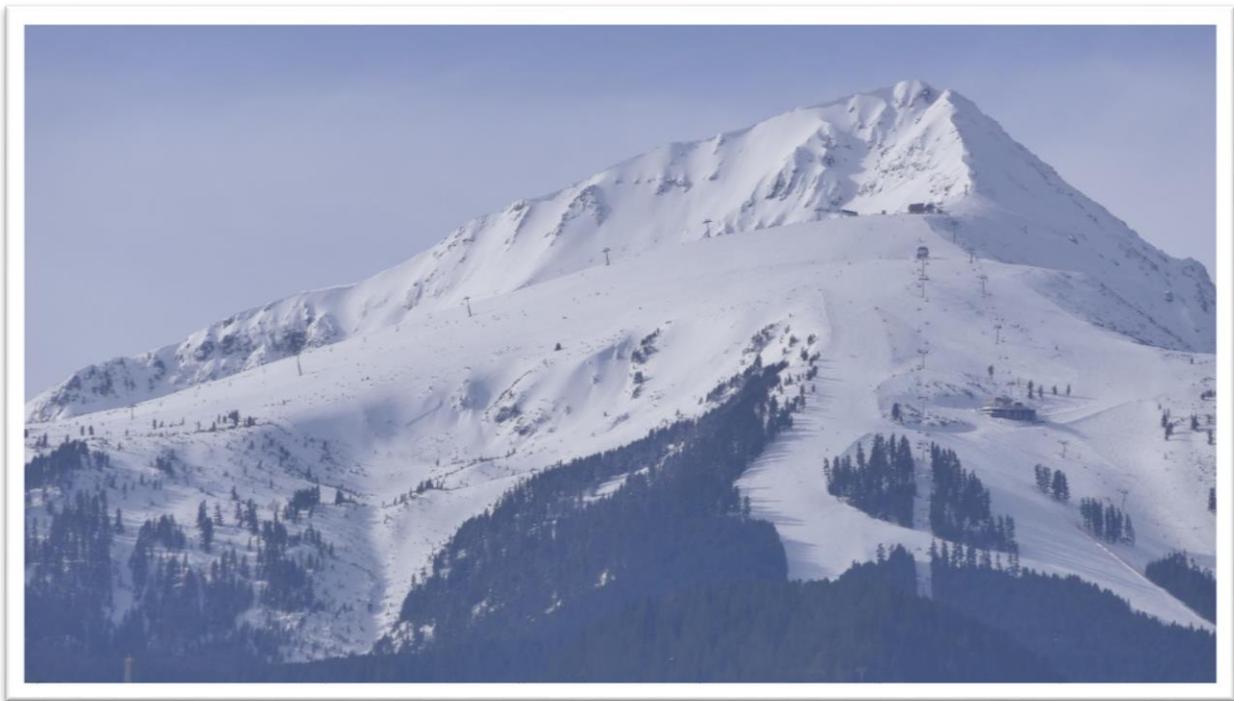




**IUCN Advisory Mission
to the World Heritage property
"Pirin National Park", Bulgaria**

5-9 March 2018

MISSION REPORT



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FOREWORD

This report presents the major findings and recommendations of the IUCN Advisory mission to Pirin National Park World Heritage property which took place from 5 to 9 March 2018, upon an invitation from the Ministry of Environment and Water (MOEW) of Bulgaria.

According to the Terms of Reference of the mission (**Annex 1**), the expert reviewed the draft of the updated management plan (MP) for Pirin National Park (PNP)¹, in relation to the preservation of the Outstanding Universal Value (OUV) of the property and held discussions with the relevant stakeholders.

The mission met with representatives of the Government, the National Commission for UNESCO, the local municipalities, NGOs, Proles Engineering Limited, the Uhlen company, experts and specialists (**Annexes 2 and 3**); the expert also made a short visit the buffer zone of the property in the Bansko ski resort.

¹ Based on an English version provided by the State Party to the expert (**Annex 5**).

ACKNOWLEDGEMENTS

The expert acknowledges all officials and colleagues met during his mission, whether named here below or not.

He wishes to express his gratitude to Mr Simeonov, Deputy Prime Minister and Mr Dimov, Minister of Environment and Water (MOEW) for meeting him in Bansko.

The expert was honoured to exchange several times with Mr Ikonov, mayor of the Bansko municipality, as well as with all representatives from the other local municipalities.

He is grateful to the NGOs represented by the Coalitions "*Keep the nature in Bulgaria*" and "*Nature for people and regions*", as well as to all other organizations who shared with him their extensive expertise and wide knowledge of the context.

He also expresses his thanks to Mr Kalugerov, Director of the Protected Areas department/MOEW and Ms. Ivanova, State expert for Protected Areas/MOEW, for their continuous presence and assistance; both were instrumental in organizing the mission; their availability and assistance throughout the visit of the expert were very much appreciated.

Further thanks go to Mr Babenski, Director of the PNP, Mr Hristov, Deputy Director and the PNP staff for their welcome and hospitality and for their contribution in organizing the various meetings at the park visitor centre in Bansko.

It was a pleasure to meet and exchange with Ms Andreeva, Secretary General of the National Commission for UNESCO.

The expert greatly appreciated the discussions with experts from Proles Engineering Limited; he is grateful to the representatives of Uhlen company for the visit of the Bansko resort and the exchange of concept and experience.

All the discussions were extremely useful and helpful to the mission's understanding of the overall context, from all points of view, environmental, institutional and socio-economic.

Finally, special thanks to Ms Tzekova for her high-standard professional support along the discussions.

INTRODUCTION

1 BACKGROUND OF THE MISSION

An update of the PNP Management Plan is currently under discussion; this draft document has been elaborated by the MOEW after various consultations and hearings at national and local levels, since 2014.

A series of major controversies have arisen during this process, leading to several massive protests from the civil society in Sofia², throughout the country³ and abroad; the future orientations and the management choices for the PNP were contested, especially regarding the development of grazing and tourism, as well as forest and water resource management.

A group of civil society organizations has contested the decision by the MOEW not to subject the draft new management plan to a full Strategic Environmental Assessment (SEA) in the Court and therefore this plan has not been yet completed due to this Court case in progress and cannot be adopted pending the Court decision.

On 29 December 2017⁴, the MOEW decided to amend the current MP dating from 2004 (**Annex 4**) to allow expansion of ski slopes and lifts, as well as all related facilities and equipment (lighting) in the buffer zone of the property, as part of a development plan subject to adoption; this decision has also been contested before the Court, and therefore nor it has not been implemented to date by the MOEW.

In its decision 40 COM 7B.93, the World Heritage Committee (WHC) called on the State Party to invite in 2017 an IUCN Advisory mission "to review the implementation of the Management Plan and the preservation of the OUV of the property".

However, in the social and judicial contexts mentioned above, the State Party invited the advisory mission⁵ to "review[ing] the draft of the updated Management Plan (MP) for Pirin National Park (PNP)".

The advisory mission took place from 5 to 9 March 2018; it was assigned to Hervé LETHIER, representing IUCN, with the following tasks:

- review the draft of the updated MP and the introduced amendments to the current MP, particularly as it relates to the preservation of the OUV of the property;
- hold consultations with all relevant stakeholders, including representatives of the MOEW, Directorate of the PNP, representatives of the NGOs and municipalities.

The mission met Mr Simeonov, Vice Prime Minister, Mr Dimov, Minister of Environment and water, Mr Ikonov, Mayor of Bansko and all mayors or representatives from the other local municipalities, as well as representatives of two NGOs coalitions (Keep the nature in Bulgaria and Nature for people and regions); it met as well Mr Bistrin, Adviser for mountain and ski tourism, Ministry of tourism, and Ms Karastoyanova, Vice Chair of the board of the National Board of Tourism.

The mission held further discussions with managers from the Uhlen AG Company, operating the "Ski Centre Bansko", guided by Mr Hadzhiev, for the visit of the ski resort.

² <http://www.independent.co.uk/travel/news-and-advice/bulgaria-pirin-national-park-ski-resort-expansion-protests-environmentalists-sopia-unesco-world-a8155876.html> ; <http://www.novinite.com/articles/187156/Fifth+Protest+in+Defense+op+Pirin+Block+%22Orlov+Bridge%22+in+the+Capital>; <https://www.youtube.com/watch?v=FeU3k7nusak>;

³ <http://www.novinite.com/articles/188722/Another+Protest+Against+Construction+in+Pirin>;

⁴ MOEW, Decision n°821.

⁵ Letter from the State Party to the World Heritage Centre dated 17 November 2017

The mission was continually accompanied during its visit by Mr Kalugerov, Director of the Department on Protected Areas, Ms Ivanova, State expert in the Protected Areas Department/MOEW, as well as by the PNP officials; Mr Bechev, State expert in the Protected Areas Department/MOEW and Mr Mihaylov, external expert and former director of the Protected Areas Department/MOEW, took also part in the visit and in several meetings.

Ms Andreeva, Secretary general of the National Commission for UNESCO – Bulgaria, attended part of the visit.

2 CURRENT CONTEXT

2.1 Inscription history

The property was inscribed on the World Heritage List in 1983 under criteria (vii), (viii) and (ix) (**Map 1**) and extended in 2010 (**Map 2**); it spreads over 38,350.04 ha and has a buffer zone covering additional 1,078.28 ha. It is considered as:

- being a good example of the continuing evolution of flora and an example of high mountain ecosystems in natural condition (criterion (ix)); the property hosts a number of endemic and relict species from the Balkans's uplands. Although affected in the past, this ecosystem contains old coniferous forests of Macedonian and Bosnian pines;
- offering a scenery of exceptional beauty (criterion vii); remoteness and naturalness are important attributes of the OUV of the property and they contribute to maintaining its overall integrity;
- providing diverse limestone mountain landscapes (criterion viii), linked to its glacial, geomorphological origins, illustrated by a large array of characteristic features including cirques, deep valleys and mountain lakes where the natural processes are still functioning.

Lastly, even though not designated under criterion (x), the property contains very important and significant natural habitats for *in-situ* conservation of biological diversity, where many threatened and/or endemic species of flora and fauna can be found.

According to the Operational Guidelines (OG) for the implementation of the Convention, the property should be kept relatively intact and the activities occurring in it should be consistent with the preservation of its OUV and ecologically sustainable (OG, art. 90); further conditions of integrity are defined by the OGs; they will be referred to in the report when needed.

2.2 Previous World Heritage Committee decisions

Over the past fifteen years, the World Heritage Committee has adopted several decisions on this property. In its Decision 33COM 7B.21 it noted that the "*possible inscription of the property on the List of World Heritage in Danger*" might be considered if no "*substantial progress*" was made with regards to protection of the property "*from inappropriate development and human use within and beyond its boundaries*"⁶.

A balance was found in 2012, based on the recommendations of the 2011 joint World Heritage Centre/IUCN reactive monitoring mission; in summary and regarding the management of the property, the Committee⁷:

⁶ Decision: 33 COM 7B.21.

⁷ Decision: 36 COM 7B.18.

- reiterated 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;
- urged the State Party to ensure, including through provisions in the new MP, that no further areas within the property, outside the already excluded areas, are permitted for ski or other similar high-impact developments;
- requested the State Party to implement the recommendations of the 2011 joint World Heritage Centre/IUCN reactive monitoring mission to the property, in particular:
 - ensure effective wider regional planning for economic development, and ensure that no developments that exceed the capacity of the area are permitted,
 - promote and implement the 2010 strategy for sustainable nature tourism as a viable alternative to ski-based tourism development,
 - ...
 - put in place processes to monitor the impacts of the ski and other activities within the buffer zone on the surrounding property, in order to ensure that they do not negatively impact on the OUV of the property, and put in place sufficient legal, contractual or other administrative arrangements to ensure that the PNP Directorate can influence the use and environmental impact of the chalets owned by the Bulgarian Tourism Union,
 - ensure that the implementation of restoration measures is strictly supervised and monitored by the PNP in accordance with conditions in the Territorial Arrangement Plan (TAP), Environmental Impact Assessments (EIA) or any other subsequent administrative decisions,
 - expedite the process and make available sufficient resources to ensure that the new MP of the property is completed and approved on time for its implementation immediately after the current MP ceases being in effect in 2013,
 - prepare detailed "Tourism Implementation Plans" for the Bansko and Dobrinishte buffer zones, consolidating existing, approved and envisaged plans in a transparent manner, and ensure that these buffer zone areas are explicit parts of the new MP.

