



**REPUBLIC OF BULGARIA**  
**MINISTRY OF ENVIRONMENT AND WATER**

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95-00-6689/26.11.2019

**TO**  
**MECHTILD RÖSSLER**  
**DIRECTOR OF THE WORLD HERITAGE CENTER**

**COPY**  
**MR. ANGUEL TCHOLAKOV**  
**AMBASSADOR OF THE**  
**REPUBLIC OF BULGARIA TO FRANCE**  
**PERMANENT DELEGATE TO UNESCO**

**Subject:** *State of conservation report of Pirin National Park (PNP) World Heritage Property (WHP) (Bulgaria) in implementation of Decision 42 COM 7B.72 of the World Heritage Committee*

**DEAR MRS. RÖSSLER,**

In implementation of Decision 42 COM 7B.72 of the World Heritage Committee from its 42 session, held in Manama, Bahrein (2018), please find attached the State of conservation report of Pirin National Park World Heritage Property, elaborated in compliance with the indicative format for the submission of state of conservation reports by the States Parties.

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

**Attachment:** State of conservation report of PNP and WHP.

Sincerely yours,

**NENO DIMOV**  
*Minister of Environment and Water*



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## **STATE OF CONSERVATION REPORT**

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

#### **I. Executive summary of the report**

At present, the new Management plan (MP) of Pirin National Park has not been adopted, since Decision No EA-1/01.03.2017 of the Minister of environment and water, stating that “a Strategic Environmental Assessment (SEA) is not to be conducted” of the new MP, still is subject to judicial review.

With Decision 821/29.12.2017 of the Council of ministers an amendment and supplement of the current (acting) MP of Pirin National Park was adopted, by which was modified the regime of activities in the buffer zone of the Property (which is the “Tourism Zone” and the “Buildings and Facilities Zone”, located in it), and in another zone falling within the Property “Zone for conservation of forest ecosystems and recreation”.

The above Decision was appealed at the Court and was eventually repealed. The Ministry of environment and water (MOEW) complies with the final court decision and since the adoption of the amendments in the current MP no further actions with regard to development plans or investment proposals arising from Decision 821/29.12.2017 of the Council of Ministers have been taken.

The management plans define the general framework for management of a territory without pointing or creating pre-conditions for approval and without approving the construction of any facilities with specific details. The MP does not contain any certain Investment proposals (IPs) and does not provide for strategic planning or land use.

The amendments of the MP from December 2017, also did not provide for the construction of certain facilities or any other IPs, neither permitted their realization.

MPs determine conditions for carrying out of certain activities, however do not define any specific actions and projects to be effected in the future. Strategic planning follows with the spatial development plans which are subject to procedure for SEA and Appropriate assessment (AA) whereby the impact of the particular plan, resp. its provisions, on the environment and the protected areas is being assessed.

The participation of all relevant stakeholders is ensured on numerous stages in the course of elaborating the MP, spatial development planning, in the procedures for SEA etc. Bulgarian law envisages sufficient guarantees for compliance with the principles of public access to information, participation of stakeholders in the respective procedures and access to justice.

Decision No EA-1/01.03. 2017 of the minister of environment and water stating that “a SEA is not to be conducted” of the new MP is still subject to judicial review as MOEW has already declared that will comply with the final court decision when available.

In the process of elaboration and adoption of the new MP, will be taken into account the recommendations of the IUCN 2018 Advisory mission relevant to this process.

Other conservation issues related to the protection and the conservation of the Property have not been registered in the period 2018-2019.

In the considered period the MOEW did not approve significant projects and investment proposals in the Property and its buffer zone and respectively such have not been realized.

During this period within the boundaries of the Property and its buffer zone were approved and implemented insignificant investment proposals, related mainly to maintenance and improvement of existing facilities and a project for restoration of natural habitats, funded by Operational Program Environment. The above-mentioned investment proposals and project have been proceeded in line



with the Bulgarian environmental legislation and have been subject to the required assessments. It has been assessed that they will not cause damage to species and habitats under conservation in the National park, Natura 2000 site and World Heritage Property.

