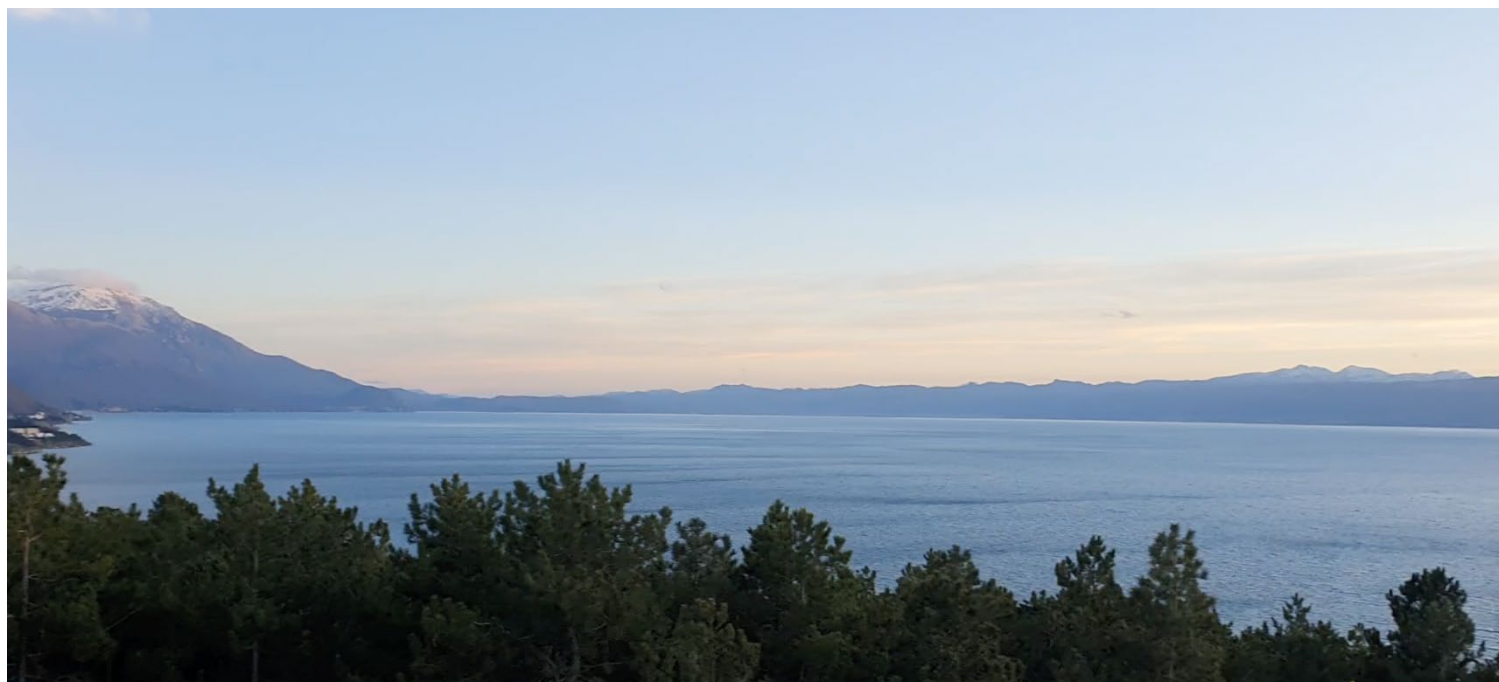


**REPORT ON THE JOINT WORLD HERITAGE CENTRE / ICOMOS INTERNATIONAL / IUCN
REACTIVE MONITORING MISSION TO**

NATURAL AND CULTURAL HERITAGE OF THE OHRID REGION

ALBANIA / REPUBLIC OF NORTH MACEDONIA



FROM 25 TO 29 MARCH 2024



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EXECUTIVE SUMMARY AND LIST OF RECOMMENDATIONS

The joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission to the property 'Natural and Cultural Heritage of the Ohrid region' was requested, as a matter of urgency, by the World Heritage Committee (Decision 45 COM 7B.104) in order to examine the effective implementation of the immediate emergency measures, the level of mobilisation and coordination of all the stakeholders involved as well as the implementation of the recommendations of the 2020 mission and the repeated requests of the Committee, and to assess the overall state of conservation of the property (paragraph 14 of Decision **45 COM 7B.104**). The governments of Albania and North Macedonia invited the World Heritage Centre, ICOMOS and IUCN to a joint mission to the property, which took place from 25 March to 29 March 2024.

The mission followed the Terms of Reference based on the latest Committee Decision (see Annex Ib). The mission was organized by the States Parties of Albania and North Macedonia separately with two discrete programmes. The mission experts arrived in Tirana, Albania on 24 March and held meetings and on-site visits both in Tirana and Pogradec, from 25 to 26 March and then on 27 March crossed the border to North Macedonia, where meetings and on-site visits were held in the Ohrid region and Skopje from 27 to 29 March. The mission experts departed from Skopje on 30 March.

In their visit to the component of the World Heritage property in Albania, the mission experts visited the Lin peninsula and the ruins of the Early Christian Church and its Mosaics, the prehistoric settlement of pile dwelling near Lin discovered in 2023, the Historic Centre of Pogradec, the Castle of Pogradec, the Drilon springs, and the Tushemisht village. They also held meetings with the Albanian national, regional and local authorities, including the Minister of Economy, Culture and Innovation, the vice-Minister of the Ministry of Tourism and Environment, and officials from the National Institute of Cultural Heritage and the National Commission for UNESCO, as well as regional and local leaders. In the component of the property in North Macedonia, the mission experts visited the site of Saint Naum, the Studenčišča Marsh, areas of the planned Railway Corridor VIII, Radozhda and its surroundings, the old city Centre of Ohrid and its castle, and met with the Ministers of Culture, Environment and Physical Planning, and Transport and Communications, as well as other senior national and local officials.

The mission notes that the state of conservation has not improved since the 2020 Reactive Monitoring Mission, and cumulative threats to the Outstanding Universal Value (OUV) of the property still persist while new threats have also emerged. The conclusions of the 2020 Reactive Monitoring Mission confirmed the threats and negatively affecting factors detected by the 2017 Reactive Monitoring Mission: these conclusions remain valid after seven years.

Despite some small steps in the right direction and some local improvements in the implementation of the necessary measures to safeguard the attributes that convey the OUV of the Natural and Cultural Heritage of the Ohrid Region, the property continues to face escalating threats and its overall state of conservation is highly vulnerable.