Furthermore:

- in 2013⁸, the Committee reiterated its request to the State Party to confirm that no further ski development inside the property will be permitted and it recalled 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 Committee also urged the State Party to expedite the implementation of the recommendations of the 2011 joint World Heritage Centre/IUCN reactive monitoring mission to the property which had not been fully implemented. In this decision, the Committee noted as well that a proposed amendment to the PNP MP which would allow further skiing developments within the buffer zone of the property, was under consideration by the State Party and it requested 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;
- in 2014⁹, the Committee noted the information provided by the State Party that further developments in the buffer zone of the property could be considered within the new MP for PNP, and given the potential impacts on the OUV of the property,

⁸ Decision: 37 COM 7B.17.

⁹ Decision: 38 COM 7B.73.

requested the State Party to ensure that the new management plan is subject to Strategic Environmental Assessment (SEA) prior to being adopted, in line with the European Union (EU) SEA Directive, the EU Habitat Directive, and IUCN's World Heritage Advice Note on Environmental Assessment;

- in 2016¹⁰, the Committee considered that any future developments within the buffer zone of the property need to be guided through strategic planning, which can be achieved by strengthening the MP through the procedures for SEA and requested the State Party:
 - to ensure that the draft new MP is revised to comply with the requirements set out by the MOEW and is evaluated through the procedures for SEAs,
 - to submit the MP and the results of its evaluation through the procedures for SEA and AAs to the World Heritage Centre, for review by IUCN,
 - to provide the World Heritage Centre information on other ongoing processes, that might affect the OUV of the property,
 - not to approve any further developments within the property or its buffer zone until the draft new MP has been subject to the procedures for SEA and EIA.

The decisions here above have been partly implemented by the State Party to date; all of them are still valid and should find an adequate response from the State Party through the process of elaboration of a new management plan

2.3 The management of national parks in Bulgaria

According to the Protected Areas Act in Bulgaria (1998, amended in 2012), the MP of a national park should be prepared in close cooperation with all interested stakeholders, through consultations and discussions; it should consist of four main parts¹¹:

- part 1: description and assessment base on field studies and existing reliable documentation;
- part 2: long-term and operational goals;
- part 3: zoning and regimes of uses and activities;
- part 4: operational tasks and recommendations.

According to the Law, the MP of any specific protected areas remains valid and active, until the next one is developed and enters in force; therefore, the 2004 PNP MP will continue to be valid and implemented until a new MP is adopted.

The overall preparation process of a MP is under the umbrella of the MOEW, and locally, the NP Directorate (NPD); the NPD is also in charge of implementing the MP by means of annual sectoral plans detailing the operational regime for each use and/or activity, amongst others: forest maintenance and restoration, grazing and mowing, collect of herbs, plants, fruits and mushrooms. The NPD is also in charge of the annual monitoring of the area.

Furthermore, the art. 21 of this Act, forbids the following uses and activities¹²:

- *“any new construction, except tourist shelters and huts, water catchments for drinking water, purification installations, buildings and installations for the needs of the management of the park and services for the visitors, underground communications, renovation of existing buildings, roads, sport and other infrastructures;*
- *industrial activities with exception of maintenance and restoration activities in the forests, lands and waters areas;*
- *clear felling;*
- *use of artificial fertilisers and other chemical substances;*

¹⁰ Decision: 40 COM 7B.93.

¹¹ See also the Ordinance for drafting plans for the management of protected territories, 13/15 Feb 2000.

¹² From the English version of the Act provided by the State Party.

- *introduction of vegetal and animal not typical from the region;*
- *grazing of goats and in forests, outside the meadows and pastures;*
- *collect of herbs, wild fruits and other plants and animals, except at defined places;*
- *collect of fossils and minerals, damages to rock formations;*
- *damages to the natural features of watersheds, streams, as well as to their banks and adjacent areas;*
- *game breeding and hunting, except for regulating the number of animal;*
- *sport fishing and fish breeding, except at defined places;*
- *pollution of waters, from domestic, industrial uses and from any other sources;*
- *camping and fire outside the defined areas;*
- *intervention in the biological variety;*
- *collect of rare, endemic, relict and protected species, except for scientific purposes;*
- *any other activities determined by the order for the creation of the Protected Areas and by its the management plan”.*

In the English version of the Act provided to the mission, several of the above provisions may create misunderstanding; for example, the construction of “*buildings and installations for the needs of the management of the park and services for the visitors*” may be allowed in the property, and the general ban of “*clear felling*” does not seem to include other types of logging activities which may be interpreted as not strictly forbidden.

In the worst-case scenario, one could imagine that this wording does allow for an interpretation incompatible with the obligation of the State Party to maintain the OUV of the property and preserve its integrity. Such an interpretation would, however, be unacceptable from the point of view of the State Party's international commitments and the decisions of the Committee and would represent sufficient threat under the Convention and the OGs (§ 180, d) to 191) to justify the possible inscription of the property on the List of World Heritage in Danger.

Furthermore, the MOEW has interpreted those provisions as follows¹³:

“According to Art. 21, item 2 of Protected Areas Act - the specialized legislation for Protected Areas, in the national parks in Bulgaria, including PNP, manufacturing activities, including timber industry are prohibited.

By exception, only maintenance and restoration activities in the forests, lands and water areas, are allowed.

In this regard, the activities in the forests of the national parks are not related to commercial logging, but to maintenance, restoration and improvement of their condition, by removing of diseased and injured individual and groups of trees.

The purpose of the maintenance and restoration activities in the forests is to prevent diseases and calamity attacks by insect pests. All type of activities in the forests in the national parks foresee a sanitary minimum of dead wood, amounting to 10 cubic meters per 1 ha and required for the normal functioning of ecosystems, to be left at the place. Up to now maintenance and restoration activities have been conducted only in about 5% of the forests within the national park. ...”.

The provision on the construction of new buildings and infrastructures for “*the needs of service for the visitors*”, may also be interpreted in a way that summer or winter mass tourism facilities and accommodations might be allowed in the future, within the property;

¹³ Letter from the MOEW

according to the draft new MP, the new "Tourism zone" would also be larger than the current zone, and would extend beyond the limits of the new "special buffer zone" proposed in the draft new MP (see below).

The MOEW's letter mentioned above also reduces significantly this ambiguity, at least on the administration point of view:

"The identification of a bigger Tourism zone does not mean that within this zone can be carried out activities related to ski development or other activities with similar impact. In the new territories proposed as Tourism zone cannot be provided activities related to ski development or other activities with similar impact according to Decision 36 COM 7B.18 of the World Heritage Committee. The WHC decision which prohibits ski development in the Property or outside the ski areas, is explicitly mentioned in the functional description of the Tourism Zone (in the new draft new MP) as well as in the specific regime of this zone. Besides in the specific regimes of the Tourism zone the draft of the new management plan introduces common regimes valid for the entire territory of the Park, according to which skiing and other activities with a similar impact are not allowed in the Property outside the buffer zones.

According to the draft new MP ski development is allowed only in the buffer zone of the World Heritage Property, which is a "Special buffer zone" according to the draft of the new MP of the Pirin NP".

To summarize, whilst MOEW provides the above reassurances, if future construction of buildings and recreational facilities as well as forest management is not in line with this expressed position of MOEW, such activities would potentially threaten the property's OUV and/or affect significantly its integrity which might constitute a case for its inscription of the property on the List of WH in Danger, according to the Committee's permanent position (§ 2.2).

Therefore, it is strongly advised to be specific within the management plan itself, the possible exact location and characteristics of all buildings and recreational facilities that could be built in the future in the WH property, in order to avoid all misunderstandings and difficulties and remove all current ambiguities from the document.

2.4 Overview of main changes proposed in the new draft MP

The current PNP MP was adopted in 2004 for 10 years; hence, it should be updated.

2-4-1 The zoning

The main modifications to the zoning introduced by the draft new MP would be the following (**Tables 1 and 2**):

- a slight extension of the strict reserve zone (+ 529 ha);
- a decrease of the zone of limited human impact (- 1065 ha);
- a decrease of the zone of conservation and sustainable use of forest, meadows, lakes, water and other ecosystems (- 1349 ha);
- an important increase of the tourism zone, with the establishment of a "special buffer zone" (+ 1913,9 ha);
- a slight reduction of the zone of buildings and facilities (- 19 ha).

Zone	Name of the zone	Area (ha)	% of the territory
Ia	Reserve (strict)	5991,8	14,8
Ib	Zone of restrictive human activities	8198,5	20,3
IIa	Zone of conservation of forest, high mountain grasslands, lakes and river ecosystems	18245,0	45,2
IIb	Zone of sustainable use of opened area and recreation	6806,8	16,9

III	Tourism zone	895,1	2,2
IV	Zone of buildings and park/sport facilities	218,8	0,6
Total		40356,0	100,0

Table 1 – Zoning of the current PNP MP (Source: adapted from MOEW).

Zone	Name of the zone	Area (ha)	% of the territory
I	Reserve (strict)	6521,7 ¹	16,1
II	Zone of restricted human activities	7133,3	17,7
III	Zone of conservation of forest, high mountain grasslands, lakes and river ecosystems	23702,1	58,7
IV	Tourism zone	2809,5 ²	7,0
IV-A	Sub-zone " <i>Special buffer zone</i> " (Bansko and Dobrinishte resorts) – including a <i>Separate part "Ski Buildings and Facilities"</i> with ski runs, tracks, lifts, buildings and facilities (1078,2 ha total surface: 189,5 ha/construction + 16.2 ha/routes and 872.5 ha/forest)	1078,2 ³	-
V	Zone of buildings and park/sport facilities	199,3	0,5
Total		40365,9	100,0

Table 2 - Zoning of the draft new PNP MP (Source: MOEW).

¹ including the extension of Bayuvi dupki-Dzhindzhiritsa strict forest reserve (+ 544,5 ha).

² including extension of this zone (1 937 ha: 1619,8 ha + 317,2 ha, subtracted from other zones).

³This zone (1078,2 ha) would contain areas from current zone IV (888,7 ha: 872,5 ha + 16,2 ha) and V (189,5 ha), located in the buffer zone of the WH property.

2.4.2 The land use regimes

A brief comparative analysis of the various regimes per category of use, leads to the main following conclusions, having in mind the Protected Areas Act (art. 21), as well as the interpretation of this article by the MOEW administration, as noted above (§ 2.3):

- the regime of the strict protected zone will remain the same as to date;
- construction of sport and recreational infrastructures and facilities may be allowed in both the Tourism zone and the zone designated for the conservation of forest, high-mountains grasslands, lakes and river ecosystems. This possibility may be seen as rather permissive and potentially leading to excessive developments of constructions in sensitive zones of the PNP, in the future;
- logging would be possible as a "*maintenance and restoration*" measure only, both in the zone of limited human activities and the one assigned to the conservation of forest, high-mountains grasslands, lakes and river ecosystems. The wording of the text may be seen as opening also the door to potential selling of timber for local uses bearing in mind that commercial logging is forbidden by the Law - and leading theoretically to timber extraction detrimental to the maintenance of the OUV of the property or affecting its integrity. Therefore, any timber extraction activities will need to be strictly regulated to be fully compatible with the obligation of preserving the natural ecological processes in line with the criterion (ix) of the WH Convention. In any case, the decision of cutting/removing logs would be based on annual plans elaborated by the PNP Directorate, after consultation of the PNP Scientific Committee and they should be submitted, when necessary, to any other relevant institutions, such as the Academy of Sciences of Bulgaria;
- in addition to the significant expansion of the zone for grazing, the pressure from this activity might increase significantly in the property. It is not clear whether this increase is motivated by the necessity to preserve the high mountain grassland ecosystems and their ecological functions or led by socio-economic reasons; this new regime of grazing should be better motivated in the draft document and any extension of the grazing zone proposed only if linked to the need to maintain the OUV of the property;
- new water catchment facilities could be built in the property but, according to the Law, only for "*drinking water*" for the needs of the "*management the park and services for the visitors*"; to avoid the difficulties met in the past regarding the

construction and management of water catchments, priority should be given to the optimization and improvement of the existing water facilities; in any case, the necessary environmental impact assessments should be carried out which - according to certain local stakeholders - have not always been respected in the past.