## **II. Response to Decision 42 COM 7B.72 of the World Heritage Committee, paragraph by paragraph.**

### **1. Having examined Document WHC/18/42.COM/7B.Add,**

### **2. Recalling Decision 40 COM 7B.93, adopted at its 40th session (Istanbul/UNESCO, 2016),**

The Ministry of environment and water (MoEW) as a responsible institution in charge of the management of Pirin National Park as a protected area under the Bulgarian legislation and as World Heritage Property also took note of document WHC / 18/42. COM/7B.Add and Decision 40 COM 7B.93, adopted at its 40th session (Istanbul/UNESCO, 2016).

### **3. Notes that the new Management Plan for the property could not yet be finalized due to Court proceedings regarding the procedures for the Strategic Environmental Assessment (SEA);**

At present, the new management plan for the Pirin National Park has not been adopted, since Decision No EA-1/01.03.2017 of the Minister of Environment and Water, stating that “a SEA is not to be conducted” of the new MP, still is subject to judicial review.

### **4. Noting the amendments to the current Management Plan for Pirin National Park adopted in December 2017 which now do not prohibit the construction of water catchment facilities within the property, requests the State Party to provide more detailed information on their potential extent, impacts and their relation to potential developments in the property’s buffer zone;**

With Decision 821/29.12.2017 of the Council of ministers an amendment and supplement of the current (acting) MP of Pirin NP was adopted, by which was modified the regime of activities in the buffer zone (which is the “Tourism Zone” and the “Buildings and Facilities Zone”, located in it) and in another zone falling within the Property -“Zone for conservation of forest ecosystems and recreation”.

The above Decision was appealed at the Court and was eventually repealed. The MOEW complies with the final court decision and in this line since the adoption of the amendments in the current MP no further actions with regard to development plans or investment proposals arising from Decision 821/29.12.2017 of the Council of Ministers have been taken.

### **5. Notes the amendments to the current Management Plan which now do not prohibit for replacement and increase in capacity of skiing infrastructure in the buffer zone of the property and requests the State Party to ensure that such developments will not impact on the Outstanding Universal Value (OUV) of the property;**

The MP is a framework document and determines only regimes – guidelines, rules, prohibitions etc. – for achieving the management objectives of the protected area. The MP defines the general framework for management of a territory without pointing or creating pre-conditions for approval and without approving the construction of any facilities with specific details. The MP does not contain any certain IPs and does not provide for strategic planning or land use.

The amendments of the MP from December 2017, also did not provide for the construction of certain facilities or other Investment proposals, neither permitted their realization.

Development and technical plans and projects may be drawn up based on the Management Plan for Pirin National Park. Pursuant to Bulgarian legislation, harmonized to the fullest extent with the EU legislation in the field of environmental protection, such plans and projects are subject to a



procedure of Strategic Environmental assessment (SEA) and Appropriate assessment (AA). Each particular investment proposal is also subject to a procedure of the Environmental Impact Assessment (EIA) and AA.

A particular construction can be effected solely after accomplishment of statutory procedures for construction permit and approval of investment projects, incl. only after conduct of procedures for EIA and AA.

This guarantees the exercise of control by the State upon the drawing up and the adoption of such plans and projects, as well as control with a view to the realization of future investment intentions aiming at compliance with the provisions of the Bulgarian and EU legislation in the field of environmental protection.

**6. Reiterates that any future developments within the buffer zone of the property need to be guided through strategic planning, and also requests the State Party to:**

Strategic planning of a territory cannot be made through the MP. MPs determine conditions for carrying out certain activities, however do not define any specific actions and projects to be effected in the future. Strategic planning follows with the spatial development plans which are subject to procedure for SEA and AA whereby the impact of the particular plan, resp. its provisions, on the environment and the protected areas is being assessed.