The water ecosystems and coastline of Lake Ohrid are central to the World Heritage property. Eutrophication, primarily from sewage contamination, stands as a critical factor contributing to the decline of endemic fish populations. In addition, nutrient uptake by the littoral ecosystem exacerbates eutrophication due to several factors: failing sewage systems, lack of wetlands to mitigate nutrient inflow, decreasing shore-zone functionality, and agricultural activities in the surrounding areas.

Runoff from the expanding road network, eroded hillsides, increased wildfire risks in the urban-wildland interfaces, illegal burning practices and ecological modifications, e.g., the construction of the promenade separating Studenčišča Marsh from the Lake, concrete platforms into the Lake, the upgraded road between Lin and Pogradec, new buildings in sensitive areas (e.g., in the Tushemisht and Gorica area), further exacerbate the concerns. Another concern is the decline of fish and bird populations and the loss of wetland-dependent species diversity due to the inadequacy of current

management measures. Biomonitoring efforts remain inadequate, while the ongoing development of a management plan, including zoning, is still in progress.

Despite the creation of protected areas within Lake Ohrid Region, shortcomings persist in their management, and the existing and proposed protected area categories fail to fully reflect the Lake's significance as a transboundary World Heritage property. Furthermore, the large-scale development around the Lake, particularly near the main urban centres such as Ohrid and Struga, in North Macedonia, and Pogradec, in Albania, has been eroding the qualities of the 'exceptional harmonious ensemble, which is one of the key features that make this region truly unique'¹. Inappropriate and unsustainable urbanisation and tourism infrastructure development have been reducing the understanding and appreciation of the qualities that supported the long-lasting development of ecclesiastical life along the shores of the Lake. The unique ancient urban entity of the old town centre of Ohrid has been negatively affected by innumerable interventions that cumulatively have been eroding its preservation and authenticity.

Coordination between the management of Lake Ohrid's components in North Macedonia and Albania is insufficient, hampering effective conservation efforts. Conservation measures are imperative to address the decreasing population of fish and birds.

The measures recommended by the World Heritage Committee in relation to the Strategic Recovery Plan and its actions, based on the recommendations of the 2020 Reactive Monitoring Mission, have been very limited in implementation, slow in implementation and in some cases not addressed at all, preventing the state of conservation of the property from improving and entering a positive trend of recovery of its integrity.

The mission observes that, in North Macedonia, there seems to be a good understanding of the gravity of the situation, at least among the technical staff of State agencies for natural and cultural heritage protection and conservation. What is lacking, however, is a coherent approach by high-level decision-makers at national and local levels, and a proactive recognition of the criticality of the property's conservation status. Intentions and willingness to address the deteriorating conditions of the World Heritage property are uneven, and the agenda of unsustainable forms of development based on construction, artificialisation of soil and encroachment on the property prevails over more sustainable strategies that are compatible with the World Heritage status and other international designations of the property.

In Albania, the excessive focus on the economic profits that can be drawn from the existence of places with natural and cultural values obfuscates the full and earnest appraisal of the extreme vulnerability of the property and its integrity. This lack of awareness, in turn, prevents the creation of a critical mass of willingness, intent and planning for the necessary change in direction.

The difficulty in acknowledging the extreme vulnerability of the property by key decision-makers does not allow for negative trends to be addressed and is likely to prolong and augment the threats to the attributes that convey the OUV of the Natural and Cultural Heritage of the Ohrid Region and its integrity and authenticity.

The conclusions and assessments of the 2017 Reactive Monitoring Mission on the factors affecting the property and its extreme vulnerability were confirmed by the 2020 Reactive Monitoring Mission and re-confirmed by the 2024 Reactive Monitoring Mission. The conclusions formulated by the two previous missions are not repeated in the current report, but are to be considered as an integral part of this mission report. However, the list of recommendations formulated by the 2020 Reactive Monitoring Mission is reproduced in this report, with updates on the progress of implementation and proposed new timeframes.

The serious deterioration of important attributes of the property's Outstanding Universal Value and its urban, rural and natural landscapes, caused by the threats already identified in 2020 – namely inappropriate interventions, negative impacts of urban development and inadequate spatial planning, eutrophication of the lake, large-scale infrastructure and other project proposals – is causing

¹ Criterion (i) of the Retrospective Statement of Outstanding Universal Value (RSOUV).

irreversible degradation unless decisive action is taken, with the result that the property may lose its outstanding universal value in the short to medium term. **The property therefore fulfils the criteria for inscription on the World Heritage List in Danger, as set out in paragraphs 179 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention.**

The direction undertaken in the Strategic Recovery Plan and its defined Actions is supported by the mission, but the process set up to address these Actions appears too fragile, is not equipped with the necessary human and financial resources for its implementation and lacks the necessary joint transboundary support at the highest decision-making level. It is essential that the Strategic Recovery Plan is given all the necessary institutional support, professional, human, financial and organisational means to ensure its steady implementation to assist the property to recover from the ascertained and potential dangers it has been facing, at least since 2020.

Transboundary cooperation is still very limited and needs to be improved and strengthened with a firm commitment at the highest decision-making level, as well as supported at the operational level with the allocation of appropriate resources and incentives to ensure the continued commitment of the staff of the relevant public institutions. High-level strategic directions for transboundary cooperation would need to be defined at the transboundary political level, based on clearly defined priority conservation needs for the property. The mission recommends prioritising aquatic ecosystems, coastal protection and reviewing inappropriate tourism facilities. The development of common principles and transboundary actions for the conservation of the entire lakeshore and coast of Lake Ohrid, encompassing territory both in North Macedonia and Albania, will ensure aligned conservation efforts and sustainable development practices.

In summary, the recommendations include 10 main areas that concern:

1. Permanently abandoning specific development plans, conducting studies for alternative routes such as in the case of the railway of Pan European Corridor VIII and reinstating a construction moratorium.
2. Rectifying the negative impacts of various activities and interventions on Lake Ohrid and its surrounding areas related to fish farms, irregular landfills and waste dumping and mining sites, permanent and non-permanent structures.
3. Strengthening the Strategic Recovery Plan by defining timeframes and indicative budgets for implementation, strengthening the staff and role of the national teams to implement the actions of the Strategic Recovery Plan.
4. Aiming to enhance the management framework and its effectiveness, promote collaboration at the transboundary and national levels, and allocate necessary resources for the protection and preservation of Lake Ohrid and its surrounding areas.
5. Fully aligning planning provisions by evaluating and revising existing and future planning provisions and ensuring their consistency with the protection of the Outstanding Universal Value (OUV) of the property.
6. Strengthening the protection of the property through national designations, implementing relevant laws, monitoring and mitigating environmental impacts, conserving cultural heritage, and involving local communities in conservation efforts. More specifically these include urgently designating Studenčišča Marsh as a protected area, identifying new potential protected areas in the coastal area of Lake Ohrid, enhance protection at St. Naum, implementing provisions of the 2018 Law on Cultural Heritage and Museums (Albania), designate the Lin peninsula as a protected cultural landscape and enforcing existing legal frameworks.
7. Undertaking Environmental and Heritage Impact Assessments (EIA and HIA) in accordance with the *Guidance and Toolkit for Impact Assessments in a World Heritage Context*. These assessments should evaluate the potential impacts of proposed projects, such as the A2 highway (all stretches) and the railway corridor VIII Kichevov-Lin, and be submitted to the World Heritage Centre before any final decision is taken. A Strategic Environmental Assessment (SEA) to assess cumulative impacts is pending, as requested by the Committee.
8. Further improving conservation conditions by addressing wastewater treatment, waste management, water quality monitoring, invasive species control, reintroduction of red deer,