3 ASSESSMENTS

3.1 The revision of the current plan

3.1.1 General comments

The amendments to the current MP were adopted by the MOEW in late December 2017¹⁴, apparently as a response to the NGOs' legal action against the draft new MP which prevented the adoption of the new plan due to the ongoing Court case.

The purpose of the revision of the current MP was to unblock the situation created by this legal action and thus enable tourism infrastructure development to be started without further delay in the PNP.

According to this decision, it would be possible to build recreational equipment, facilities and related infrastructures in the buffer zone of the property; each relevant programme/project/activity planned would be subject to strategic and other appropriate EIAs, according to the national law.

The mission highlighted several times during its visit the necessity to have a comprehensive and long-term vision of the development of the socioeconomic activities in the existing buffer zone. The Committee also requested on several occasions to prepare detailed "Tourism Implementation Plans" for the Bansko and Dobrinishte buffer zones, in order to consolidate existing, approved and envisaged plans in a transparent manner, and in its most recent Decision the Committee noted "that any future developments within the buffer zone of the property need to be guided through strategic planning"¹⁵.

Rec. 1 - Whether currently possible or not from a legal point of view, it is recommended not to implement the introduced amendments to the current management plan adopted by MOEW, until there is clear and comprehensive long-term vision of the socio-economic development in the buffer zone of the property that would be in line with the goal of long-term protection of the OUV of the property; this vision should provide a strategic framework for this development, as well as general orientations and zoning.

The next PNP MP should detail further the approach to how the protection and management of the property will relate to development and show how any proposed development would protect and/or enhance the OUV of the property and contribute to maintaining its integrity, according to the OGs (OGs., § 104). The assessments of any of the programmes/projects/activities planned in the buffer zone, should address all potential, direct and indirect and cumulative effects on the OUV of the property and its integrity; this should concern new equipment, infrastructures and facilities, as well as the maintenance and extension of the existing ones.

3.1.2 Specific comments

During the expert's visit, the construction of a second lift in the Bansko resort was discussed on several occasions; this lift would be entirely located in the existing buffer

¹⁴ Decision n°821 dated 29 December 2017.

¹⁵ Decision 40COM 7B.93

zone of the property, between Bansko and Shiligarnika, to optimize the existing ski capacities and reduce the effects of the car traffic detrimental to the environment (noise, pollution etc.).

This equipment could be allowed under the December decision of the MOEW to amend the current MP; it would have a capacity of maximum of 3000 visitors/hour and no new slope – neither extension of existing ones – would be allowed.

Rec. 2 - Should this current “*expression of will*” become a project in the future, it should be designed as contributing to strengthening the preservation of the property and be compensated by measures such as the closure of the existing access road to Shiligarnika, except for public purposes (security, safety etc.) and the development of electric car shuttles in the Bansko resort.

The State Party should also inform the Committee of its intention to undertake or to authorize this project and any other, prior its/their final adoption, according to OGs, § 172 to 174.

This project should also be subject to the necessary SEAs and EIAs, according to the national law.

A specific chapter should be devoted in the assessment reports to all potential direct and indirect effects of this new facility on the OUV and integrity of the property; those reports should be submitted to the Committee for comments, prior to any decision from the State Party.

3.2 The draft new management plan

3.2.1 General comment

The new MP should ensure that the OUV of the property – including the condition of integrity – is sustained or enhanced over time (OGs, § 96 to 118).

Furthermore, this MP should specify how the OUV of the property is preserved and how its effective protection, for the present time and for the future¹⁶, will be ensured; the plan may incorporate traditional practices and, in all cases, EIAs for proposed interventions will be essential.

It is clearly stipulated in the draft document that the MP aims to become a tool for the management of the property for 10 years, the first key objective being the conservation of the PNP as a World Heritage site and the three others dedicated to:

- the conservation of the representative species and natural habitats of European and national interests;
- the conservation of the natural character of the ecosystems;
- the improvement of the visitor management.

Those objectives are fully compatible with the WH Convention requirements.

However, the document does not include a specific section on the preservation of the OUV of the property and justifying how these objectives will be achieved by reference to the obligation of the State Party to maintain the integrity of the property and to preserve the

¹⁶ See also UNESCO/ICCROM/ICOMOS/IUCN, 2012 – Managing World Natural Heritage. World heritage Resource manual, 98 p.
(https://www.google.fr/search?q=Managing+World+Natural+Heritage.+World+heritage+Resource+manual%2C+98+p&ie=utf-8&oe=utf-8&client=firefox-b-ab&gfe_rd=cr&dcr=0&ei=--2rWp7PGNLHXv_gnsqP).

characteristics that have motivated its designation under each criterion (vii), (viii) and (ix).

Furthermore, the provisions referring to the WH Convention in the preamble of the document – including those detailed in § 0.1 “*Grounds on development of the management plan*” (p 1 to 4) - as well as the several allusions to the site appearing later in the text, remain often basic and general; they do not provide a logical framework detailing how the management priorities and targets will help to maintain the OUV of the property and its integrity, from landscape and ecological perspectives.

Moreover, the proposed measures, whether they concern the new zoning of the PNP or the regimes of use in the various zones, may be seen or interpreted by some stakeholders, more as a potential threat on the property’ integrity than as a contribution to strengthening its OUV.

Rec. 3 - A specific section should be added to the draft new MP document, describing the OUV of the property, and specifying the main characteristics on the basis of which the property was listed; this section should explain how the management options/targets - zoning and regimes of uses within the PNP - may contribute to protecting the OUV of the property and maintaining its integrity, i.e. its wholeness, intactness, and the absence of threats (OGs, § 87 to 95), including potential threats (OGs, § 179, b).

The absence of potential threats should be assessed for each of the main uses and activities that may have potentially harmful effects on the OUV of the property and on its integrity.

3.2.2 Specific comments

The following comments relate to the preparation process of the draft new MP and its content.

3.2.2.1 *The preparation process*

The draft document describes (p.5 to 8) the consultation process that was followed during the preparation phase as well as the main steps that marked it.

This process had involved a number of stakeholders, in several meetings and events; according to the project consultant¹⁷, the public was involved in the development of the MP through the following events:

- a public meeting was organized to launch the process;
- a total of 8 briefings were held in the 7 municipalities;
- 6 two-day meetings/seminars were organized with representatives of the Public consultative council, at the PNP Directorate; various stakeholders were invited to join the discussions and make proposals;
- “Open days” were also organized in the 7 municipalities to present the final draft of the MP and to open a public the discussion on the draft new MP;
- the draft document was also published on the PNP web site¹⁸.

However, several NGOs’ representatives met during the mission complained repeatedly that they were not sufficiently involved in this preparation process and that their proposals were not heard or listened to; several of them protested about the ecological assessment and the priorities and management targets proposed in the draft document. The main

¹⁷ Proles Engineering (cf. meeting on 7 March, power point presentation).

¹⁸ www - www.pu-pirin.com.

disputes concerned the zoning as well as the regime of certain uses and socio-economic activities.

These protests were echoed in the near past, by a series of street demonstrations questioning the political vision of the government for the future of the PNP (**Picture 1**).



Picture 1 – Sofia, January 2018, protest of the civil society against the new draft new MP and the decision of the MOEW amending the current MP (Source: Google).

Thus, the mission thinks that a significant part of the problems encountered to date by the State Party stems from a difficult dialogue between the stakeholders, exceeding the scope of the present external assessment which was focused on the review of the draft new MP and on the modification of the current management plan adopted in December 2017.

Rec. 4 - It is recommended:

- to seek the opinion of the Bulgarian Academy of Sciences on (1) the preliminary diagnosis made by the consultant responsible for the preparation of the draft new MP and (2) its content with regard to the zoning, as well as the regime and the pressure of the main uses and activities that would be developed in the property and its buffer zone in the future;
- to establish a process of mediation with the NGOs and other stakeholders who are concerned by the draft new MP in order to address and solve the highest-priority technical issues currently debated; IUCN and the World Heritage Centre may be invited to facilitate such process.

3.2.2.2 The content of the draft new MP

During its visit, the mission collected comments mainly on four types of uses and activities: grazing, forest and water resource management, tourism and related construction activities.

Four notes are made at this stage of the analysis:

- according to the WH Convention and the OGs, none of those uses and activities is strictly forbidden in a World Heritage property, but they all should be developed in a sustainable way and not create a potential danger for the property; the existence of such danger can only be evaluated case by case, according to the intensity of each relevant programme/project and activity;
- any use and activity that may have significant harmful direct or indirect impacts on the OUV of the property or affect its integrity, including its ecological functionalities, may lead to its inscription on the List of World Heritage in Danger (OGs, § 180 to 182);

- the provisions of the draft new MP should be read and interpreted in the light of the national legislation of the State Party, such as the Protected Areas Act, the Environmental Protection Act and the Biological Diversity Act;
- the Committee has considered that any future development within the buffer zone of the property needed to be guided through planning effort which can be achieved by strengthening the MP through the procedures of a strategic approach¹⁹; it has also urged the State Party not to approve any further developments within the property or its buffer zone until the draft new MP is adopted (see **Rec.: 1** here above);

The following comments complete those made above.

3.2.2.2.1 Grazing

Grazing may contribute to the maintenance of opened areas within the park and preserve the natural habitats for biodiversity.

However, if grazing is to be compatible with protection of the OUV of a property, this activity should be carried out in a sustainable manner, as noted above, and also be compatible with the main characteristics of the property, in this case, under criteria (vii), (viii) and (ix) (OGs, articles 90 to 94).

The grazing regulation in the new draft Management Plan seems to be more sophisticated than the current one and, in some ways, more comprehensive and adapted to the various ecological conditions and altitudes; for example, the number of animals allowed for grazing would be determined according to the age of cattle and to two classes of altitude, they would also be determined according to the grass availability and always upon the decision of the PNP administration.

This activity would be allowed only in meadows and pastures and strictly forbidden in forest habitats. There would be also a new grazing rate for horses, that does not exist in the current MP.

However:

- the draft new MP substantially expands the area of land allocated to this activity (**Maps 3 and 4**);
- based on the figures and data provided to the mission, the grazing pressure might also increase notably for cattle (eg: from 0,5 head/ha to 1 head/ha) and decrease for sheep (from 2,5 sheep/ha currently to 1,25 sheep/ha in the draft new MP);
- as discussed during the mission's visit, the pollution of mountain lakes and other water systems coming from this activity, has become a concern.

Rec. 5 - The new grazing regime planned in the new draft MP should be reevaluated in order to be clearly link to the goal of the preservation of the main values of the property; its implementation should also be based on a very detailed field analysis of the ecological context and strictly limited to the carrying capacities of the relevant ecosystems.

The organic pollution from grazing should also be addressed properly in the draft new MP so as to minimize the level of risk and ensure the preservation of integrity of the water ecosystems.

3.2.2.2.2 Forest management

¹⁹ Dec. 40 COM 7B.93.

Forest management activities may be acceptable in the property, provided that they do not affect adversely its OUV (OGs, § 94 and 95); those activities should also be carried out in a sustainable manner, in full compatibility with the key characteristics of the property and its environmental sensitivity.

During the expert's visit, several stakeholders expressed concerns on the new zoning (**Maps 5 and 6**) and forest management regime stipulated in the draft new MP; they may come partly from misunderstandings and different interpretations of the draft document; for example, the "*maintenance and restoration*" works that could be allowed in the property may lead to excessive timber extraction.

According to the Protected Areas Act, commercial forest activities are forbidden in national parks and only forest activities with the sole purpose to prevent and manage fire, diseases and pests²⁰ may be allowed; those maintenance and restoration work and activities should not be permitted if they would undermine the OUV of the property or degrade its wholeness and intactness. Moreover, forest activities, whatever they are, would be strictly forbidden in the strict reserves and in the ancient forests, which are more than 200 years old²¹.

Furthermore, and to date, based on information provided by the PNP Administration, the forest maintenance and restoration activities in the PNP have been conducted on 5% of the forested territory²² and the wood produced as a by-product of those operations has been provided to the local communities for a symbolic price or used for repairing works on existing infrastructures and facilities.

²⁰ Protected Areas Act, art. 21.

²¹ See Draft new MP, § III – Specific regimes by zone and sub-zone, 6.).

²² Source: MOEW.

