



REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

To
H.E. Sheika Al Mayassa Bint Hamad Al-Thani (Qatar)
Chairperson of the 38 session of the World Heritage Committee

To
Mr. Kishore Rao
Director of the UNESCO World Heritage Centre
7 Place de Fontenoy
75352 Paris 07 FRANCE

Министерство на околната среда и водите
Изх. № 99-0-18
София 03.02 2014 г.

cc
Ambassador Alexander Savov
Permanent delegate of Bulgaria to UNESCO
1, Rue Miollis
75732 Paris Cedex 15 France

Mrs. Rumjana Mitreva
General Secretary of the Bulgarian
National Commission for UNESCO
Ministry of Foreign Affairs

Re: authorization letter for uploading the state of conservation report of Pirin National Park World Heritage Property on the web-site of the World Heritage Centre

**Dear Mr. Chairperson,
Dear Mr. Rao,**

In response to Circular Letter of 2 December 2013 from the Chairperson of the World Heritage Committee and in the spirit of the enhanced transparency of the World Heritage processes, with the current letter and on behalf of the Ministry of environment and water of Bulgaria, I would like to authorize the World Heritage Centre to upload with public access, the State of conservation report of Pirin National park World Heritage Property for 2013, elaborated in compliance with c Decision: 37 COM 7B.17 of the World Heritage Committee, on the web-site of the World Heritage Centre and the newly established State of Conservation Information System-<http://whc.unesco.org/en/soc>).

I would like to take this opportunity to thank you for your kind support for the protection of the World Heritage Properties of Bulgaria.

Sincerely yours,

**ISKRA MIHAYLOVA
MINISTER OF ENVIRONMENT AND WATER**





REPUBLIC OF BULGARIA

MINISTRY OF ENVIRONMENT AND WATER

To
Mr. Kishore Rao
Director of the UNESCO World Heritage Centre
7 Place de Fontenoy
75352 Paris 07 FRANCE
fax: + 33 (0) 1.45.68.55.70

*WKC/EUR
received by email
on 24 January 2014*

cc
Ambassador Alexander Savov
Permanent delegate of Bulgaria to UNESCO
1, Rue Miollis
75732 Paris Cedex 15 France

Mrs. Rumjana Mitreva
General Secretary of the Bulgarian
National Commission for UNESCO
Ministry of Foreign Affairs

January 2014

Re: State of Conservation Report of the World Heritage Property of Pirin
National Park (Bulgaria)

Dear Mr. Rao,

According to Decision 37 COM 7B.17 of the World Heritage Committee, from its 37th session, held in Cambodia (2014), please find enclosed the State of conservation report of Pirin National Park World Heritage Property, elaborated in compliance with the indicative form for preparing a State Party's Report on the State of conservation of its property inscribed on the World Heritage List.

I would like to take this opportunity to thank you for your kind support for the protection of the World Heritage Properties of Bulgaria.

Sincerely yours,

ISKRA MIHAYLOVA 
MINISTER OF ENVIRONMENT AND WATER

**REPORT ON THE STATE OF CONSERVATION OF PIRIN NATIONAL
PARK WORLD HERITAGE PROPERTY**

**Pirin National Park World Heritage Property (Republic of Bulgaria)
(Identification number 225)**

**I. Response from Republic of Bulgaria to the World Heritage Committee's
Decision: 37 COM 7B.17, paragraph by paragraph**

The World Heritage Committee,

- 1. Having examined Document WHC-13/37.COM/7B.Add,**
- 2. Recalling Decision 36 COM 7B.18, adopted at its 36th session (Saint-Petersburg, 2012),**

The Ministry of Environment and Water (MOEW) as the institution in charge of the management of Pirin National Park (PNP) as protected area according to national legislation and as World Heritage Property (WHP), also considered Document WHC-13/37.COM/7B.Add and Decision 36 COM 7B.18 of the World Heritage Committee (WHC), adopted at its 36th session (Saint-Petersburg, 2012), pointed in paragraphs 1 and 2 of Decision: 37 COM 7B.17 of the WHC.

- 3. Notes that a proposed amendment to the management plan of Pirin National Park which would allow further skiing developments within the buffer zone of the property, is currently under consideration by the State Party;**

We would like to remind that according to the currently existing ban over the constructions in Bansko and Dobrinishte ski zones (buffer zones of the WHP), the proposal of Bansko municipality for amendment of the management plan, envisaged lightening of regimes on this territory, constituting 2.66% of the total area of the National park and WHP. The proposal did not contain specific investment proposals or plans.

The proposal of Bansko municipality for amendment of the management plan, was in compliance with the legislative regulations, did not contradict to the decisions of the World Heritage Committee, which gave grounds to the MOEW to initiate a procedure for its consideration in 2013.

Despite the above, at this stage, the MOEW is not envisaging further proceedings of the proposal of Bansko municipality for amendment of the management plan of Pirin National Park.