assessing off-road vehicle tourism management in Galičica National Park, and transportation-related concerns on both sides of the Lake.

9. Enhancing community engagement and awareness of the property's values by promoting collaboration between the authorities and civil society, providing access to information, and developing educational programs, involving local communities and visitors, leading to a greater understanding and appreciation of the property's significance and to increased support for its preservation and sustainable management.
10. Provision by the States Parties of Albania and North Macedonia of updated information and documentation for the projects for which information has not been provided since 2020, in accordance with paragraph 172 of the Operational Guidelines.

More specific recommendations are contained under Chapter V of this report which also includes the list of recommendations of the 2020 Reactive Monitoring mission enriched with comments on their implementation status in 2024 and containing new recommendations (in blue) formulated by the 2024 Reactive Monitoring mission.

I. THE PROPERTY

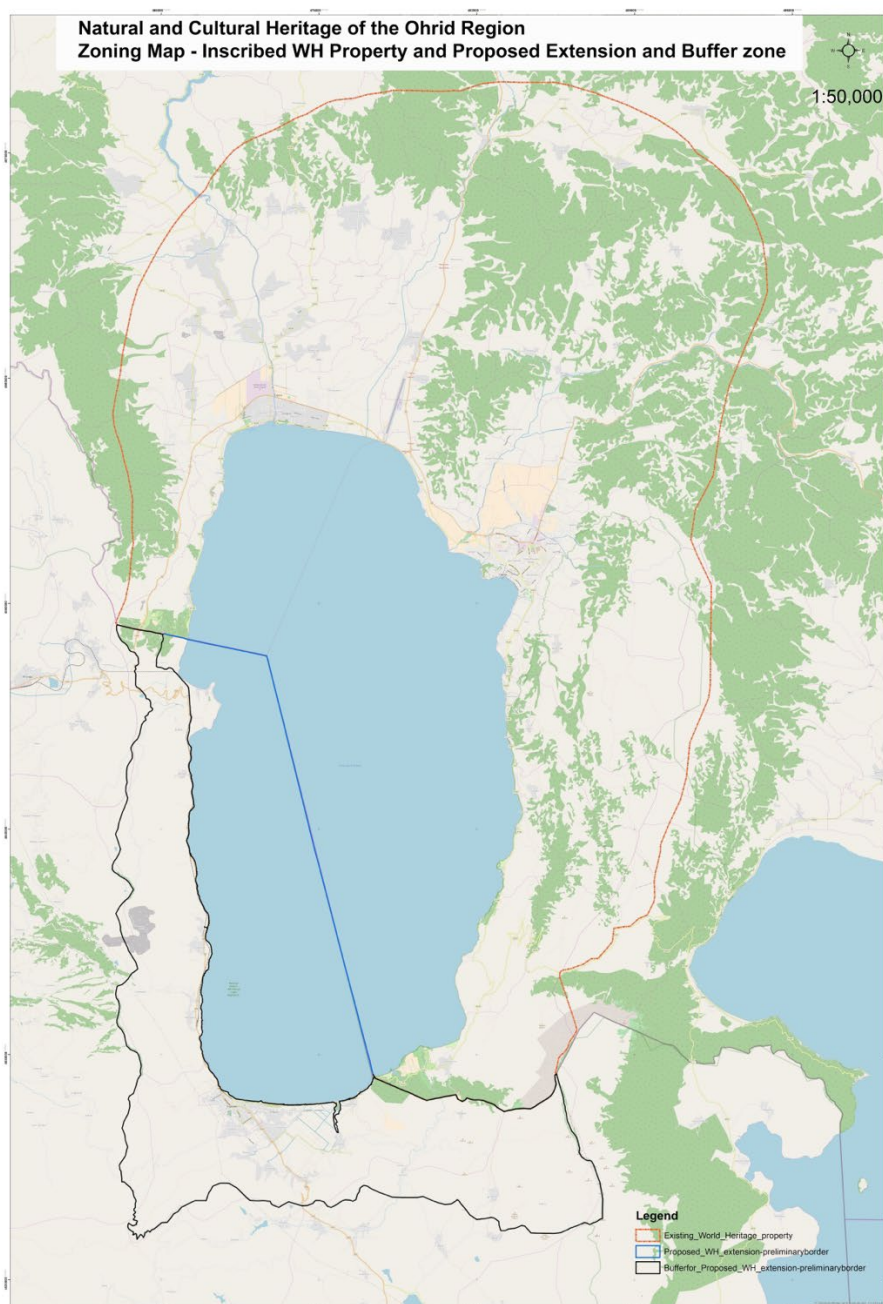


Figure 1. A 2019 map submitted by the States Parties as part of a significant boundary modification request to extend the property, which had been inscribed in 1979.

Background and Statement of Outstanding Universal Value

The ‘**Natural and Cultural Heritage of the Ohrid region**’ is a mixed transboundary World Heritage property covering ca. 94 729 ha and having a buffer zone of 15 944.4 ha in Albania. The property was first inscribed on the World Heritage List as a natural property in 1979, under natural criterion (vii)² covering only parts in North Macedonia (at the time Socialist Federal Republic of Yugoslavia).

² It is to be noted that in 1977 criterion (vii) was defined differently than today and was referred to as N(ii). At the time, it referred to “sites which contain unique, rare or superlative natural phenomena, formations or features or areas of

It was then extended in 1980, to include the cultural and historical area of the region under cultural criteria (i), (iii) and (iv) and again in 2019 to include the part of the Lake in Albania, thus making it a mixed transboundary site.