Rec. 6 - No forest management activities should be permitted if they would negatively impact on the natural processes which have justified the inscription of the property under criterion (ix); forest management should be limited to tree cutting and removal of dead wood, only for safety reasons, along the immediate vicinity of roads/trails crossing the property and in the vicinity of the existing cabins and chalets.

Interventions against pests and diseases should also be minimized; they should be decided after obtaining the opinion of scientists, having in mind that they may be part of the ecological processes on the basis of which the PNP was listed under criterion (ix) and that dead wood plays a key role in the preservation of natural habitats for many endangered and threatened species that contributes in building the property's value even though the property was not listed under criterion (x).

Timber extraction should be strictly limited to not impact on the preservation of the main features of the property; it should affect neither the conditions of its integrity, nor the key aspects of the ecological processes that are essential for the long-term conservation of the ecosystems and the biological diversity they contain.

The exact location and volumes of any timber extraction should be defined on a yearly basis, upon the proposal of the PNP Administration and after consultation with the Scientific Committee; those location and volumes should be based on the necessity to maintain the OUV and in the strict limits of the natural capacities of the property, only if justified as necessary maintenance measures and in the limits fixed by the Protected Areas Act.

The draft new MP should stipulate clearly that the timber produced from any such legitimate conservation activities can be provided to the local communities, within the limits of the long-term preservation of the property and should not, in any way, be the object of commercial trade.

3.2.2.2.3 Water resource management

Water resource management was also a matter of concern in the past and, according to certain stakeholders, the national regulation had not been always strictly respected.

As defined in the draft new MP, the regime of use of water resource may be seen as rather permissive; it seems that water catchments might be allowed in the within most of the territory of the property, except in the strict nature reserves; however, according to the Protected Areas Act, only water catchments for "*drinking uses*" and "*buildings and installations for the needs of the management of the park and services for the visitors*" can be allowed in a national park; any other use such as for producing artificial snow, is strictly forbidden.

Moreover, the "*services for visitors*" should also be interpreted strictly and as just the supply of drinking water for the park's visitors.

This provision should also be interpreted as a possibility to use water resources in the limits of the property's capacities and without affecting its OUV and natural functionalities.

Finally, water extraction within the property should always be subject to the necessary SEAs or EIAs.

Rec. 7 – It should be specified in the draft text of the new Management Plan that any new water catchment may be allowed in the property only for drinking water purpose, as specified in the law, and in the limits of the natural capacities of the property; such catchments should never have significant effects on the natural processes within the property and the ecological functioning of its water ecosystems should always be fully preserved.

Priority should also always be given to optimizing and improving the existing water facilities and to seeking alternative source of water outside and downstream the property.

3.2.2.2.4 Tourism

When sustainable, tourism may be an excellent tool for developing local economy and improving the well-being of the residents; however, the recreational activities may also sometimes put excessive pressure on environment and natural resources, especially in areas which are ecologically sensitive.

Looking at the different plans, decisions and other sources of information, the territorial approach of tourism development in the PNP shows a significant evolution; limited to a part of the buffer zone in the current MP (**Map 7**), tourism might be expanded if the amendments to the current MP introduced by the December decision of MOEW were implemented (**Map 8**) and significantly developed in several other areas of the property according to the draft new MP (**Map 9**).

Based on *online* documentation, various programmes of development of mass tourism were prepared in the near past for the Pirin region; most of these programmes are in contradiction with the current PNP MP and could have important harmful effects on the property, should they be fully or only partly implemented.

As shown on **Map 10**, they would directly affect the property and be incompatible with the State Party international commitments and the Committee decisions as they would potentially provide for expansion of tourism facilities outside the current buffer zone.

From other sources - and subject to confirmation from the State Party - ski development plans would be also planned in the Bansko vicinity, within the property (**Map 11**).

All those plans are situated in areas covered by the "Tourism zone" of the draft new MP.

This coincidence between the existence of mass tourism development plans within the property and the definition of new tourism areas in the draft new MP should not be interpreted as a will to target the socioeconomic development of the region on tourism within the property that would not be sustainable.

Such development would immediately threaten the property; it would also be in total contradiction with the Committee decisions and lead immediately to the recognition of potential or ascertained danger that may motivate a decision of inscribing the property on the List of World Heritage in danger (OGs, § 180).

Furthermore, the Committee called for detailed "Tourism Implementation Plans" for the *Bansko and Dobrinishte buffer zones, consolidating existing, approved and envisaged plans in a transparent manner, and ensure that these buffer zone areas are explicit parts of the new Management Plan*" and "considered that any future developments within the buffer zone of the property need to be guided through strategic planning"²³.

²³ See ref. supra.

During its visit, the mission highlighted on several occasions this expectation. However, the expert was not able to obtain neither from the State Party, nor from the Bansko ski resort operator, precise information on the existence of such a strategic approach.

This can be questioned in the light of the detailed maps and other information available *online*.

Rec. 8 - The State Party's vision on the development of tourism in the property and its surroundings should be clarified.

This vision should seek to develop viable alternatives to ski-based tourism development, according to previous Committee decisions; it should be detailed properly in the draft new MP and made fully compatible with the legal obligations of the State Party under the WH Convention, to preserve the OUV of the property and maintain its integrity.

The diagnostic made in the draft new MP leads to prioritize the renovation of the existing recreational facilities and to promote green tourism; this should be reflected more clearly and in further details in the draft text.

Rec. 9 - Priority should be given in the draft new MP to the optimization and renovation of the existing recreational facilities in the property and further details should be provided on the infrastructures and accommodation in general, to be improved; a more comprehensive framework should be detailed in the draft document.

3.2.2.3 *Other issues*

A few other issues were discussed during the expert's visit.

3.2.2.3.1 The consistency between all land use and management plans and programmes

Based on discussions during the visit, different plans and programmes related to the property and its surroundings seem not be fully consistent (eg.: PNP management plan, Territorial Arrangement Plan (TAP), municipalities land uses plans, Uhlen concession act).

Furthermore, the sentence "*Tourist sites and facilities are in the context of the actual spatial plans of municipalities in the NP region with their tourist and socioeconomic development*"²⁴ is ambiguous.

Rec. 10 - This wording quoted in the above paragraph should be adapted – or preferably removed from the draft text - having in mind that, in line with the OGs (OGs, § 97), the development of the municipalities should be made fully compatible with the PNP MP.

All inconsistencies between land use and management plans and programmes, whether public or private - at national, regional and municipal levels, should be corrected by administrative and legislative adequate measures to avoid any confusion on the limits of the PNP and its buffer zone, as well as on the regimes of land uses and socio-economic activities.

3.2.2.3.2 The governance of the PNP

The functional governance of the PNP is clear; however, it did not work perfectly in the past.

²⁴Draft new MP, § 3.1.4.

There is a need to clarify the role of each body and improve drastically the functioning of the Scientific Committee which should play a key role in the implementation of the draft new MP, especially with regard to the operational decisions on forest management activities and grazing in the property; this committee did not meet on regular basis in the past and this is not acceptable for a high standard protected area.

Rec. 11 - The composition and terms of reference of the Scientific Committee should be reviewed.

This committee should be much more involved in the management of the property than it has been in the past; it should involve high level scientists and specialists in the fields of functional ecology and natural resource management and meet regularly, as often as needed, at least two or three times a year. This should be specified in the draft new MP.

CONCLUSION

The difficulties encountered by the State Party relate partly to the scope of the PNP management priorities and targets stipulated in the new draft MP, which reveal a significant gap between the political vision of the State Party and the expectations of a significant part of civil society.

Thus, the implementation of several recommendations of this report can only be the result of a major effort of dialogue between these various actors, in the nearest future; they also call for a strong political will of the State Party to respect and fully implement the World Heritage Committee's decisions.

The present situation could - hopefully - be eased by an external mediation, aiming to combine the necessity to maintain the OUV of the property, with actions that meet the legitimate common wish to foster a sustainable development in this region.

In summary and beyond the specific recommendations made above in this report, the mission recommends the State Party:

- not to implement the December decision of MOEW which introduced amendments to the current MP until the Court has taken its decision regarding the new draft MP;
- to reconsider the new draft MP, in the light of the present assessment and all specific recommendations proposed here above by the Mission, and with the principle that the new MP must assure the protection of the OUV of the property (this should be done also in the light of the future decision of the Court);
- to engage in mediation with the NGOs and other stakeholders that are concerned by the draft new MP and its implementation;
- to inform the World Heritage Centre and IUCN of any development project in the current buffer zone, prior to its final adoption, and provide the Centre and IUCN with the appropriate SEAs and EIAs, in line with the procedures set out in the Operational Guidelines.

LIST of ANNEXES

Annex 1 - Terms of Reference

Annex 2 - Programme

Annex 3 - List of participants to the meetings

Annex 4 – Decision of the MoE amending the current MP (English version)

Annex 5 – Draft new MP (English version)

Annexes 6 to 16 - Maps

**IUCN Advisory Mission
to the World Heritage WH property “PNP”**

5-9 March 2018.

Terms of reference

Further to **Decision 40 COM 7B.93** of the World Heritage Committee, the State Party of Bulgaria has requested an Advisory mission to the World Heritage property “Pirin National Park”. This request was made by the State Party in a letter to the World Heritage Centre, dated 28 September 2017 with further details provided in a second letter dated 17 November 2017.

The main objective of the Advisory mission was specified in **Decision 40 COM 7B.93** as “to review the implementation of the Management Plan and the preservation of the OUV of the property”. However, in its letter, the State Party clarified that a Decision by the Minister of Environment and Water (MOEW), that no Strategic Environmental Assessment (SEA) was required for the draft Management Plan, had been appealed in the court. Given that the court case is still in progress, it was not yet possible for the MOEW to finalize and adopt the Management Plan. Therefore, the State Party has specified in its letter that the purpose of the Advisory mission would be to review the revised draft Management Plan for “Pirin National Park”. The mission will be conducted by Mr Hervé Lethier, representing IUCN.

In particular, the mission should undertake the following:

1. Review the draft revised Management Plan for “Pirin National Park”, particularly in relation to the preservation of the Outstanding Universal Value of the property;
2. Hold consultations with all relevant stakeholders, including representatives of the MOEW, Directorate of Pirin National Park, representatives of NGOs and municipalities;

The State Party will facilitate necessary field visits to key locations and provide all relevant documents and materials in appropriate format and in English or French, particularly the draft Management Plan for Pirin National Park, to the World Heritage Centre and IUCN as soon as possible and preferably no later than one month prior to the mission.

Based on the results of the above-mentioned reviews, assessments and discussions with the State Party representatives, authorities and other stakeholders, the mission will prepare a concise report on the findings and recommendations for the State Party within six weeks following the site visit. It should be noted that recommendations will be provided within the mission report and not during the mission implementation.