Possible development of Bansko ski zone is expected to be resolved on by the newly elaborated management plan for the Property.

4. Requests the State Party to ensure that the proposed amendment is in line with the 2010 Strategy for Sustainable Nature Tourism and that an appropriate monitoring mechanism is put in place, as requested by the Committee and the 2011 Reactive monitoring mission, before approval of the proposed amendment;

The proposed amendment of Bansko municipality is consistent with the Strategy for sustainable tourism development and is not contradicting the decisions of the World Heritage Committee of UNESCO (from 2012 and 2013).

According to these decisions, the Committee takes the ski zones as reality on the ground and allows their possible further development, but only in case that this development is assessed, in order to avoid a significant impact on the WHP, i.e. outside of the buffer zone.

As the MOEW has already informed the Secretariat with the state of conservation report of Pirin National Park from 2013, within the implementation of the project for the Sustainable Management of the Pirin National Park and WHP, will be analyzed and evaluated the impact of the Bansko ski zone and other activities in the buffer zone on the World Heritage Property. On the basis of the results, will be assessed the need and the method for introducing of appropriate monitoring mechanism.

As noted above, at this stage, further proceeding of the proposal of Bansko municipality is not foreseen and correspondingly it will not be submitted for approval by the Council of Ministers of the Republic of Bulgaria.

5. Also requests the State Party to undertake a Strategic Environmental Assessment of the development of the buffer zone, including consultations with stakeholders, and urges the State Party to ensure that these proposals will not negatively impact the Outstanding Universal Value (OUV) and in particular the integrity of the property;

The currently acting Management Plan of Pirin National Park does not allow the construction of new ski runs and cableways in the World Heritage Property and its buffer zone - the ski zones of Bansko and Dobrinishte.

Within the project for Sustainable Management of Pirin National Park, funded by the Operational Program Environment – OPE (EU funds), a new management plan for Pirin National Park, will be developed.

In 2012, the MOEW approved Terms of reference for the new management plan of Pirin National Park.

Due to some procedural delays, the deadline for drafting of the new management plan has been extended until October 2015, instead of the same period in 2014, as originally planned.

It is possible with the new management plan to be allowed further construction of ski runs and facilities, but only in the buffer zone of the World Heritage Property, determined with Decision 34 COM 8V.5 of the WHC.

As the Management Plan of Pirin National Park is a framework document for guiding the policy for protection of the Property and it does not provide for specific investment

proposals, it is not subject of Environmental Assessment (EA) and Appropriate assessment (AA) procedure.

According to the national legislation – Protected areas Act (PAA), the type and the content of the activities, related to usage of natural resources and construction activities in protected areas, are determined by special spatial and technical development plans and projects.

In this line, after the adoption of the new management plan, and in case that it foresees new development for the buffer zone of the WHP, for this development will be developed a Territorial Arrangement plan (TAP) with specific parameters and location of the facilities envisaged. The abovementioned TAP will be obligatory a subject of EA and AA.

According to the specific legislation – Protected areas Act (PAA), in the process for preparation of the new management plan, are envisaged public hearings with the participation of representatives from the central and local authorities, owners or their associations, scientific, academic and non-governmental organizations and others.

All the issues, which are of importance for the National Park, including the perspectives for further development, will be considered during the discussions to be held, in order to achieve consensus and find the right balance on this sensitive topic.

In relation to the above, in February 2013, was reestablished the Consultative Committee (CC) under the Pirin National Park Directorate (PNPD) and its composition was renewed.

According to the rules of procedure of the CC, in its composition are included, on quotas principle, representatives of state institutions, municipalities, NGOs and business organizations.

In 2013, were held two meetings of the CC, at which issues, related to the development of skiing in the Pirin National Park, were addressed.

Besides the above, we would like to assure you that the development of the management plan will strictly follow the requirements, imposed by the national and international legislation and treaties and will not allow a negative impact on the outstanding universal value of the Property and its integrity.

6. Reiterates its request to the State Party to confirm that no further ski development inside the property will be permitted and recalls its position that if any additional development of ski facilities, ski runs, or associated infrastructure within the property are undertaken, the conditions for inscription of the property on the List of World Heritage in Danger will be fulfilled;

The decisions of the World Heritage Committee are very clear and explicit and the State party is aware that if the construction of ski runs and facilities, outside the buffer zone - ski zones of Bansko and Dobrinishte, are allowed, Pirin National Park WHP will be included in List of the World Heritage in danger.

The above requirement will be taken into account by the new management plan, which will not allow such development.

7. Urges the State Party to expedite the implementation of the outstanding recommendations of the 2011 joint World Heritage Centre/IUCN reactive monitoring mission to the property which have not been fully implemented to date;

In the approved in 2012 Terms of reference for a new management plan of Pirin National Park, are set out requirements for the implementation of all the recommendations of the joint WHC/IUCN reactive monitoring mission, as reflected in Decision 36 COM 7B.18.