The Retrospective Statement of Outstanding Universal Value (RSOUV) for the property was adopted by the World Heritage Committee at its 39th session (Bonn, 2015). With the approval of its extension, adopted by the World Heritage Committee at its 43rd session (Baku, 2019), through a significant boundary modification proposed by Albania, the Statement of OUV incorporated reference to the whole inscribed property. The 2019 SOUV states that Lake Ohrid, a superlative natural phenomenon and a deep and ancient Lake of tectonic origin which has existed continuously for approximately two to three million years, hosts numerous endemic species of freshwater fauna and flora dating from the Tertiary period. Its oligotrophic waters conserve over 200 species of plants and animals unique to the Lake, including algae, turbellarian flatworms, snails, crustaceans and 17 endemic species of fish including two species of trout, as well as rich birdlife. In terms of cultural attributes, the town of Ohrid situated on the shores of the Lake is one of the oldest human settlements in Europe. Built mostly between the 7th and 19th centuries, Ohrid boasts exemplary religious architecture and is home to the oldest Slavonic monastery. The Ohrid region is a testimony of Byzantine arts, with several architecturally outstanding churches, 2,500 square metres of frescoes and more than 800 icons of worldwide fame. The development of ecclesiastical life along the shores of the Lake testifies to the significance of the region as a religious and cultural centre over the centuries. Ohrid's architecture represents the best preserved and most complete ensemble of ancient urban architecture of this part of Europe. The structure of the city nucleus is also enriched by a large number of archaeological sites, with an emphasis on early Christian basilicas, also known for their mosaic floors. The similarities between the mosaics of Lin church in the west of the Lake with those of the early basilicas of Ohrid to the east, reflect a single cultural tradition. A great number of archaeological sites indicates that the origins of pile dwelling sites along the Lake's shores date back to the Neolithic period, the Bronze Age, the Macedonian Hellenistic period, the Roman and the early Middle Age period. Seven basilicas have thus far been discovered in archaeological excavations in the old part of Ohrid. The convergence of well-conserved natural values with the quality and diversity of its cultural, material and spiritual heritage makes the Ohrid region truly unique.

The SOUV states that main threats to the integrity of the property include uncoordinated urban development, increasing population, inadequate treatment of wastewater and solid water and tourism pressure. In addition, pollution from increased traffic influences the quality of the water, which leads to the depletion of natural resources. In 2019, the highly endemic biodiversity and natural beauty of the Lake were assessed as being particularly vulnerable to changes in water quality, and there was alarming evidence of nutrient enrichment threatening the Lake's oligotrophic ecology. This oligotrophic condition was considered to be the basis of its nature conservation value and action to address this threat was identified as a priority.

In terms of authenticity, the SOUV states that although the town of Ohrid is reasonably well preserved, uncontrolled incremental interventions, infrastructure projects and other developments have impacted the overall form of the monumental urban ensemble as well as the lakeshore and wider landscape. The Lin church and its context is vulnerable to lack of protection and inadequately controlled conservation and development.

Concerning the protection and management requirements, the SOUV states that 'the property is managed and protected through a range of relevant management documents, and that an effective overall management plan is a clear long-term requirement... Integrated management of natural and cultural heritage through a joint coordinating body and joint management planning are urgently needed to ensure that both the natural and cultural values of the property are conserved in a fully integrated manner. Given the vulnerabilities of the property related to the development and impacts of tourism, the management requirements for the property need strengthening and new cooperation mechanisms and management practices must be put into place. This may include re-evaluating the

exceptional natural beauty, such as superlative examples of the most important ecosystems to man, natural features, (for instance, rivers, mountains, waterfalls), spectacles presented by great concentrations of animals, sweeping vistas covered by natural vegetation and exceptional combinations of natural and cultural elements".

existing protected areas and ensuring adequate financial and human resources for management as well as effective management planning and proper law enforcement. Whilst transboundary management mechanisms are set up on paper, these need to be actively and fully operational, on an ongoing basis, in order to ensure the transboundary cooperation required to secure the long-term future for Lake Ohrid. Adequate budgets also need to be provided, beyond the aspirations set out in the management documents for the property. Effective integration and implementation of planning processes at various levels, cross-sectorial cooperation, community participation and transboundary conservation are all preconditions for the successful long-term management of Lake Ohrid. A range of serious protection and management issues require strong and effective action by the States Parties, acting jointly for the whole of the property as well as within each of their territories. These include the urgent need to protect the water quality of the Lake and therefore maintain its oligotrophic ecological function; to tackle tourism and associated legal and illegal development and the impacts of development on habitats and species throughout the property, including on the lake shores. Resource extraction also needs to be effectively regulated, and enforced, including in relation to fisheries and timber harvesting; and action is required to protect against the introduction of alien invasive species. There is also evidence of climate change impacting the property, such as through the warming of the Lake, which requires international attention as such issues cannot be tackled at the local level³..

State of conservation and related World Heritage Committee Decisions

The World Heritage Committee examined the state of conservation of this property seven times between 1998 and 2023.

The last mission, a joint World Heritage Centre/ICOMOS International/IUCN Reactive Monitoring mission, visited the property in January 2020 and concluded that the actions requested since 2017 had not been completed to address the vulnerabilities and threats then identified, with the result that the gradual erosion of attributes had not been halted, threatening projects and plans were still evolving and further new threats had been brought to the attention of the Mission. The Mission further concluded that the property was highly vulnerable due to significant management issues and poor implementation of the legal framework, that had led to inappropriate interventions, negative effects of town planning and large-scale project proposals, all of which had resulted in severe deterioration of the property's urban, rural and natural landscapes, and the key attributes that convey its OUV. The Mission also concluded that the property faced both actual and potential threats to its Outstanding Universal Value in accordance with paragraphs 179 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention meeting the conditions for inscription on the List of World Heritage in Danger.

Subsequently, the World Heritage Committee, in its Decision **44 COM 7B.77** noted with grave concern the conclusions of the 2020 mission, finding that:

- regarding North Macedonia, there had been insufficient action to halt the slow erosion of the attributes of the Outstanding Universal Value (OUV) in the urban fabric and the wider landscape arising from inappropriate conservation, reconstruction and development, or to reconsider alternative outcomes for major projects relating to railway and road development, and (paragraph 5a)
- regarding Albania, the acute vulnerabilities that were noted at the time of the extension of the property had not been curtailed and new projects and new developments were being planned that could be highly detrimental to the already compromised lakeshore and the Lin peninsula (paragraph 5b)
- in spite of recent initiatives, the management system still appeared not to be fully mandated to maintain OUV due to conflicting priorities, poor implementation of the legal framework and little involvement of civil society, all of which had combined to fragment the management system (paragraph 6).

³ The full Statement of OUV for the property is available at <https://whc.unesco.org/en/list/99/> and in Annex V.