PROGRAMME OF THE ADVISORY MISSION

6-9 March 2018

6/03

Travel Geneva/Sofia
Arrival late afternoon

7/03

- Meeting with representatives of non-governmental organizations representing the Coalition "Keep the nature in Bulgaria", including the Bulgarian Biodiversity Foundation, WWF, the Association of Nature Parks in Bulgaria and others;
- Meeting with representatives of non-governmental organizations - NGO "Coalition "Nature for People and Regions" and others;
- Travel Sofia/Bansko;
- Accommodation in hotel;
- Dinner - with representatives of the MEOW and the Secretary General of the National Commission for UNESCO/Ministry of Foreign affairs and Mayor of Bansko

08/03

- Visit of the PNP Directorate
- Discussion on the new management plan with representatives of the MOEW, the Directorate of PNP and Proles Engineering Ltd (performer of the Management plan).
- Lunch
- Discussion of the new management plan (continuation)
- Dinner

09/03

- Visit to PNP and the buffer zone World Heritage Property - Bansko Ski Zone
- Meeting with Uhlen company (Bansko ski resort operator)
- Lunch
- Meeting with the Vice Prime Minister, the Minister of Environment and water and representatives the of the local municipalities
- Dinner

10/03

- Departure to Sofia
- Departure to Geneva

List of participants to the meetings

6 March 10.00-12.00	
Participant	Organisation
Mrs. Katerina Rakovska	WWF - Bulgaria
Mr Dobri Dobrinov	
Mr Stoycho Stoychev	Bulgarian Society for the Protection of Birds
Mr Petko Tsvetkov	
Mr Toma Belev, President	Association of Parks, Bulgaria
Mrs. Nelly Doncheva	
Mrs. Zornitsa Stratieva	
Mr Lachezar Pehlivanov	Institute of Biodiversity and Ecosystem Research of the Bulgarian, Academy of Sciences
Mrs. Anna Ganeva, Director	
Mr Tsvetanov Zlatanov	
Mr Chavdar Gusev	
Mr Rosen Tsonev	
Mrs. Lyudmila Dimitrova, Manager	
Mr Miroslav Kalugerov, Director	National Nature Protection service Directorate, MOEW
Mr Borislav Bechev, State expert	Natura 2000 and Protected Areas department, National Nature Protection service Directorate, MOEW
Mrs. Tsvetelina Ivanova – State expert	
Mrs. Stella Todorova – Chief	

6 March 2018 – 13.30-15.30	
Participant	Organisation
Ms. Polly Karastoyanova, Deputy Chair	Board of Directors of the National Board of Tourism
Mr Slaveiko Staykov, Executive Director	Rila Sport corporation
Mrs. Vanya Bijzeva	Balkan Center for Sustainability and Environmental Engineering
Mr Dimitar Ruskov, Chairman	Association "Future for Bansko Municipality"
Mr Evgeni Popov	Control Council of the National Association for the Development of Mountain Municipalities in the Republic of Bulgaria.
Mr Malin Bistrin, Advisor of the Minister	Ministry of tourism
Mr Stilian Geraskov	National Hunting Association - Union of Hunters and Fishermen in Bulgaria
Mr Miroslav Kalugerov, Director	National Nature Protection service Directorate, MOEW
Mr Borislav Bechev, State expert	
Mrs. Tsvetelina Ivanova, State expert	

7 March 2018 – full day	
Mrs. Dimitrina Berberova, landscape architect	Proles Engineering
Mr Ilija Petrov, engineer	
Mr Plamen Dorosiev, engineer	
Prop. Rositsa Petrova, Forestry University	
Prop. Rositsa Petrova, Forestry Technical University	

Prop. doctor Alexander Tashev, Forestry Technical University	
Prop. Dimitar Pavlov, Key expert in natural habitats and forests	
Prop. doctor Ekaterina Pavlova, Key expert in monitoring and effective management	
Mr Rosen Babenski, Director	PNP Directorate
Mr Strahil Hristov, Deputy Director	
Mr Martin Lazarov, Deputy Director	
Mrs. Ina Sarbakova, expert	
Mrs. Elena Topuzova, expert	
Mrs. Nadka Galabova, expert	
Mr Petar Petrov, expert	
Mrs. Ioanna Dundova, expert	
Mrs Nikolina Angelinina, expert	
Miroslav Shumarov, expert	
Mrs Raja Iambreva, expert	
Mr Miroslav Kalugerov, Director	National Nature Protection service Directorate, MOEW
Mr Borislav Bechev, State expert	
Mrs. Tsvetelina Ivanova, State expert	
Mihail Mihaylov, external expert and former director of National Nature Protection service Directorate	

8 March 2018 – lunch time	
Mr Ivan Hadjiev, Chief of the lifts (Bansko ski zone)	Uhlen Company
Mrs. Maja Hristoskova, Director	
Mr Petar Petrov, lawyer (attorney) and executive Director	
Mr Ivan Obreykov	
Mr Georgi Ikonov, Mayor	Bansko municipality
Mr Miroslav Kalugerov, Director	National Nature Protection service Directorate, MOEW
Mr Rosen Babenski, Director	PNP Directorate
Mr Mihail Mihaylov, external expert and former director of National Nature Protection service Directorate	

8 March 2018 – 15.30-17.00	
Mr Valeri Simeonov, Vice Prime Minister on economic and demographic policy	
Mr Neno Dimov, Minister of environment and water	
Mrs. Iskra Andreeva, General Secretary	Unesco National Commission, Ministry of foreign affairs.
Mr Georgi Ikonov, Mayor	Bansko municipality
Mr Krasimir Gerchev, Mayor	Razlog municipality
Mr Vangel Antalavichev, vice Mayor	Sandanski municipality
Mr Dimitar Zahariev, Architect, representative	Simitly municipality
Mr Dimitar Ialakov, representative	Goce Delchev municipality

Mr Miroslav Kalugerov, Director	National Nature Protection service Directorate, MOEW
Mr Borislav Bechev, State expert	
Mrs. Tsvetelina Ivanova, State expert	
Mr Mihail Mihaylov, external expert and former director of National Nature Protection service Directorate	
Mr Rosen Babenski, Director	PNP Directorate

Decision of the MoE amending the current MP (English version)**REPUBLIC of BULGARIA
COUNCIL of MINISTERS**

The translation is not legalized and is provided by an expert of MoEW

D e c i s i o n № 8 2 1**from 29 December 2017**

For amendment and supplementation of decision N 646 of the Council of ministers from 2004 on the adoption of PNP Management plan (State gazette, N 73 of 2004)

Pursuant to Art. 60, para. 1 and Art. 63 of the Protected Areas Act in connection with Art. 20 of the Ordinance for development of management plans for Protected Areas, adopted with Decree No. 7 of the Council of Ministers from 2000 (promulgated, State Gazette, issue 13 of 2000, amended and supplemented, SG No. 55/2012 and No. 55 of 2017)

Council of ministers decided:

In the management plan of PNP, in Part 3. "Norms, regimes, conditions and recommendations for carrying out the activities" the following amendments and supplements are made:

1. In item 1:

(a) in sub item 1, a comma is added at the end and the words "in addition to those permissible in the relevant zones" are added;

(b) sub item 6 is amended as follows:

"6) Artificial illumination of territories out of the Tourism Zone and Zone of buildings and facilities;

2. In item 14, a new sub item 10 is created:

"10) Water catchment".

3. In Item 16 are created sub items 11 and 12:

"11) Activities related to establishment of ski runs and construction of cableways and accompanying technical infrastructure according to an approved development plan or amendment of such plan and investment projects/intentions on the basis of entered into force final acts for approval/adoption along with the procedures for strategic environmental assessment and environmental impact assessment pursuant to Chapter Six of the Environmental Protection Act and /or along the Appropriate assessment procedure under the Biological Diversity Act.

12) Artificial illumination for the purpose of ensuring service of the objects under item 11."

4. In item 17, sub-item 11 is created:

"11) Activities for extension of ski runs and construction of cableways within the boundary of zone III - Tourism zone according to approved development plan or amendment of such plan and investment projects/intentions on the basis of entered into force final acts for approval/adoption along with the procedures for strategic environmental assessment and environmental impact assessment pursuant to Chapter Six of the Environmental Protection Act and /or along the Appropriate assessment procedure under the Biological Diversity Act.

"5. In table 32 "Activities permitted in the different zones of the park's territory", on line 9 "Construction, repair and reconstruction, in item V.9, in column 3 "IIa Zone of conservation of the forest ecosystems and recreation" and in column 5 "III Tourism Zone", "dashes" are replaced by figure "3".

6. In item 76 a comma is added at the end and is added also "and Zone III - Tourism Zone".

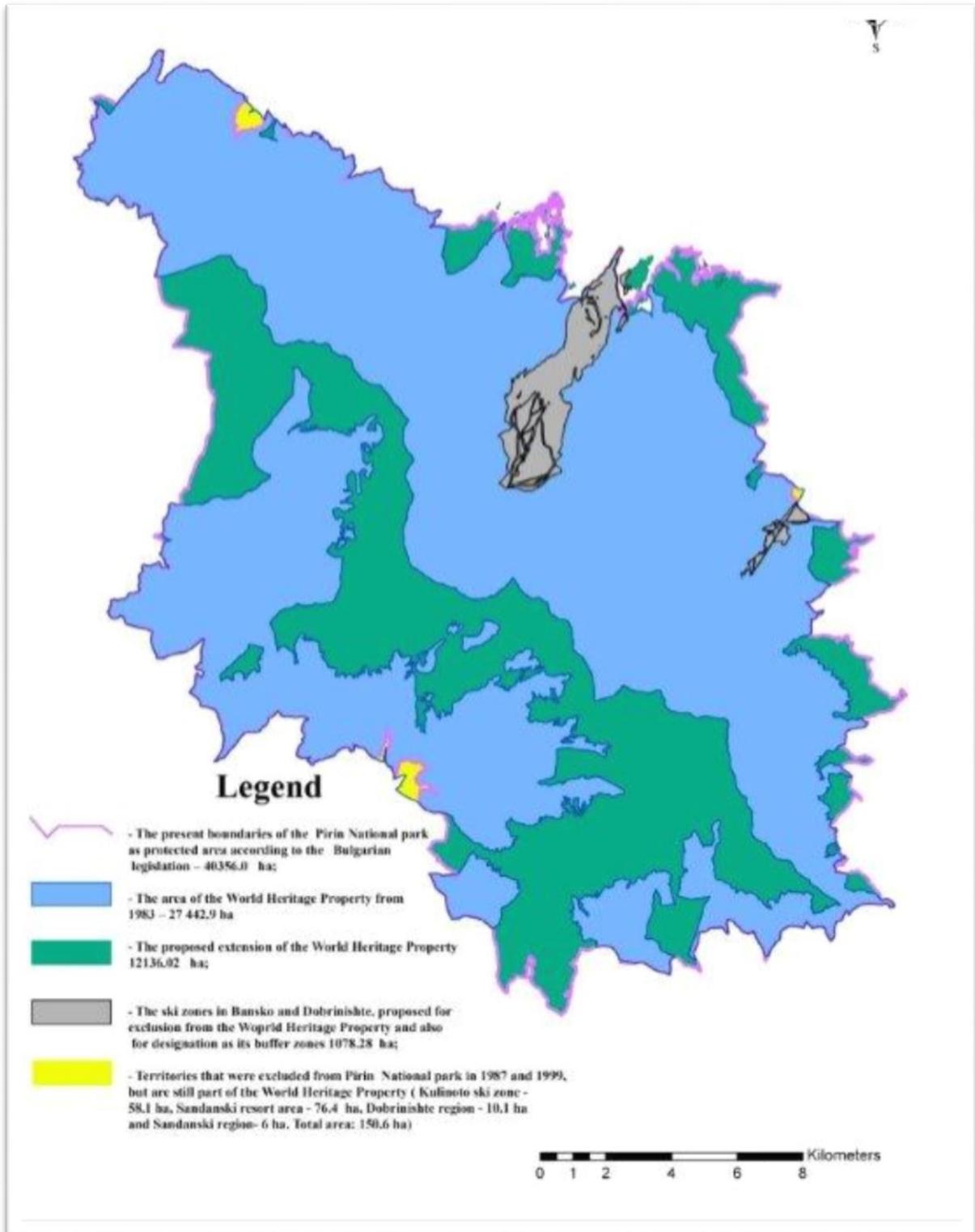
7. In point 77, sub item 13 is amended as follows:

"13) Activities related to establishment and extension of ski runs and construction of cableways and accompanying technical infrastructure within zone III - Tourism Zone and in the enclosed by its external borders zone IV - Buildings and facilities zone, according to approved development plan or amendment of such plan and investment projects / intentions on the basis of entered into force final acts for approval/adoption along with the procedures for strategic environmental assessment and environmental impact assessment pursuant to Chapter Six of the Environmental Protection Act and /or along the Appropriate assessment procedure under the Biological Diversity Act."