**- Implement the Supreme Administrative Court's Final Decision regarding the SEA procedure for the new Management Plan of the property when it becomes available,**

Decision No EA-1/01.03. 2017 of the minister of environment and water stating that "a SEA is not to be conducted" of the new MP is still subject to judicial review.

After the final court decision, the MoEW will comply with it.

**-Ensure that an SEA will be undertaken for the spatial planning based on the December 2017 amendments to the current Management Plan as a matter of priority; this SEA will include a specific assessment of potential impacts on the OUV of the property, including from potential development in areas located within the property and its buffer zone, and submit a copy of the results from the SEA to the World Heritage Centre for review by IUCN, once they become available,**

As stated above, Decision No 821 / 29.12.2017. of the Council of Ministers, which approved an amendment to the existing MP for the Pirin National Park, was finally repealed. In this regard, spatial planning based on the 2017 amendments has not been done and there is practically nothing to be evaluated through a SEA procedure.

**- Refrain from introducing any new amendments, until the procedure for SEA of the draft new Management Plan has been completed,**

Bulgaria complies with this requirement.

**- Once the results of the decision of the Supreme Administrative Court, concerning the SEA for the new Management Plan become available, ensure that the new Management Plan comprehensively addresses all potential threats to the OUV of the property and clearly outlines how the management objectives, zoning and land use within Pirin National Park will contribute to enhancing the OUV of the property and preventing any degradation of its integrity, and to take into account the relevant recommendations of the IUCN 2018 Advisory mission in the above process;**

Hereby, we confirm that we shall fulfill this commitment upon the elaboration and adoption of the New MP, incl. that the recommendations of the IUCN 2018 Advisory mission relevant to this process will be taken into account.



**7. Strongly encourages the State Party to develop a clear and comprehensive long-term vision for socio-economic development in the buffer zone of the property and the broader region, which would be in line with the goal of long-term protection of the property's OUV, ensuring that all relevant stakeholders are appropriately involved in the process, facilitated by external mediation, if necessary;**

The long-term vision for socio-economic development is determined by spatial development planning of the territory. The latter process includes assessment of the plans' and programs' potential impact on the environment, including on protected areas. Thereby, the goal of long-term protection of protected areas, including the property, is being observed.

The participation of all relevant stakeholders is ensured on numerous stages in the course of elaborating the MP, spatial development planning, in the procedures for SEA etc. Bulgarian law envisages sufficient guarantees for compliance with the principles of public access to information, participation of stakeholders in the respective procedures and access to justice.

**8. Further requests the State Party to submit to the World Heritage Centre, by 1 February 2019, a progress report with an update on the Supreme Administrative Court's ruling and by 1 December 2019, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 44th session in 2020.**

By February 1, 2019 the MoEW submitted to the Secretariat the requested progress report with an update on the Supreme Administrative Court's ruling.

The current SOC report is also in line with § 8 of the WHC's Decision.

**III. Other current conservation issues identified by the State Party which may have an impact on the Property's Outstanding universal value (OUV)**

Other conservation issues related to the protection and the conservation of the Property have not been registered in the period 2018-2019.

**IV. In conformity with paragraph 172 of the Operational Guidelines, describe any potential major restorations, alterations and/or new construction(s) intended within the Property, the buffer zone and/or corridors or other areas, where such developments may affect the Outstanding Universal Value of the property, including authenticity and integrity**

In the period 2018-2019 the MOEW did not approve significant projects and investment proposals in the Property and its buffer zone and respectively such have not been realized.

During this period within the boundaries of the Property and its buffer zone have been approved and implemented insignificant investment proposals (IP), related mainly to maintenance and improvement of existing facilities, as well as a project for restoration of natural habitats, funded by Operational Program Environment, listed below:

**- IP "Improvement of the conditions for access of people with physical disabilities in Yavorov Hut". The IP was approved with a letter of the MOEW from 13.03.2019.**

The IP is part of a "Pathways for Accessible Tourism Heritage" project, carried out under Investment Priority 6c: "Conservation, Protection, Promotion and Development of the Natural and Cultural Heritage" of the Cross-border Cooperation Program INTERREG V-A "Greece – Bulgaria" 2014-2020.

