

# ICOMOS

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES  
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES  
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS  
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

Our Ref. GB/EG/1718/IR

Charenton-le-Pont, 19 December 2023

H. E. Ms Simona Mirela Miculescu  
Ambassador Extraordinary and  
Plenipotentiary, Permanent Delegate  
Permanent Delegation of Romania to  
UNESCO  
Maison de l'UNESCO  
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## World Heritage List 2024

### Frontiers of the Roman Empire - Dacia (Romania) – Interim report and additional information request

Dear Ambassador,

As prescribed by the *Operational Guidelines for the Implementation of the World Heritage Convention* and its Annex 6, the Advisory Bodies are requested to submit a short interim report for each nomination by 31 January 2024. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation procedure.

The ICOMOS technical evaluation mission to the “Frontiers of the Roman Empire - Dacia” was carried out by Mr. Adrian Olivier (UK) in August 2023. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organisation and implementation of the mission.

On 4 October 2023, an additional information letter was sent by ICOMOS to request further information regarding the selection of component parts, the inclusion of existing World Heritage properties, potential development pressures, private ownership issues, conservation, tourism, visitor management and interpretation, reconstructions, modern visualisations and vertical buffer zones, legal protection, the management plan, the archaeological research strategy, and monitoring. Please convey our thanks to all the officials and experts for the additional information you provided on 10 November 2023 and for their continued cooperation in this process.

At the end of November 2023, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2024. The additional information provided by the State Party, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2024.

We thank you and your Delegation for your availability and your participation in the meeting held on 23 November 2023 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During this last part of the meeting, the Panel has identified areas where it considers that further information is needed.

Therefore, we would be pleased if the State Party could consider the following points:

### **Evidence and arguments about cultural interchange**

The arguments about the diversity and specificity of fortifications and the terrain of the Dacian Limes are well made, as are the observations concerning the relatively short period of the Dacian Province. However, at this stage, ICOMOS considers that the reasons provided for the justification of criterion (ii), is potentially applicable to all segments of the Frontiers of the Roman Empire and needs more precision. ICOMOS would be pleased if the State Party could provide additional information that identifies specific and distinctive aspects of cultural interchange that are demonstrated by the Dacian limes.

### **Boundaries and buffer zones**

ICOMOS is aware that a number of modifications to boundaries and/or buffer zones were discussed during the ICOMOS technical evaluation mission, and that some of these suggestions have already begun to be implemented by the National Limes Commission. ICOMOS also notes that the completion of LiDAR surveys have assisted in more precisely delineating some of the buffer zones.

ICOMOS would be grateful if the State Party could consider the suggestions of modifications to boundaries/buffer zones that are attached to this letter, although it is noted that there might be other revisions that have been identified by the nomination team and National Limes Commission. ICOMOS would be pleased if the State Party could provide a response about whether each of these suggestions could be implemented. Please provide revised maps for all completed and planned revisions to the boundaries and buffer zones, including the timeline for completion if these processes are ongoing by the deadline established for ICOMOS to receive additional information.

### **Management system**

ICOMOS notes the additional information about the management framework provided in November 2023, and understands that the management plan will be submitted prior to the deadline of 28 February 2024, enabling it to be included in the evaluation procedure.

In addition to providing this document, ICOMOS would be pleased if the State Party could provide additional information to update the progress made on the following aspects of the management system:

- How will the over-arching management framework be used to develop individual management plans? Is there an anticipated timeframe for those processes?
- To what extent will participatory mechanisms be addressed in the management plan of the nominated property? ICOMOS acknowledges that these will need to be tailored to the diverse social and physical environments that occur across the full extent of the Dacian Limes. How will this diversity be accommodated, yet coordinated across the large number of administrative units? What possibilities for participatory mechanisms aspect are under consideration?
- Annex 3 (Component parts) provides an excellent baseline of information that will need to be easily accessed for decision making at multiple levels. What plans or products are being developed to establish a portal to facilitate access to information for the many stakeholders that are involved in the nominated property?
- Finally, ICOMOS considers that a conservation plan would be needed as part of the management system. Could the State Party please provide additional information about whether this could be developed in the future, including the possibilities of expanding Annex 3 (Component parts) to identify conservation issues and record conservation interventions?