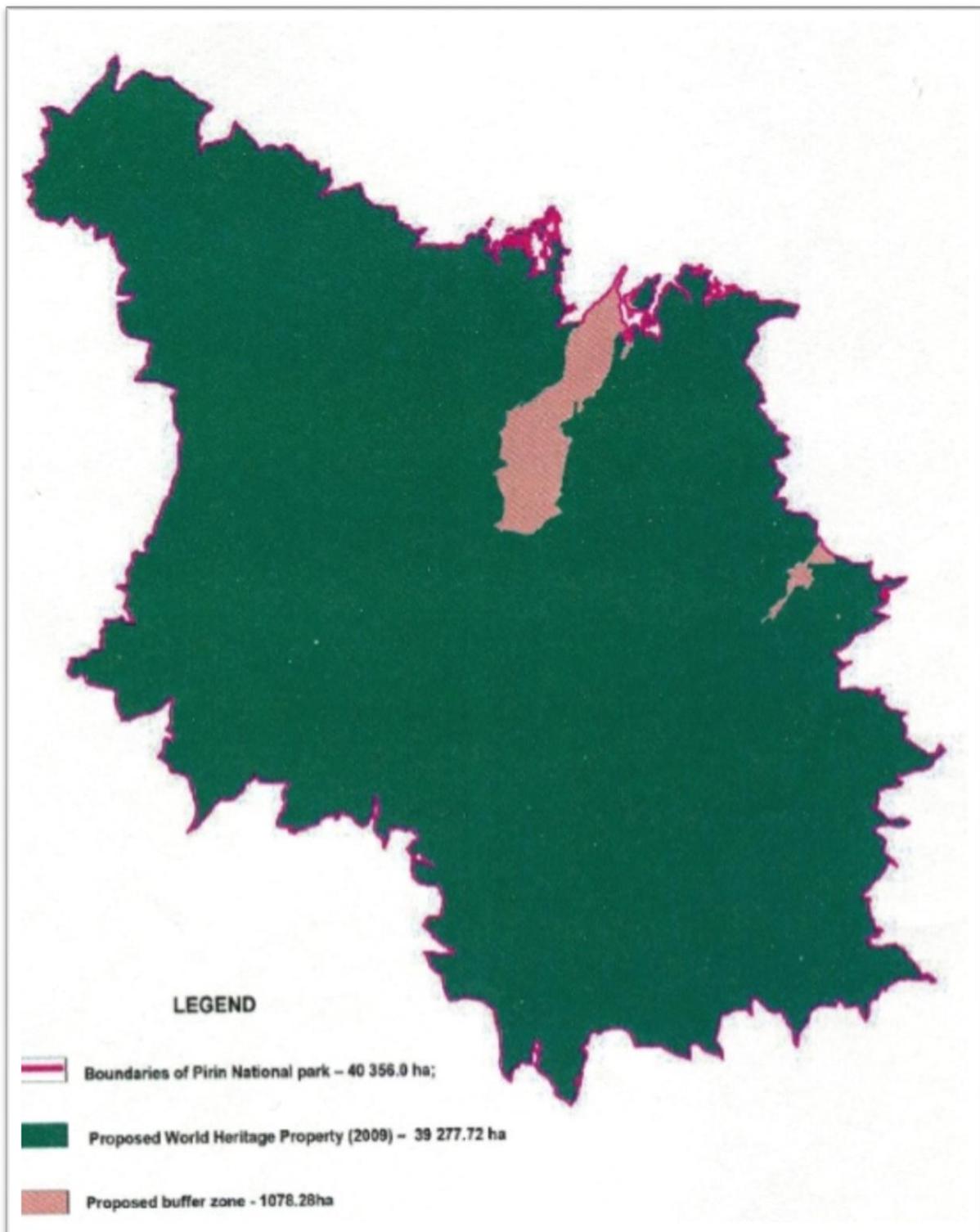
PRIME MINISTER: / / BOYKO BORISOV

**CHIEF SECRETARY of THE
COUNCIL of MINISTERS: / / VESELIN DAKOV**

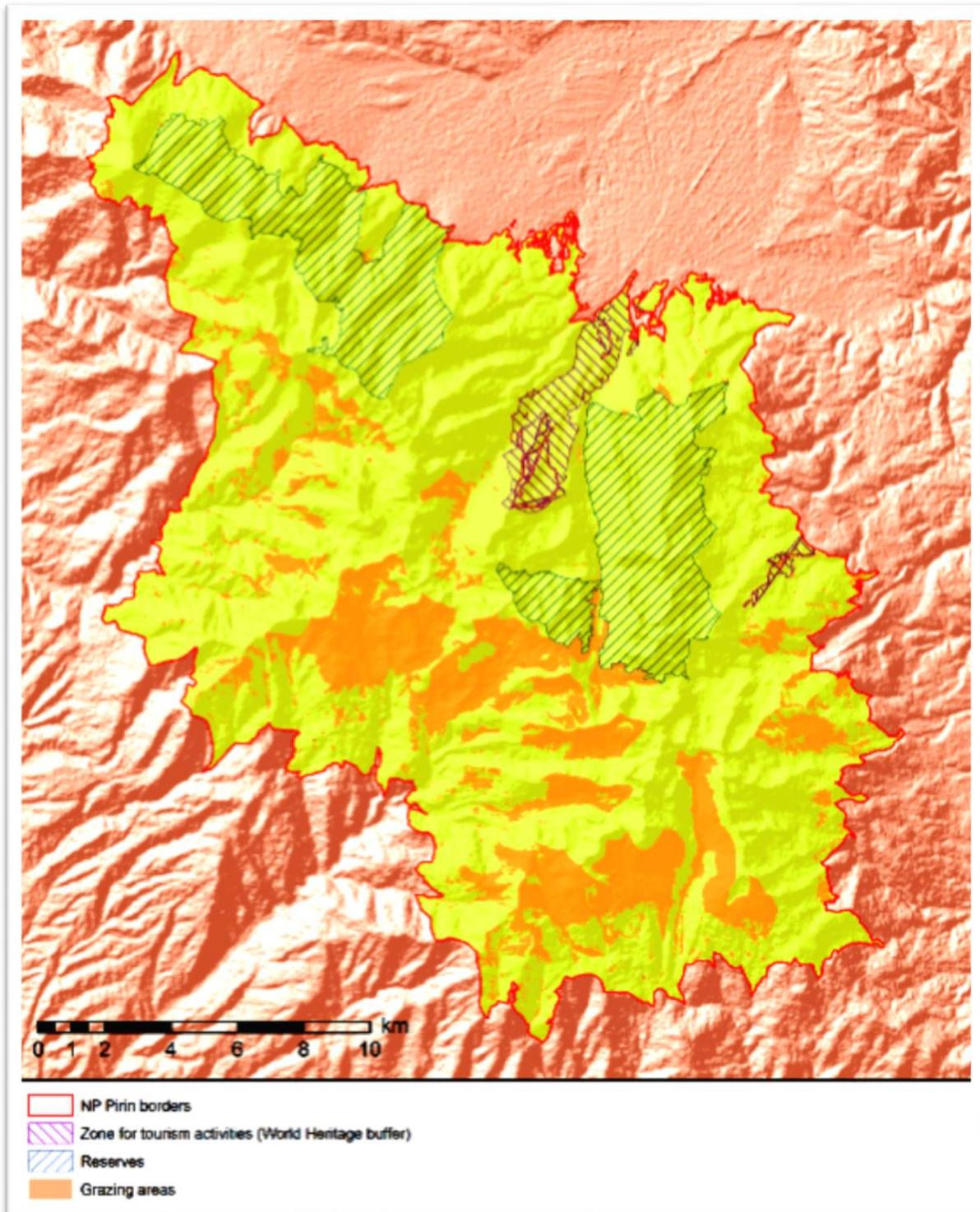
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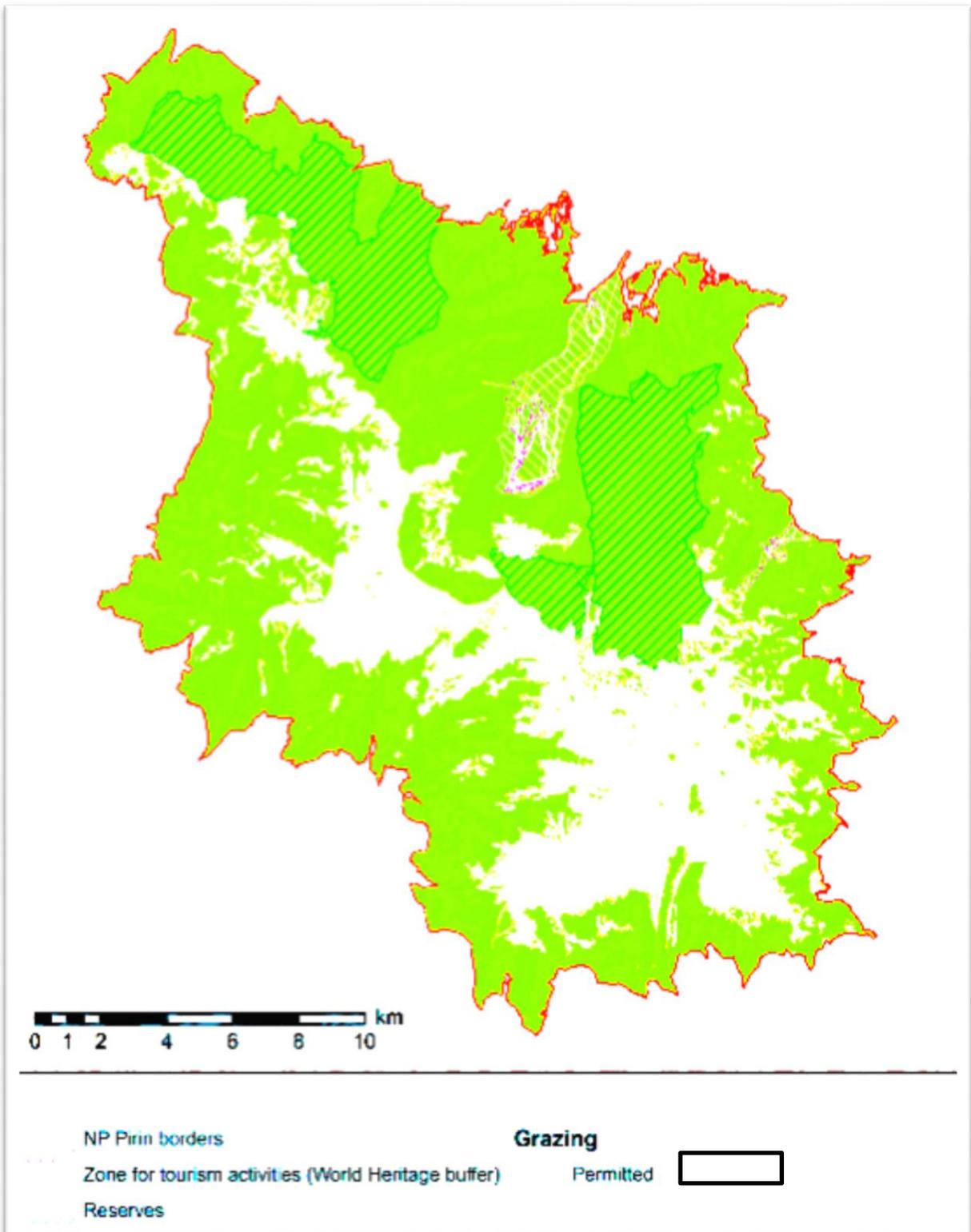
Map 1 – WH property as inscribed in 1983 (Source: UNESCO web site).