The Decision further considered that halting and reversing the degradation that is now facing the property, which reflects the cumulative impact of inappropriate changes and lack of conservation over many years, will take considerable concerted efforts over a long timespan, and that, while the immediate actions to halt certain activities were welcomed, these were insufficient and can only be seen as the beginning of a much longer integrated and strategic process, which remains to be defined.

It therefore urged the two States Parties to develop a detailed Strategic Recovery Plan with an associated Action Plan clearly defining aims and outcomes to mitigate threats to the property's OUV with a set of agreed actions including a timeframe both in the short and longer term as well as a phased action plan, based on the full recommendations of the 2020 mission, and which would provide an overarching transboundary political and institutional framework for addressing the severe and multiple threats facing to the property (paragraph 11).

While acknowledging the initial efforts made by States Parties to address the threats to the property, decision 45 COM 7B.104 regretted that tangible results had not yet been achieved and that the lack of a coherent vision shared by all actors undermined efforts to address the ever-emerging threats to the OUV of the property. It therefore urged the States Parties to implement immediate emergency measures to address existing threats and prevent emerging threats from negatively impacting the OUV (paragraph 12). The strengthening of the transboundary coordination in addressing these threats was therefore requested by the Committee (paragraph 13). The joint efforts of the States Parties to develop a Strategic Recovery Plan for the property were welcomed by the World Heritage Committee, which requested the States Parties to ensure the inclusion of an implementation timeframe, budget and prioritisation for each action in the Strategic Recovery Plan, the extension to Albania of the implementation of actions planned only for North Macedonia but relevant to both States Parties, and the establishment of adequately resourced and mandated national teams to liaise and coordinate with all relevant institutions to ensure the integration of the actions of the Strategic Recovery Plan into national policies and plans, as well as inter-institutional efforts to halt and reverse the threats and achieve the goals set out in the Strategic Recovery Plan.

The Committee further noted with serious concern the assessment made in Chapter 4 of the Strategic Recovery Plan regarding the vulnerability of the property and the negative factors affecting it and urgently requested that Amendments to Detailed Urban Plans and approval of Local Development Plans outside settlements be suspended until a Heritage Impact Assessment at the strategic level was carried out and demonstrated that the attributes underlying the property's Outstanding Universal Value (OUV) were not adversely affected by these plans and that the General Urban Plans for Ohrid and Struga and the spatial planning instruments for non-built-up areas be elaborated as a matter of urgency and in full respect of the attributes underlying the OUV of the property.

A revised Strategic Recovery Plan together with a joint State of Conservation report was submitted by the States Parties for examination by the World Heritage Committee at its 46th session. In the short term, the Plan aims at mitigating and reducing the threats and factors that may have a negative impact on the OUV of the site. Its implementation over a longer period of time should ensure removal of threats to the property's OUV, the establishment of a functional system for the management of the site that will prevent returning of old threats and creation of new ones and will contribute to the recovery of the OUV. The Action Plan is an integral part of the Strategic Recovery Plan defining recovery measures, as well as indicators on the basis of which will be determined whether the goal defined by the measure has been achieved.

II. SUMMARY OF THE NATIONAL MANAGEMENT SYSTEM FOR THE PRESERVATION AND MANAGEMENT OF THE WORLD HERITAGE PROPERTY

Note that this chapter complements the corresponding chapter 2 'National Policies and Transboundary Arrangements for the Preservation and Management of the Property' of the 2020 Joint World Heritage Centre/ICOMOS/IUCN Reactive Monitoring mission (27-31 January 2020).

National legislation

The Natural and Cultural Heritage of the Ohrid region has several layers of legal protection. Since the time of the 2019 significant boundary modification proposed by Albania of the Natural and Cultural Heritage of the Ohrid region, in North Macedonia, the protection of cultural heritage is regulated by the Law on Cultural Heritage Protection (Official Gazette of the Republic of North Macedonia No. 20/04, 115/07), by-laws and a law declaring the old urban Core of Ohrid as Cultural Heritage of Exceptional Significance (Official Gazette of RNM No. 47/11 and 154/15). The Law on Managing of the World Natural and Cultural Heritage of the Ohrid Region (Official Gazette of the RNM No. 75/10) regulates the rights and obligations of the country and of the municipalities Ohrid, Struga and Debrca, as well as the rights and obligations of the legal and physical entities related to the management of the World Natural and Cultural Heritage in the Ohrid Region. Other laws regulating the natural heritage in North Macedonia are the Law on Environment, the Law on Nature Protection, the Law on Waters, the Law on Protection of the Ohrid, Prespa and Dojrian Lakes, the Law Declaring the Forest Areas of Galičica Mountain a National Park, the Law Declaring a Section of Galičica Mountain a National Park, the Law on Forests and the Law on Pastures). Several laws regulate urban development and change of use of land such as the Law on Physical and Urban Planning, the Law on Building, the Law on Construction Land and the Law on Identification of the Legal Status of Illegally Built Facilities.

In Albania, the Pogradec Terrestrial/Aquatic Protected Landscape (PPL) was legally established in 1999 to protect both terrestrial and aquatic eco-systems, and covers the entire area of the property and its buffer zone. The main national legislation in Albania consists of the Law on Cultural Heritage and Museums, No. 27/2018, which includes a chapter on cultural landscapes and establishes that sea and lake coastal areas are automatically protected by law up to 300m from the coastline, rivers and streams and other water sources, as well as parks, national and local reserves, forest areas and areas of archaeological interest, and the Law on Administrative Territorial Reform, No. 115 /2014, of 31.06.2014, which establishes the new administrative and territorial organisation of local government in Albania, the aims, principles and objectives of planning, the planning authorities and the levels of planning. The key instrument for planning is represented by the General Local Plan.

As reported in the States Parties report on the state of conservation in 2024, Korça Regional Department of Cultural Heritage (RDCH) has prepared and submitted to the National Institute of Cultural Heritage (NICH) the draft report for the proposal to declare the village of Lin 'protected landscape'. The preliminary draft report currently is being reviewed by NICH and after being finalized will be presented for approval in National Council of Material Cultural Heritage (NCMCH) and other relevant institutions. When this proposal will be fully adopted, it will implement one of the 'urgent' 2020 RMM recommendations requesting to 'proceed as a matter of urgency to designate the whole Lin peninsula as a protected cultural landscape according to the provisions of the Law on Cultural Heritage and Museums'.

