Functioning natural processes allow for study of the continued evolution of the landforms of the property, and help to understand other upland areas in the region.

Criterion (ix):

The property is a good example of the continuing evolution of flora, as evidenced by a number of endemic and relict species, and the property also protects an example of a functioning ecosystem that is representative of the important natural ecosystems of the Balkan uplands. Pirin's natural coniferous forests include Macedonian Pine and Bosnian Pine, with many old growth trees. In total, there are 1,315 species of vascular plants, about one third of Bulgaria's flora, including 86 Balkan endemics, 17 Bulgarian endemics and 18 local endemics. The fauna of Pirin National Park includes 45 mammal species, including brown bear, wolf and pine marten, and 159 bird species. Pirin is also home to eight species of amphibians, eleven species of reptiles and six fish species. Although the forests are affected by some historical use, the natural functioning of the ecosystem ensures the protection of its regionally significant biodiversity values.

Integrity

The original inscription of the property in 1983 proved to be inadequate in representing and maintaining the Outstanding Universal Value of Pirin, but an extension in 2010 has addressed the issues to the best possible degree and represents the minimum area of Pirin National Park that can be considered to correspond to the requirements of Outstanding Universal Value set out in the World Heritage Convention.

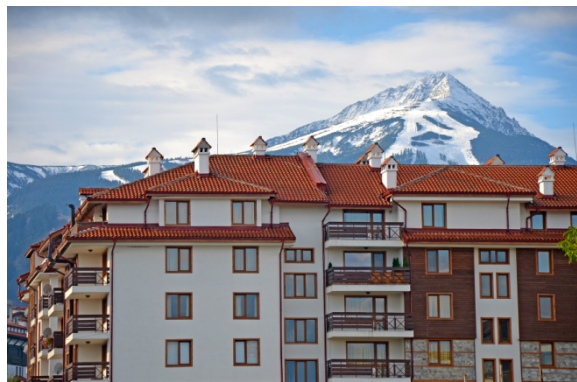
The National Park is clearly defined from the point of view of its mountainous nature and ecology, and the boundaries of the property are of sufficient size to capture the natural values of Pirin. Adequate boundaries have been established through the extension of the initially inscribed property, to include the most remote areas of the interior of the National Park, and exclude adjacent areas that are not compatible with World Heritage status due to impacts on integrity from ski development. The values of the property as extended retain the attributes of a natural landscape but they closely adjoin areas subject to intensive tourism development that are a risk to the integrity of the property.

Protection and management requirements

The property is covered by national legislation which should ensure strong national protection of the values of the property, including the prevention of encroachment from adjoining development. It is essential that this legislation is rigorously enforced and is respected by all levels of government that have responsibilities in the area. The property also has an effective and functioning management plan, provided its implementation can be ensured through adequate resources to both maintain the necessary staffing levels and undertake the necessary management activities to protect and manage the property. A system of regular monitoring of the natural values of Pirin and ongoing programmes to maintain habitats and landforms in their natural state, avoid disturbance and other impacts on wildlife, and to preserve the aesthetic values of the property are required.

The World Heritage property has long been subject to tourism pressure, largely caused by the development of ski facilities and ski runs. Small ski areas were developed at Bansko, Dobrinishte and Kulinoto in the 1980s and 1990s. Activities such as night skiing, off-piste skiing and heliskiing are activities which may affect the values and integrity of the property and require rigorous control. Bansko, adjoining the property, has become one of the most rapidly developing towns in Bulgaria with hotels and holiday resorts constructed literally on the park boundary. Tourism development within and around the property has not been effectively controlled in the past including some areas that were developed within the property and caused significant damage. The management plan for the property needs to ensure a long-term priority for the protection of the natural values of Pirin, and to guard against any encroachments and impacts within the property from skiing, sporting events or other inappropriate development. Equally the planning documents that are created by national, regional and local authorities need to similarly ensure the protection of the natural values of the property, and also integrate the benefits it provides as a natural landscape to the surrounding area.

Other threats to the property include illegal logging, poaching and the use of snow mobiles and quad bikes. These uses require close monitoring, management and the enforcement of effective regulations. The management of visitor use to both prevent negative impacts and provide opportunities to experience the values of the property in a sustainable way is also an essential long term requirement for this property.

BANSKO AND PIRIN**Photo 1.** Bansko and the ski runs on Todorka.**Photo 2.** New Bansko houses and ski runs.**Photo 3.** New and undeveloped housing in Bansko.**Photo 4.** Gondola lift starting from Bansko.**Photo 5.** Clearing of the gondola lift.**Photo 6.** Apartments for sale in Bansko.

BANDERITSA POLIANA



Photo 7. Banderista poliana.



Photo 8. Banderitsa poliana seen from Koplarski.

KOLARSKI LIFT



Photo 9. Kolarski lift.



Photo 10. Kolarski lower terminal.



Photo 11. Erosion control at Kolarski lift.



Photo 12. Restoration at Kolarski lower terminal.



Photo 13. Restoration at Kolarski lower terminal



Photo 14. Todorka seen from Kolarski upper terminal.

PLATOTO



Photo 15. Kolarski lift and Buderitsa Poliana



Photo 16. Platoto lift and ski run.



Photo 17. Platoto lower terminal



Photo 18. Platoto lift and ski run.

TODORKA LANDSCAPES



Photo 19. Todorka lift and landscape.



Photo 20. Todorka lift and landscape.

STARA AND DETSKA KOTVA

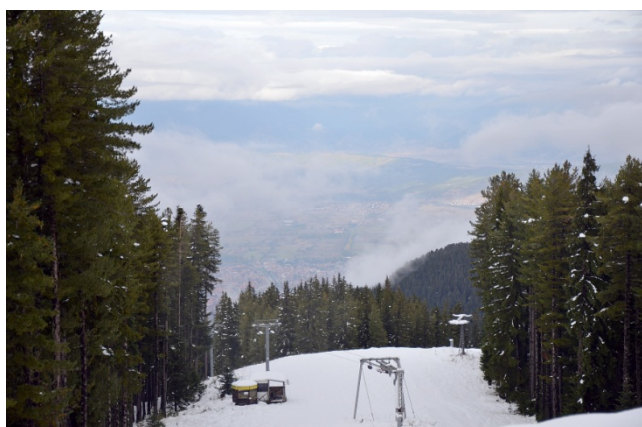


Photo 21. Stara Kotva (left) and Detska Kotva (right) lifts.