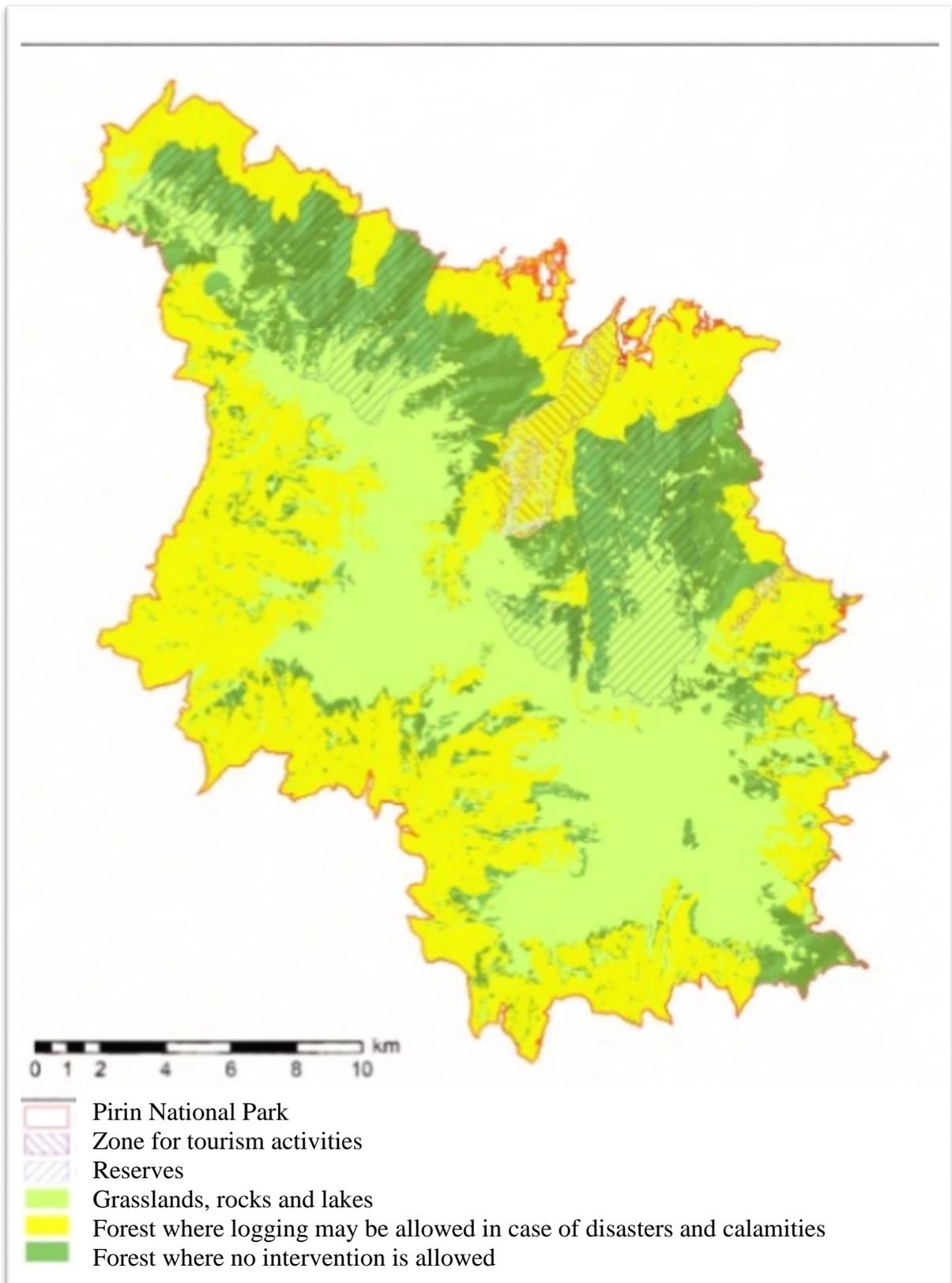
Map 2 – WH property as extended in 2010 (Source: UNESCO web site).



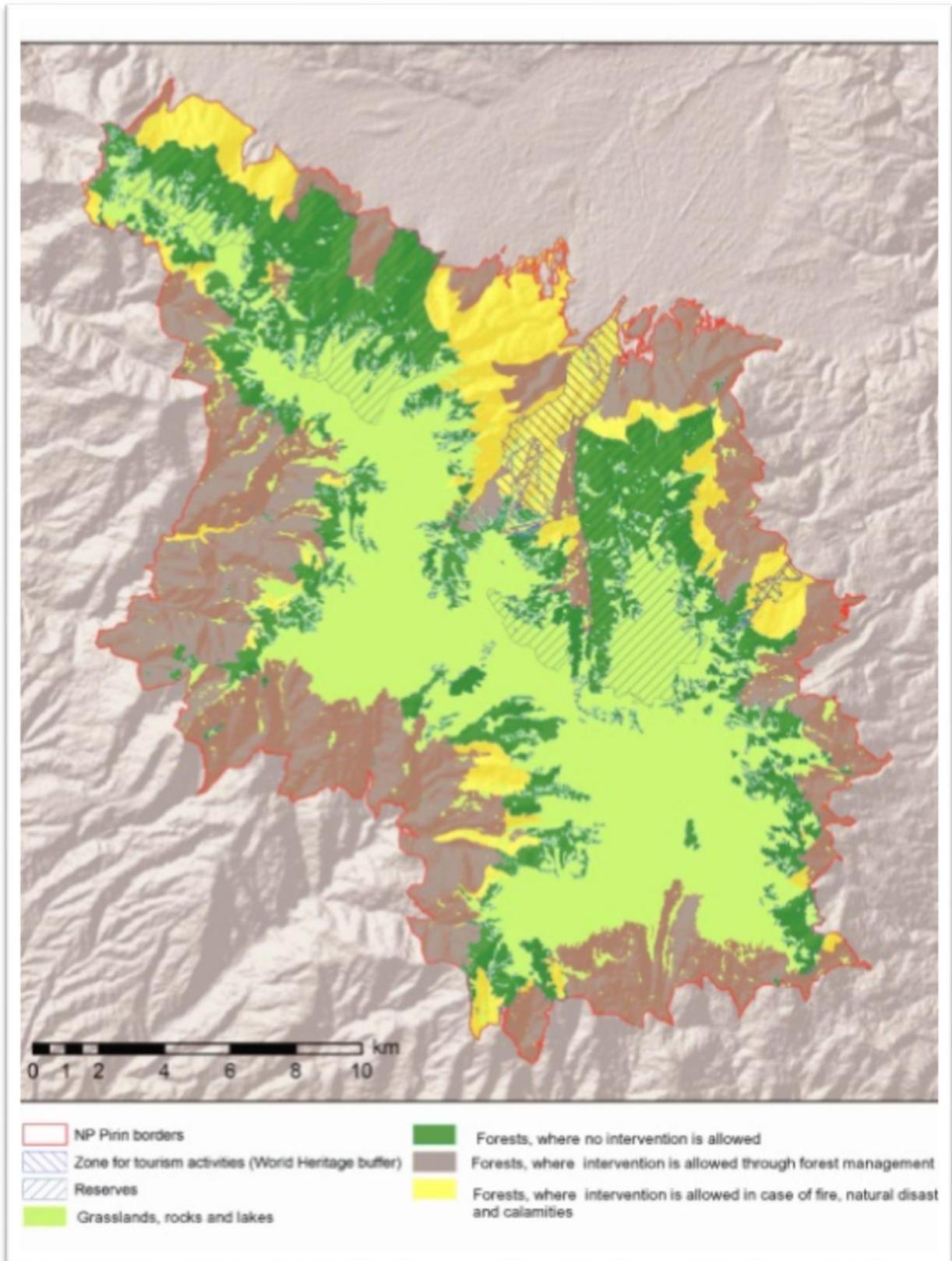
Map 3 – Grazing zone current PNP MP (Source: from the current PNP MP/MOEW).



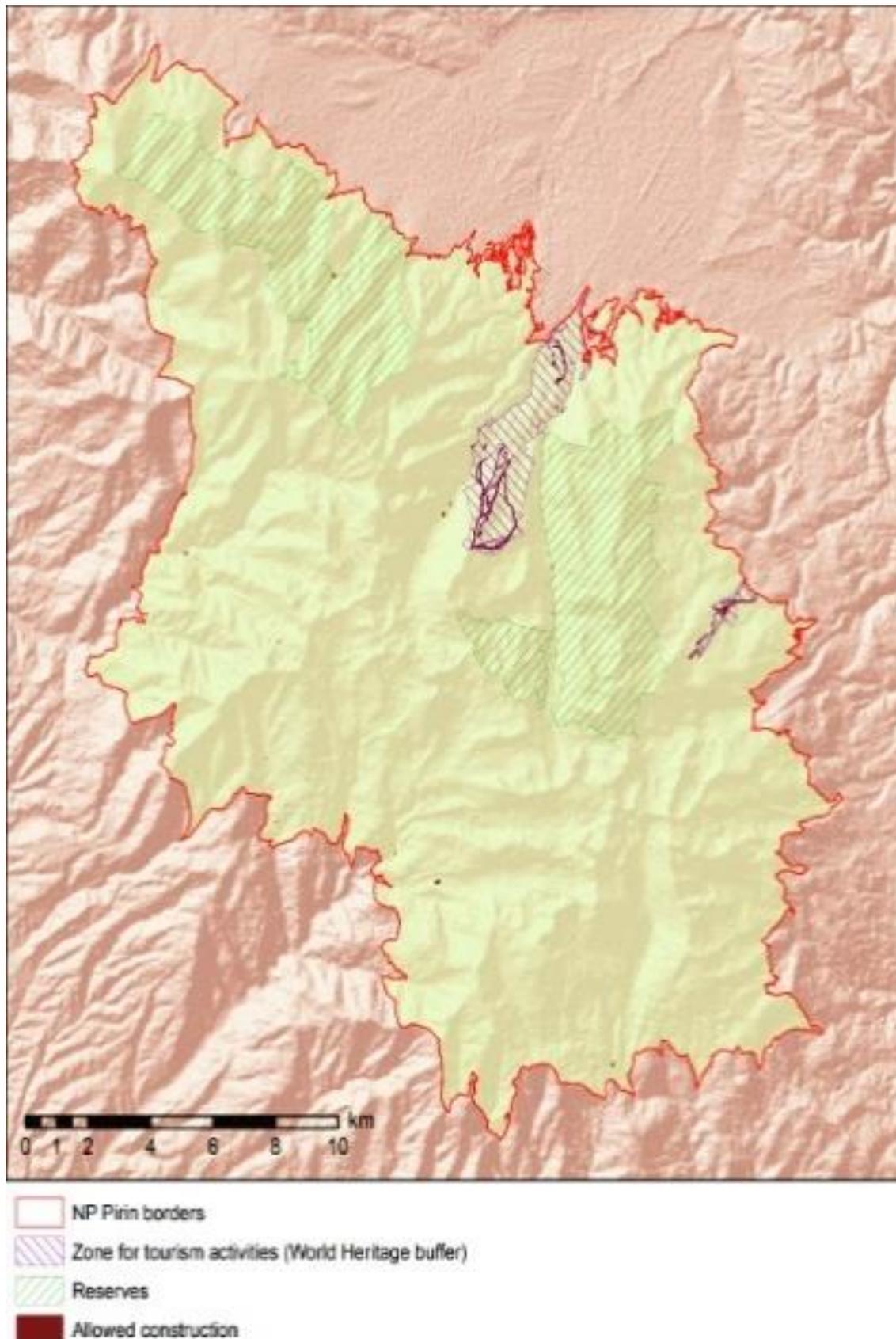
Map 4 – Grazing zone draft PNP MP (Source: from the draft PNP MP/MOEW).



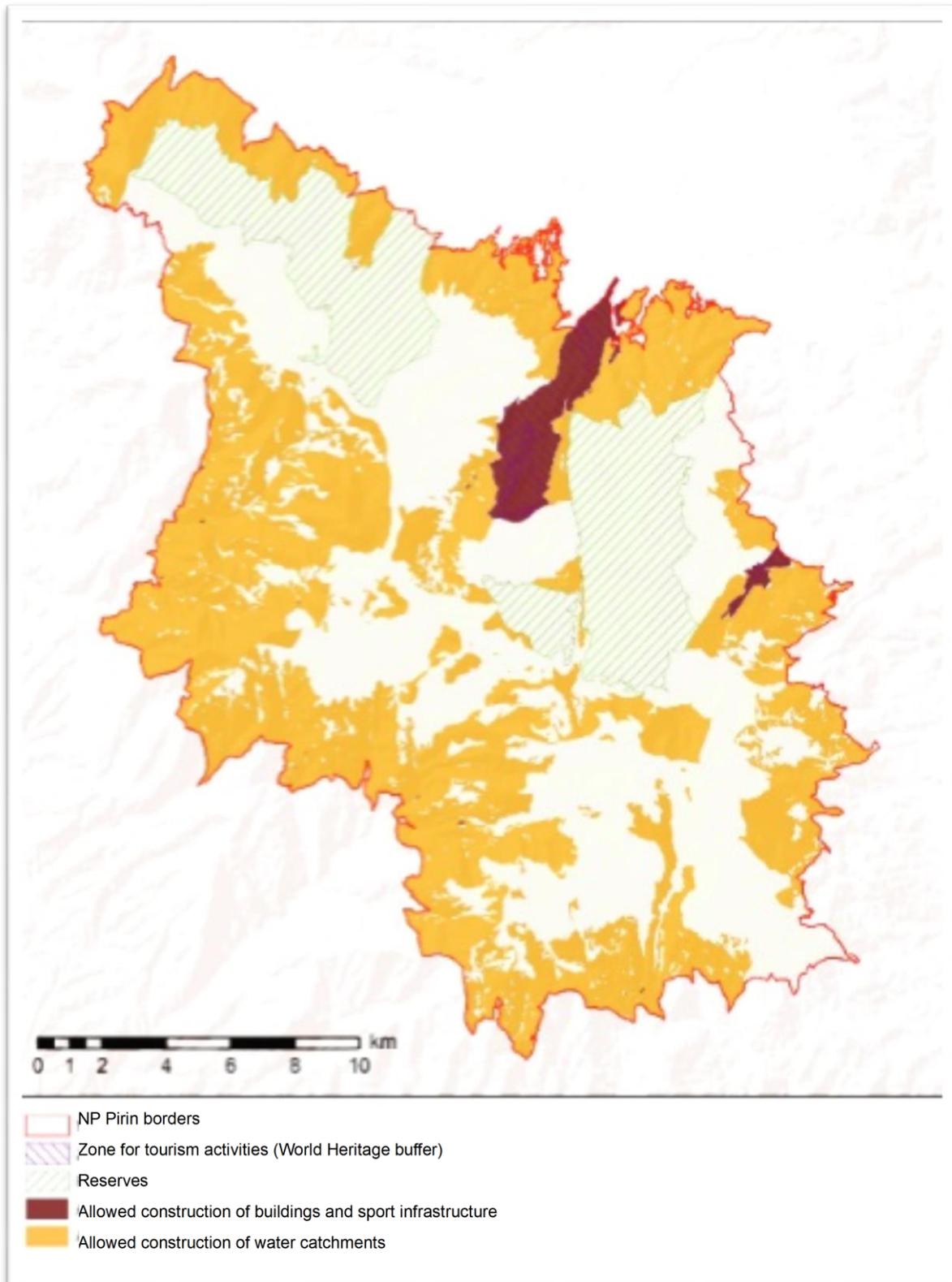
Map 5 – Forest management zone in the current PNP MP (Source: from MOEW).