The IP aimed at improving the conditions for access and residence of people with motor and visual disabilities without disturbing the existing environment - natural and infrastructural.

The IP has been realized at Yavorov Hut, the locality of Suhodol, municipality of Razlog, Blagoevgrad region.



The IP included the installation of two signs indicating the possible access for people with disabilities; establishment of a new parking space for vehicles of disabled people; installation of a wheel - chair platform; establishment of accessible public toilet for disabled people in the existing sanitary facilities on the ground floor of the hut; installation of a Braille information board that provides information about the surrounding area of the hut and the history of the hut itself.

A scale model (relief image) at the hut's ground floor has been also ensured in order to allow the blind people to get oriented with the environment. Special equipment has been also installed - a tablet for the blind people with a router and wifi.

No new technical infrastructure has been built. Excavation works have been carried out only in order to put signs - on the local road.

**- IP "Strengthening and rehabilitation of the slope near the Tomba ski run, around 1825 m above sea level, located in Pirin National Park, Bansko Ski zone.** The investment proposal was approved with a letter of the MoEW from 20.04.2018

The purpose of the IP has been to strengthen and rehabilitate the slope near the Tomba ski run in order to ensure the safety of the slope in view of the danger for the users of the ski run and the road to Banderitsa Hut. Suspension of the erosion processes has been also envisaged and achieved by strengthening of the slope, by means of constructive erosion measures and appropriate for the place biological recultivation. The biological recultivation has been carried out in implementation of the MOEW's instructions given in Protocol (statement of findings) from 16.11.2017, which required such measures to be provided for the territory.

On the section, subject of the investment proposal, a wire mesh fixed with anchor bolts has been laid, a coconut erosion textile has been put in place and seeding with grass mixtures has been carried out. Small transverse grooves for the removal of surface water has been made.

The IP has been with recultivation character. During the implementation of the IP no water abstraction for drinking, industrial or other needs has been carried out and no trees have been removed.

The implementation of the investment proposal, which is within the scope of the ski run Tomba - Bansko has been completed.

**- IP „Recovery of the bearing capacity of clamping (pressing) Pillar No 3 and Pillar No 20 of the Passenger Rope Line from Gotse Delchev Hut to Bezbog Hut - Section II.** The IP was approved with a letter of MOEW from 11.07.2018.

The purpose of the IP has been to strengthen and recover the bearing capacity of Pillar № 3 and Pillar № 20 of the rope line (cableway).

In the operation of the passenger rope line from Gotse Delchev Hut to Bezbog Hut has been registered technical and constructional deficiencies and gaps in the design of the longitudinal profile of II section. The above adversely affected the operation of the rope line, resulting in increased vibrations of the main pillar due to the considerable for the height of the pillar loading and the weak and soaked with water ground around the foundations.

The above mentioned deficiencies were also registered with the Revision Act No 17/22.05.2018 issued by the State Directorate for State Technical Supervision, which gave instructions for stopping the passenger rope line from Gotse Delchev Hut to Bezbog Hut – Section II until the technical inconsistencies are corrected.

Within the IP, has been reconstructed the foundation of Pillar No 3 from section II by means of strengthening of the foundation and construction of a drainage system around it. The reconstruction of pillar No 20 included installation of metal elements, which to restore the bearing capacity, drain the foundation and the adjacent terrain from surface and groundwater.

The IP has been carried out on the territory of Pirin National Park, Dobrinishte ski zone, land of the town of Dobrinishte, municipality of Bansko, which is a buffer zone of the World Heritage



Property.

**- IP “Additional stabilization of the concrete of the old foundation of the clamping pillar No 20 of passenger rope line from Gotse Delchev Hut to Bezbog Hut”- II section.** The IP was approved with a letter of MOEW from 19.09.2018.