Other Laws supporting the management of the property in Albania include the Law on Local Self-Government, No.139/2015, dated 17.12.2015, the main legal instrument through which the Municipality of Pogradec operates, the Law on Biodiversity Protection, No. No. 9587, dated 20.06.2006, amended by Law No. 37/2013 and Law No. 68, dated 03.04.2014, the Law on Protected Areas No. 81/2017, dated 04.05.2017, the legal basis for the establishment and management of protected areas and affecting the management of the Pogradec protected landscape, the Cultural Heritage Act, No. 9048 dated 07.04.2003 and amended by Law No. 9592, dated 27.07.2006, Law No.9882, dated 28.02.2008, Law No. 10137, dated 11.05.2009 and Law No. 77/2013, dated 14.02.2013 providing the legal basis for protection and management of cultural heritage, the Law on Territorial Planning and Development, No. 107/2014, dated 31.07.2014 (entered into force on 01.10.2014) providing the basis for all land use planning in Albania, the DCM on Territory planning regulation, No. 671, dated 29.07.2015, giving detailed information for the structure and the content of planning instruments at different levels, the Law on Water Resources, No. 8093, dated 21.03.1996, the Law on the Protection of Transboundary Lakes, No. 9103, dated 10.07.2003, the Law on Agriculture and Rural Development, No. 9817, dated 22.10.2007, the Law on the Mineral Sector, No. 10304, dated 15.07.2010, the Law on Environmental Protection, No. 10431, dated

09.06.2011, the Law on Fisheries, No. 64, dated 31.05.2012 and the Law on Tourism, No.93, dated 27.07.2015.

According to the state of conservation report submitted by both States Parties in February 2024, in order to improve the legal protection and strengthen the institutional capacities in North Macedonia, the Ministry of Culture in cooperation with the Ministry of Environment and Physical Planning, the Directorate for Environment and the Directorate for Protection of Cultural Heritage prepared a new Draft Law on the Management of the World Natural and Cultural Heritage of the Ohrid region, which is to be submitted to the Government following public hearings. In addition, a Draft Law on the Protection of Cultural Heritage and a Draft Law Declaring the Old City Core of Ohrid as Cultural Heritage of Particular Importance, have also been prepared but not yet implemented. A new Law on Fisheries and Aquaculture with a part on protected areas has been adopted and published (Official Gazette 64/2024), a draft law declaring the Studenčišča Marsh in Ohrid a Protected Area in category IV - Nature Park, submitted to the Assembly of the Republic of North Macedonia, awaits further action, and a draft law declaring Lake Ohrid a Monument of Nature is in the process of being adopted. A Law on Financial Support in Fisheries and Aquaculture is expected to be adopted by the end of 2024. In addition, modifications of the Law on Inland Navigation are planned in 2024, in order to control the registration, use/maintenance of speedboats and jet-skis, whereby measures that are more restrictive will be proposed regarding the registration of watercrafts, especially in relation to the limit of their date of manufacture.

General Local Plan for Pogradec Municipality (Albania)

The General Local Plan of the Municipality of Pogradec elaborated throughout 2016 and submitted as an annex to the 2020 state of conservation report was approved by Decision of National Council of Territory, No. 5, on 27 July 2022 and entered into force on 15 February 2023. Consequently, the Municipality of Pogradec can only grant developing, or construction permissions based on the General Local Plan. The January 2020 RMM analysed the General Local Plan and formulated several conclusions that can be found on pages 27 to 32 of the 2020 RMM report. For updated analysis and recommendations please see in the present report chapter 1.1.5 'Removal of planned development possibility along Lin lakeshore and peninsula (planning zones PG/HU63 and PG/HU70) and along the lakeshore between Pogradec and Tushemisht (PG/BU111). For an analysis and recommendations on Urban planning, please see in the present report chapter 1.2.2 'Urban plans - Legal and illegal constructions, platforms and equipment'.

Management arrangements at national levels

Since 2020, several management arrangements and documents have been put in place by both States Parties in an effort to strengthen the management of the property and its buffer zone. However, it is important to note that an effective overall management plan is a clearly overdue long-term requirement.

As stated in the property's Statement of Outstanding Universal Value (SOUV): 'In North Macedonia, the Management Plan for the Natural and Cultural Heritage of the Ohrid Region (2020-2029) was approved by the Government of the Republic of North Macedonia in January 2020 (Official Gazette of RNM No.45/20). It is legally binding and supersedes all laws in the State Party. In North Macedonia, the property is managed by two ministries (the Ministry of Culture and the Ministry of Environment) via three municipalities (Ohrid, Struga and Debrca), although the municipalities legally do not have the authority to protect cultural and natural heritage. The Institute for the Protection of Monuments of Culture and Museums in Ohrid has the authority to protect cultural heritage, and the Natural History Museum in Struga is responsible for protecting movable heritage. The Galichica National Park is authorized to manage natural heritage within the park as a whole, and part of the cultural heritage located within the territory of the Park. The Institute for Hydrobiology in Ohrid is responsible for the continuous monitoring of the Lake Ohrid ecosystem, the research and care for Lake Ohrid's flora and fauna, as well as the management of the fish hatchery, in order to enrich the Lake's fish stocks'.

The Law on Managing the World Cultural and Natural Heritage of the Ohrid Region No.75/2010 established the creation of a Commission for the management of the property, a multidisciplinary mechanism of coordinated management functioning under the administrative and financial support of the Ministry of Culture. Since its establishment in 2018, the Commission has been actively working on harmonizing the entire urban planning documentation of the Municipalities of Ohrid, Struga and Debarca in the Republic of North Macedonia with the provisions of the Management Plan. The Commission has played a crucial role in establishing a controlled urban planning regime in the Debarca, Ohrid and Struga municipalities and has focused on the proper implementation of the protection regimes and measures outlined in the Management Plan aiming at respecting established good practices, preservation of the landscape and contributing to the preservation of the property's OUV. The Commission gives its opinion on urban planning projects that must be integrated within the urban plans. The timeframe for providing such an opinion is 15 days. Failure to formulate an opinion within this timeframe means that the Commission has no comments and accepts the proposal as proposed. Therefore, the property may be adversely affected during periods when the Commission is unable to comply with the protection regimes and measures set out in the management plan.

The Management Plan for Galichica National Park (2021-2030) was formally adopted by all relevant state authorities in September 2021. The Galichica National Park Environmental Education Strategy (2021-2025) and the National Park Galichica Sustainable Tourism Development Strategy (2021-2025) form an integral part of the Plan. In September 2021, the Study for the Valorisation of the Lake Ohrid was adopted by the Council of the Ohrid Municipality. As part of the ongoing process to proclaim the Studenčišča Marsh as a protected area, North Macedonia issued a Decision for the Temporary Protection of the Marsh in July 2021. A draft Management Plan for Lake Ohrid Monument of Nature (2022-2031) was prepared in 2023.