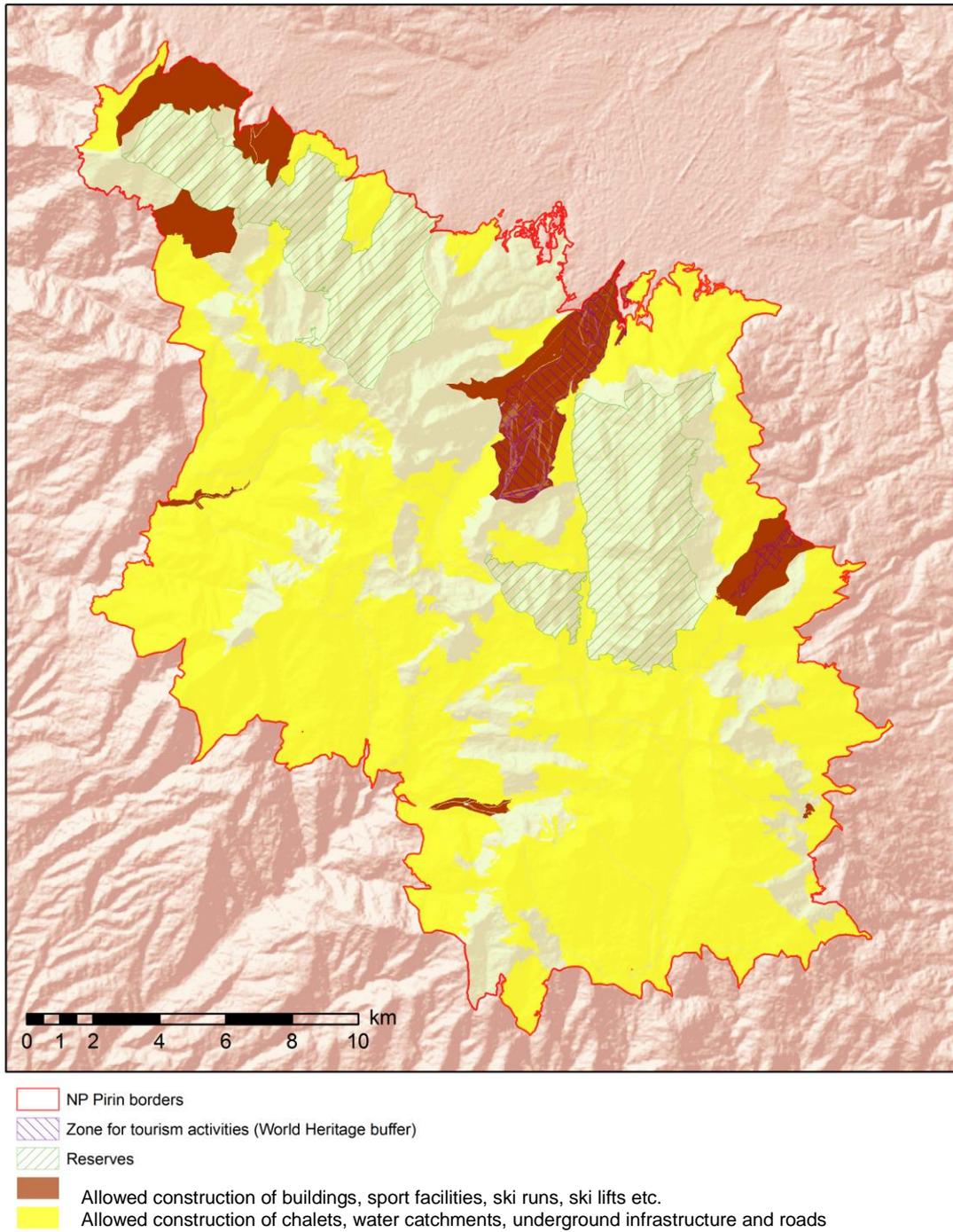
Map 6 – Forest management zone in the draft new MP (Source: from MOEW).



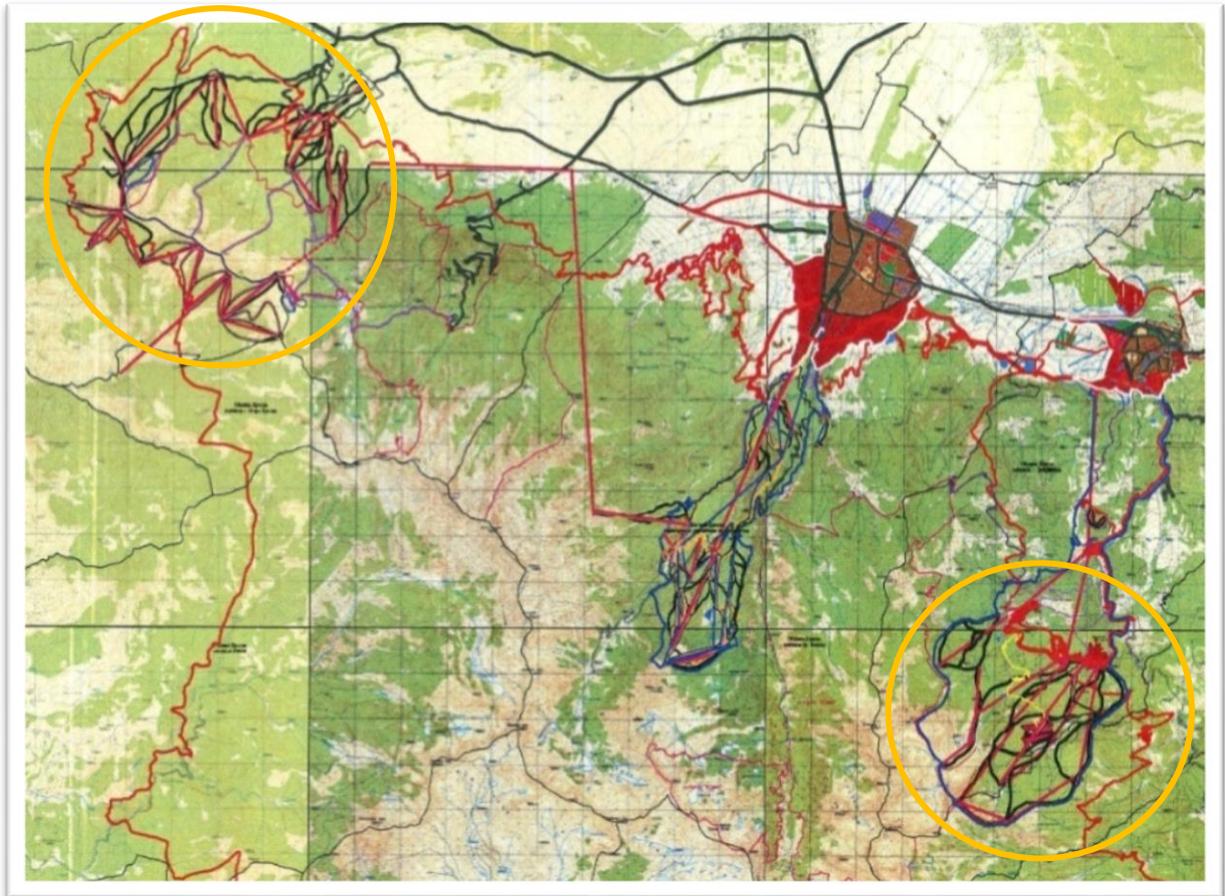
Map 7 – Comparative evolution of the touristic areas in the PNP (Source: from the current PNP MP).



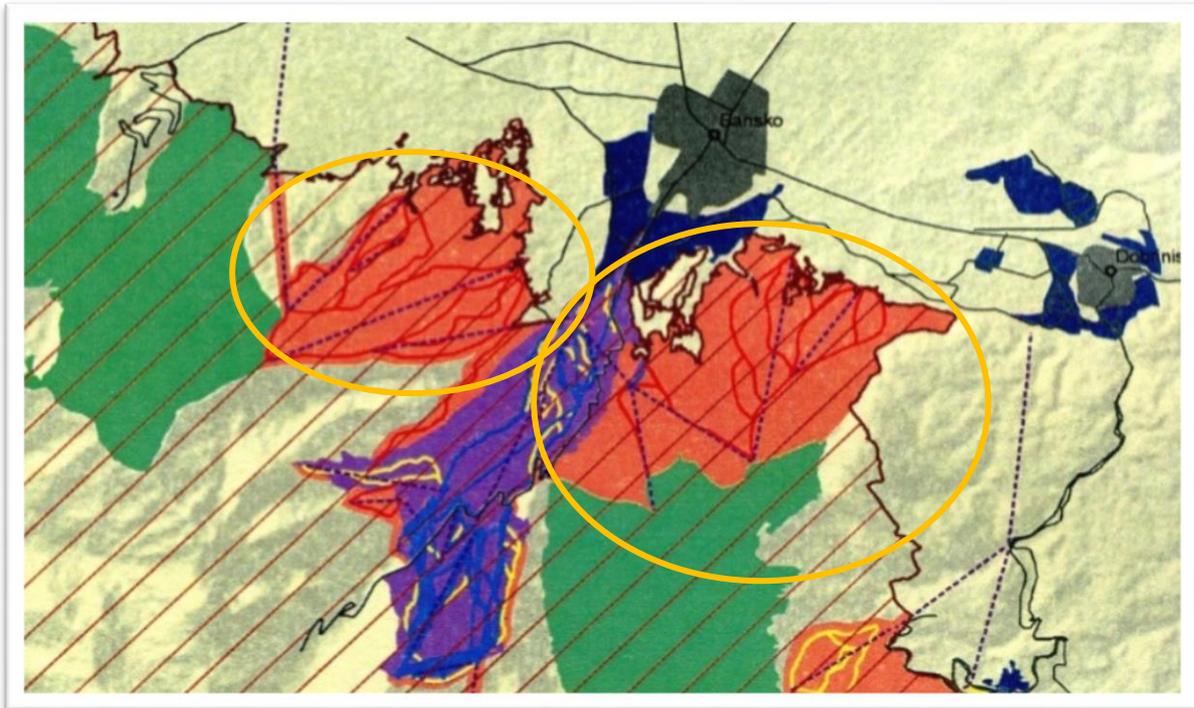
Map 8 – Comparative evolution of the touristic areas in the PNP (Source: from the December 2017 decision).



Map 9 – Comparative evolution of the touristic areas in the PNP (Source: from the draft new PNP MG/MOEW).



Map 10 – Plan for tourism development projects in the PNP area (Source: Internet).



Map 11 – Potential projects of new ski resorts in the property, near Bansko (Source: WWF).