From the above is evident that, based on letter of MOEW from 11.07.2018, Pillar № 20 of passenger rope line from Gotse Delchev Hut to Bezbog Hut” - II Section has been reconstructed.

During the subsequent operation of Pillar No 20 have been identified problems with the strength of the concrete of the existing foundation. In this regard, with the aim of ensuring long-term sustainability in operation, it has been envisaged to protect the existing concrete from the environmental impact through additional covering of the existing concrete of the old foundation with a new concrete. The connection between the new and old concrete has been ensured with anchor bolts and chemical glue. Due to the reduced strength of the concrete on the old foundation, has been provided stronger connection (anchoring) of the base of the Pillar to the foundation with additional four tires.

The IP has been implemented in compliance with the conditions set by the technical project, elaborated by licensed experts.

The IP has been implemented on the territory of Pirin National Park, in Dobrinishte ski zone, in the lands of the town of Dobrinishte, municipality of Bansko, which is a buffer zone of the World Heritage Property.

**- IP “Supplementary Water supply of the town of Bansko from Karamanitsa locality - sub-project “Establishment of Water supply pipelines to water pressure reservoirs (tanks) in part of Pirin National park and in the lands of the town of Bansko, Bansko municipality, Blagoevgrad region”.** The IP was approved with a letter of the MoEW from 11.10.2018.

In connection with the additional water supply of the town of Bansko from the Karamanitsa locality in 2015 was approved IP and respectively a Detailed Arrangement Plan - Parcel Plan for the construction of water supply pipelines, leading to the existing water pressure reservoir “St. Ivan” and “High zone” water pressure reservoir.

The terrains where are located the routes fell within the scope of a local asphalt road in agricultural lands and partly on the territory of Pirin National Park. The part of the route and easement that fall within the boundaries of Pirin National Park are located in zone 4 “Buildings and facilities” which permits “Construction, repair and reconstruction of buildings, roads and facilities”.

In 2018 an amendment to the above project was approved. It was related to an amendment of the cadastral map and land registers of Bansko that was connected to the land plots which were subject of the IP. The amendment did not bring to a significant change in the character and the location of the facilities envisaged.

During the implementation of the IP has been used the existing infrastructure. The new facilities envisaged for construction and related to the water supply system included: water shafts, venting shafts and concrete thresholds. Construction waste has been transported to a designated Bansko depot.

Taking into account the location, the volume, the nature and the duration of the activities envisaged in the scope of the IP, as well as the fact that during their realization was not expected that natural habitats and habitats of species subject to protection in Pirin as Natura 2000 site will be affected, it was assessed that they were unlikely to cause a negative impact on protected sites of Natura 2000, respectively on the National park and the World Heritage Property.

The investment proposal has been accomplished.

**- IP “Construction (rehabilitation) of the external water supply system of the town of Dobrinishte, establishment of water supply pipelines and water catchments in part of the**



**Pirin NP and the land of the town of Dobrinishte, Blagoevgrad region.** The investment proposal was approved with letter of the MOEW from 08.11.2019.

The purpose of the IP is to ensure drinking water for the population. The IP foresees that most of the existing routes of the water supply pipelines located on the territory of the Pirin National Park will be reconstructed and in the rest part of the route will be built new ones, but within the existing road. The existing relief shafts, exhausts and vents, all catchments will be reconstructed, but will retain location. The existing water catchments on the territory of the Pirin NP will be reconstructed and their location will remain the same.

With regard to the treatment plant, it is located outside the boundaries of the Pirin National Park and the World Heritage Property.

Taking into account the location, the volume, the nature and the duration of the activities envisaged in the scope of the IP, as well as the fact that during their realization was not expected that natural habitats and habitats of species subject to protection in Pirin as Natura 2000 site will be affected, it was assessed that they were unlikely to cause a negative impact on protected sites of Natura 2000, respectively on the National park and the World Heritage Property.