In Albania, the management plan for the PPL is of high-quality, and a Protective Landscape Management Plan was developed in 2014, with the objectives to strengthen management, increase habitat protection and conservation, develop touristic and recreational use, and encourage the development of sustainable agriculture and socio-economic activities. This includes a five-year Action Plan (2014-2019) that aims to start remedial measures through strengthening management and cooperation and improving the legal framework. The Plan proposes to exclude the urban areas and the areas where intensive agricultural practices take place around the towns of Pogradec and Buçimas from the zoning of the protected landscape. A World Heritage Supplement (2017-2027) has been added to this management plan, setting out systems to strengthen the management of the property and its buffer zone. This supplement covers both cultural and natural heritage in terms of threats and necessary actions. These plans need to be effectively implemented and updated regularly. Deficiencies have been noted in the general implementation of urban and protected area planning regulations and plans in both States Parties, which need to be addressed in full.

In the Albanian part of the property, as established by Law 27/2018 'On Cultural Heritage and Museums', the Regional Directorate for Cultural Heritage (RDCH) of Korçë, a specialised deconcentrated State institution under the Ministry responsible for cultural heritage, is responsible for the implementation of the 1972 World Heritage Convention at the regional level. The National Institute of Cultural Heritage (NICH), a specialised State institution, also under the Ministry of Economy, Culture and Innovation, coordinates the implementation of the 1972 Convention at the national level. The safeguarding and preservation of the cultural components of the property in Albania, which include the design, implementation, supervision and commissioning of works is undertaken by entities licensed for these services, or by specialised State institutions, namely the National Institute of Cultural Heritage and Korça RDCH and regulated by Decisions of the Council of Ministers. For all interventions proposed to be implemented in areas of national heritage importance, the proposals must be authorized by the National Council of Material Cultural Heritage (NCMCH) following which the permit is granted according to the legislation in force for territorial planning and development.

For the natural component of the property in Albania, the Administration of Protected Areas Korçë (RAPA Korçë), a deconcentrated office of the National Agency of Protected Areas, administers the PPL and exercises its activity, which lies in the protected area of the Protected Terrestrial/Water

Landscape “Pogradec Lake”. According to the law, landscape permits must be sought from the National Cultural Heritage Institute for all interventions in areas protected for their landscape values. For the property and buffer zone, prior approval of proposed interventions from the Ministry of Tourism and Environment and Ministry of Culture is obligatory.

The Municipality of Pogradec is responsible for the management of the area covered by the GLP, which must respect the provisions and zoning of the Management Plan for the PPL and the principles and recommendations of the World Heritage Supplement to the Management Plan.

Transboundary management arrangements

The States Parties have signed several agreements for management and protection of the Lake, for instance the 2003 Law on Protection of Transboundary Lakes. The system of shared management of the property is regulated under the Law on ratification of the Agreement between the Government of the Republic of Macedonia and the Council of Ministers of the Republic of Albania on the Protection and Sustainable Development of the Lake Ohrid and its Basin (Official Gazette of the Republic of Macedonia No.46/05 – 99th session, 10.06.2005). Following the expansion of the boundaries of the property pursuant to the World Heritage Committee Decision 43 COM 8B.9 (Baku, Azerbaijan, 2019), the Republics of North Macedonia and Albania agreed to establish a Joint Committee for Shared Management of the Natural and Cultural Heritage of the Ohrid Region that was set up that same year. During 2020, in the midst of the health pandemic, two meetings between the States Parties were held. There is a potential and a need to raise the membership of the Joint Committee to a higher, executive, political level to ensure timely and effective decision-making and implementation. Links with the implementation of the Action Plan as proposed in the Strategic Recovery Plan should be further explored, developed and strengthened.

In December 2020, the Ministry of Agriculture, Forestry and Water Economy of the Republic of North Macedonia and the Republic of Albania signed an agreement for joint sustainable management of fish in the watersheds of Lake Ohrid and Lake Prespa, which envisages cooperation in the sustainable use and protection of the fish stock, harmonization of management in fishery and information exchange. According to the Agreement, a Fishery Committee was formed, with representatives from the two States Parties. It meets once a year and issues recommendations contributing to the harmonized management and measures for protection and sustainable fishery in regard to the fish stock in Lake Ohrid. In 2023, the Joint Fisheries Committee organized its second meeting and discussed the harmonization of the legislation and fisheries management.

Other international treaties and programmes under which the property is recognised

- The Ohrid region is part of the Ohrid-Prespa transboundary Biosphere Reserve since 2014 (Republic of Albania and Republic of North Macedonia);
- Lake Ohrid and Studenčišča Marsh is a Ramsar site (file no. 2449) since 2021, with a territory of 25,505 ha, situated within the framework of the World Heritage property;
- Lake Ohrid and Galichica National Park is a candidate Emerald Network sites under the Convention on the Conservation of European Wildlife and Natural Habitats of the Council of Europe.

III. THE MISSION

At its extended 45th session, the World Heritage Committee requested the States Parties to invite, as a matter of urgency, a joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission to the property ‘Natural and Cultural Heritage of the Ohrid region’ in order to examine the effective implementation of the immediate emergency measures, the level of mobilisation and coordination of all the stakeholders involved as well as the implementation of the recommendations of the 2020 mission and the repeated requests of the Committee, and to assess the overall state of conservation

of the property (paragraph 14 of Decision **45 COM 7B.104**). The governments of Albania and North Macedonia invited the World Heritage Centre, ICOMOS and IUCN to a joint mission to the property, which took place from 25 March to 29 March 2024.

The mission's Terms of Reference were based on the latest Committee Decision (see Annex I for the full text). The mission was organized by the States Parties of Albania and North Macedonia separately. The mission had two separate programmes and none of the representatives of one State Party was present in the part of the mission that was taking place in the other State Party. The mission arrived in Tirana, Albania on Sunday 24 March. On 25 March, the mission began in Tirana, meeting the vice-Minister, high officials and senior representatives of the Ministry of Tourism and Environment of the Republic of Albania, representatives of the National Agency of Protected Areas in Albania, as well as representatives of the Albanian American Development Foundation and an expert from the University of Tirana. Then the mission met with the Minister and Vice-Minister of Economy, Culture and Innovation, high officials and senior representatives of the Ministry and the General-Director and senior representatives of the National Institute of Cultural Heritage as well as the Director of the National Commission for UNESCO. In the afternoon, the mission travelled to Pogradec by car and was accompanied by the Director and representatives of the Regional of the Regional administration of Protected areas in Korça, the Director and representatives of the Regional Directorate of Cultural Heritage in Korça, the Director and representatives of the Directorate of Cultural Development Programs of the Ministry of Economy, Culture and Innovation, a Director of the National Institute of Cultural Heritage and representatives of the Municipality of Pogradec. The mission visited the Lin peninsula and the ruins of the Early Christian Church and its Mosaics. It then visited the area of the prehistoric settlement of pile dwelling near Lin discovered in 2023. On 26 March, the mission experts visited the Historic Centre of Pogradec. They then had a meeting with the Mayor of Pogradec, the Prefect of Korça, representatives of the Municipality and regional institutions and continued with a meeting with the civil society and representatives of the local community. The mission then visited Pogradec Castle and spent the afternoon visiting the Drilon Springs and receiving a presentation from AADF representatives on the Drilon Park and Waterscape project. At the end of the day, the mission met with local artists in Pogradec.