8. Further requests the State Party to submit to the World Heritage Centre, by 1 February 2014, a report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 38th session in 2014.

This report on the State of conservation of Pirin National Park as a World Heritage Property, has been prepared pursuant to § 8 of Decision: 37 COM 7B.18 of the WHC.

As regards the implementation of the requirements and recommendations of the joint World Heritage Centre/IUCN reactive monitoring mission from 2011, we would like to provide the following information:

As far as the demarcation, communication and maintenance of the boundaries of the WH Property and its buffer zone, as defined in Decision 34 COM 8B.5, are concerned, please be informed that there are approved GPS coordinates.

Under the project for Sustainable Management of Pirin National Park, funded by the OPE and in particular within Activity 2:17 of the project, will be carried out demarcation at the field of Pirin National Park as WHP, including of the buffer zones of the Property, based on the approved coordinates.

The demarcation of the boundaries of Pirin National Park and its reserves results from: Order N379 from 1999 of the minister of environment and water, for declaring of the national park in its current boundaries. This is also required by Pirin National park management plan - Chapter 4.3 - Programmes and Projects - item 2 "Information Assurance".

The demarcation of the buffer zone of the World Heritage Property - ski zones "Bansko" and "Dobrinishte", respectively evolves from Decision 36 COM 7B.18 of 36th session of the World Heritage Committee (St. Petersburg, Russia, 2012).

The demarcation of the boundaries of the National Park, the World Heritage Property and its buffer zone, will comply with the standards in Bulgaria and will be carried out by placing of wooden signs and line marking on the ground or on the trees.

In addition, on all of the wooden signs and marked trees will be installed plates (with size of 10x15 centimeters), with indication about the Property and its buffer zone.

The State Party will ensure that these boundaries are respected.

Please mind that with the State of conservation report from 2013, the MOEW presented detailed information to the World Heritage Center for the implementation of the other recommendations of the mission from 2011. Given the fact that most of the recommendations are directly linked to the elaboration of the new management plan and because of the recorded delay in the development of the document, at this stage, significant progress in their implementation can not be reported.

As regards the recommendations of the mission, related to the presence of sufficient legal, contractual or other administrative arrangements, which to ensure the protection of the Property, we would like to confirm that the institutions in charge of the area – the MOEW, PNPD and the Regional inspectorate of environment and waters for the town of Blagoevgrad, are authorized in sufficient degree by the existing legislation – Protected Areas Act (PAA), Biological diversity Act (BDA) Act, Environmental Protection Act (EPA) and the Water Protection Act (WPA), to provide effective control over the activities, performed in Pirin National Park, including to terminate activities, leading to damage of environmental parameters.

Given the importance of the National Park and WHP and given the status of the territory as exclusively state property, we would like to confirm that the above mentioned institutions, apply effective control over the activities, carried out by both the concessionaire - Ulen Company and other users of the area, so as to ensure its protection in long term.

As for the recommendation, which require from the State Party to ensure that the new Management Plan of the Property is completed and approved on time and before the expiry of the current one, as the MOEW has already informed the Secretariat, a change in the Regulation for preparation of management plans for protected areas, from 2012, stipulates that the acting management plans remain in full effect until new ones, are adopted and entry into force. The above guarantees that Pirin NP and WHP will not pass a period without management plan.

II. Other current conservation issues identified by the State Party

In 2013, the MOEW has not registered any new conservation issues related to the protection and conservation status of the Property.

III. In conformity with paragraph 172 of the Operational Guidelines, please describe any potential major restorations, alterations and/or new construction(s) within the protected area (core zone and buffer zone and/or corridors) that might be envisaged.

In 2013, the MOEW considered and approved only insignificant investment proposals, aimed at ensuring the functioning of existing facilities and improving the quality of the service, provided to tourists.

Information about the abovementioned proposals is pointed below:

The abovementioned investment proposals concern only the buffer zone of the World Heritage Property. They were proceeded in line with the Bulgarian environmental legislation and were subject to a screening procedure for EIA under the Environmental Protection Act and an Appropriate Assessment for their compatibility with the conservation subject and objective of Pirin National Park, WHP and Natura 2000 site, under the Regulation for Appropriate assessment.

It was estimated that the abovementioned investment proposals do not contradict to the regimes, declared with the Management plan of Pirin National park and WHP and by the order for declaration of Pirin as Natura 2000 site; will not cause damage to species and habitats under conservation in the National park, World Heritage Property and Natura 2000 site.

In 2013, major projects, related to restorations, alterations and/or new construction in the WHP and its buffer zone have not been submitted to the MOEW.

ISKRA MIHAYLOVA



MINISTER OF ENVIRONMENT AND WATER