The investment proposal will be accomplished in the future.

**- Project “Improvement of the conservation status of species and natural habitats on the territory of Pirin as Natura 2000 protected site - BG0000209 Pirin”, funded by the Operational Program Environment 2013-2020” with a beneficiary Pirin National Park Directorate.**

The project was approved with letter of MOEW from 16.05.2018.

The project is related to the management of Pirin National Park as a Natura 2000 site and includes activities aimed at improving the conservation status of natural habitats and species, set out as follows:

- improvement of the conservation status of forest habitat 9410 - Acidophilous Picea forests of the montane to alpine levels (Vaccinio-Piceetea) by carrying out of pest control activities (against bark beetles) on branches and stems.

- Improvement of the conservation status of oligotrophic lakes (Habitat 3130 - Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea) and Dystrophic lakes (Habitat 3160 - Natural dystrophic lakes and ponds) by monitoring possible changes in the water mirrors, studying of the hydrobiological status and preparation of methodologies for monitoring of the eutrophication in the target lakes, analysis of the results from the field activities and observations, preparation of a system of control measures for combating eutrophication in oligotrophic and dystrophic lakes, subsequent implementation of these measures and restriction of the grazing by surrounding with electric shepherds of Spanopol lakes, Prevalsko, Tevno and Bashliisk lakes.

- improvement of the conservation status of natural habitat 9410 Acidophilous Picea forests of the montane to alpine levels (Vaccinio-Piceetea) by regulating the movement of people and vehicles along particular sections of the road infrastructure;

- improvement of the conservation status of natural habitats 9410 Acidophilous Picea forests of the montane to alpine levels (Vaccinio-Piceetea), 95A0 - High oro-Mediterranean pine forests, 6170 - Alpine and subalpine calcareous grasslands, 62D0 Oro-Moesian acidophilous grasslands, 6430 - Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels, 8210 - Calcareous rocky slopes with chasmophytic vegetation, 3130 - Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or of the Isoëto-Nanojuncetea and 3160 - Natural dystrophic lakes and ponds, by rehabilitation of parts of the tourist routes in the Pirin National park and Natura 2000 site;

- Improvement of the conservation status of natural habitats and species in Pirin National Park and Natura 2000 site through fire prevention and fire fight measures.



- Improvement of the conservation status of Balkan chamois (*Rupicapra Rupicapra Balcanica*) and Brown bear (*Ursus arctos*) by establishing of a system for recording of shots;
  - Improvement of the conservation status of species and natural habitats by developing of a mobile electronic application with information about the existing regulated routes.
- The project implementation is still on-going.

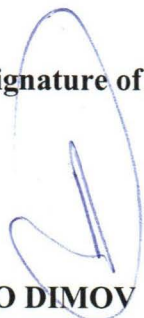
The abovementioned investment proposals and project have been proceeded in line with the Bulgarian environmental legislation and have been subject to a screening procedure for Environmental impact assessment under the Environmental Protection Act and an Appropriate Assessment for their compatibility with the conservation subject and objective of Pirin National Park as Natura 2000 site under the Regulation for Appropriate assessment.

It has been assessed that the above-mentioned investment proposals and project do not contradict to the regimes of Pirin National park, determined with the Protected areas Act, with the orders for its designation and boundary changes and with the management plan, as well as to the regimes of Pirin as Natura 2000 site. It has been assessed that the above mentioned investment proposals and project are not expected to cause damage to species and habitats subject of protection in the National park, Natura 2000 site and World Heritage Property.

#### **V. Public access to the state of conservation report**

The MOEW does not object the State of conservation report of Pirin National Park World Heritage Property to be uploaded for public access on World Heritage Centre's State of Conservation Information System - <http://whc.unesco.org/en/soc>).

#### **VI. Signature of the Authority**



**NENO DIMOV**  
**MINISTER OF ENVIRONMENT AND WATER**