### **Interpretation strategy**

ICOMOS agrees with the importance that has been placed on an interpretation strategy to span the full nominated serial property and understands that this will be developed following the possible inscription of the nominated property on the World Heritage List. ICOMOS would be pleased if the State Party could

provide information on how the interpretation strategy will be structured, and how it might address the challenges of coordination of interpretation across such a large number and diversity of sites.

### **General Urban Plans**

ICOMOS notes the importance of the General Urban Plans in the implementation of the protection mechanisms, particularly in relation to buffer zones. It is understood that many of these are undergoing revision, and a timeframe was provided in the additional information of November 2023. ICOMOS is interested to better understand the relative priorities for these (in relation to the protection of the nominated component parts and their buffer zones), and whether there is any capacity for the program of revisions for the highest priority municipalities to be accelerated.

### **Heritage Impact Assessment**

At this stage, there is little information about formal mechanisms for Heritage Impact Assessment. ICOMOS would be pleased if the State Party could provide additional information about whether this is in place, and if not, how it could be implemented within the frameworks of legal protection.

The ICOMOS mission expert observed that several nominated component parts will be impacted by the construction of the A1 Trunk Road. ICOMOS would appreciate if the State Party could provide additional information about the steps that are being taken to mitigate the impacts.

We look forward to your responses to these points, which will be of great help in our evaluation procedure.

We would be grateful if you could provide **ICOMOS** and the **World Heritage Centre** with the above requested information by **28 February 2024 at the latest**, the deadline set out in paragraph 148 of the *Operational Guidelines for the Implementation of the World Heritage Convention* concerning additional information on nominations to be received. Please note that any information submitted after this statutory deadline will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any additional information submitted within the statutory deadline, it will not be possible to properly evaluate a completely revised nomination or a large amount of new information submitted at the last minute. ICOMOS would therefore be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation procedure.

Yours faithfully,



Gwenaëlle Bourdin  
Director  
ICOMOS Evaluation Unit

Copy to           Ministry of Culture  
                      National Institute of Heritage (INP)  
                      National Museum of Transylvanian  
                      UNESCO World Heritage Centre

**Attachment: Suggested revisions to nominated component part boundaries and/or buffer zones**

- Revisions to ensure the inclusion of the entire defensive perimeter and the whole of the interior of the fortress/fort (rather than excluding areas of modern housing): 1.3 Vărădia, 1.5 Berzovia, 1.7 Drobeta, 1.11 Zăvoi, 1.13 Sarmizegetusa, 2.1 Micia, 2.7 Războieni, 2.8 Turda, Ilișua – *Arcobara*, 5.1 Livezile, 5.2 Orheiu Bistriței, 6.15 Reșca – *Romula*, 7.2 Boroșneu Mare;
- Revisions to ensure the inclusion of the entire defensive perimeter and whole of the interior of the fortress/fort: 1.1 Pojejena Șitarnița, 3.4 Buciumi, Ilișua – *Arcobara*, 7.1 Brețcu;
- Revision to include the surviving stretch of Roman road linking 2.3 Geoagiu-Băi with the nearby fort 2.2 Cigmău to form a small cluster;
- Revision to ensure the inclusion of the whole surviving extent of the defensive circuit of the legionary fortress together with the whole interior: 2.4 Alba Iulia – *Apulum*;
- Creation of a more coherent boundary for 2.4 Alba Iulia-*Apulum* by including the full extent of the Governor's Palace in the relevant component part, and reviewing the justification for including Domus 1 and Domus 2 (2.4.4-5) as separate component parts;
- Amalgamating the following components and buffer zone: 6.13 Păușa - Arutela / Poiana Bivolari, and extending the buffer zone to protect the wider setting of the fort let within the gorge;
- Extending the buffer zone of 1.13 Sarmizegetusa *Colonia Ulpia Traiana* to include all the area of known/likely centuriation;
- Extending the buffer zone of 2.3 Geoagiu-Băi to the east to include the area occupied by the modern spa complex;
- Reducing the buffer zone to the west of 6.8 Racovița-Praetorium II Cetate and 6.9 Copăceni-Praetorium I Cetate and redefining the eastern portions to take account of the need to relocate parts of the village away from the new highway.