On 27 March, the mission experts visited briefly the Tushemisht village before crossing the border to North Macedonia. The mission team met with the coordination team of North Macedonia on the border crossing and firstly visited the site of Saint Naum. They also met and had meetings with the Director and representatives of the Galičica National Park, the Director of the PSI Hydrobiological Institute. They then had an on-site visit to the Studenčišča Marsh and afterwards met with the Director a.i. of the PE Kolektorski Sistem. In the afternoon, the mission experts had a meeting with the Mayor of the Municipality of Ohrid and representatives of the Municipality and then had a meeting with civil society. On 28 March, the mission experts met with the Mayor of the Municipality of Struga and representatives of the Municipality. They then had an on-site visit to the area that is projected to develop the Railway Corridor VIII and visited Radozhda and its surroundings. They then met with the Minister of Culture, the Director of the Directorate for the Protection of Cultural Heritage and the Director of the NI Institute for the Protection of Monuments of Culture and Museum. In the afternoon they visited the old city centre of Ohrid up until the castle. The team also visited archaeological excavations recently discovered in the old city of Ohrid.

On 29 March, the mission experts travelled by car to Skopje and met with the Minister of Environment and Physical Planning and representatives, and with the Minister of Transport and Communications and representatives of the Ministry, including the Director of PE Railway Infrastructure and the Director of PE State Roads. Finally, the mission experts had a meeting and presentation with the expert team drafting the Strategic Recovery Plan. The mission left Skopje on Saturday 30 March.

The mission did not have sufficient time to visit the church of Saint Sophia and religious architecture in the old city of Ohrid, the Sateska river and the area of its re-routing, nor areas of dumpsites. Both meetings with the civil society were also attended by the local authorities in the Republic of Albania and by the national authorities in the Republic of North Macedonia.

Please refer to Annex III for the mission's programme and to Annex II for the composition of the mission team.

IV. ASSESSMENT OF THE STATE OF CONSERVATION OF THE PROPERTY

Issue 1: Review the progress made in implementing the recommendations of the 2020 Reactive Monitoring mission and previous decisions of the Committee and examine the development and effective implementation of immediate emergency measures designed to stop new threats and reverse existing ones

1.1 Development and effective implementation of immediate emergency measures designed to stop new threats and reverse existing ones

1.1.1 Emergency measures identified by the States Parties

The Government of North Macedonia adopted on 26 September 2023 a decision concerning urgent measures (18 in total) to be undertaken to improve the situation of the property. These measures include the preparation of a priority list of the most important habitats and the status of species in the Ohrid Lake region, guidelines for limiting the construction of new buildings, superstructures and extensions in the Old City of Ohrid, the preparation of a list of protected buildings and areas where inappropriate installations have been built and another priority list for the removal of such installations, an analysis of the vessels in Lake Ohrid and a study of the carrying capacity of the Lake in relation to a number of vessels, the preparation of a law amending and supplementing the law on the proclamation of the Old City of Ohrid as Cultural Heritage, the preparation of guidelines for owners of monuments on the obligations arising from the legislation, the obligation to remove illegal buildings for which the procedure has been completed and the means of demolition have been secured, and to remove structures that encroach into Lake Ohrid or into its protective belt of 50 m, in the locality of St. Naum and Studentishta March, the prevention of further construction within the Ramsar site of Lake Ohrid, the establishment of a coordinating body to harmonise the routes of infrastructure, the obligation to prepare HIAs for all newly designed routes, the establishment of a special budget for the implementation of measures and activities for the protection of the World Heritage property, among others.

The mission was informed that an amendment to the law on the Protection of Ohrid has been drafted, and guidelines for monuments' owners have been prepared; however, regarding a number of other urgent measures, e.g., the demolition of structures encroaching upon the Lake or in its coastal 50m belt, no advancement could be recorded, i.e., in Radozhda concrete structures still exist or are under construction, and, in Ohrid, along the promenade built in front of Studentishta Marsh, at least two structures are standing and a new one was under construction during the mission.

Whilst there has been no governmental decision regarding the implementation of immediate emergency measures to revert and prevent further degradation, the State Party of Albania informed the mission that it is now compulsory that a Heritage Impact Assessment accompanies any large-scale project submitted to the National Council of Material Cultural Heritage; regular cleaning of the shore and city rivers is performed; the rivers of the villages Remenj and Cerrave have been respectively completely and partially rehabilitated; no urban waste is deposited at the Peshkepi dumpsite. A special task force is in place in Pogradec to monitor the situation of the rivers and prevent pollution. Other measures on sewage and planning systems are reported in the relevant paragraph below. Pogradec Municipality informed the mission that no advancement could be reported on the removal of waste at the mining dump site near Mëmëlisht Village (the Former Train Station) since 2022. About 370,000 tons of waste were removed but 30,000 tons remain to be removed. No work was done for five years due to the Covid-19 pandemic, price rises and the closure of the factory; it will resume when the factory reopens. The subject was granted a 20-year concession ending in 2025. The mission was unable to visit the above sites due to time constraints, but the Municipality of Pogradec kindly provided photographs of the main dumpsites.

In relation to cleaning the informal dumpsite in Peshkepi, the mission was informed that the Maliq landfill has been completed and is operational; therefore, it should be possible to proceed with the removal of the waste accumulated at the site. Pogradec Municipality kindly shared photographs of the works being carried out at this dumpsite to tidy it up.

Excavators have been used to remove part of the garbage accumulated there and stabilize the soil and the slope. The images dated 10 May 2024, however, suggest that only a fraction of the waste was removed and much still remains onsite.

The mission observes that the measures implemented in Albania are important for the maintenance of the property, but most of them cannot be seen as an emergency response to ongoing and new threats. It would be beneficial if the State Party of Albania could, through governmental decision, approve and thus raise the status of the Strategic Recovery Plan, strengthen the governance for its implementation in Albania, and mandate the responsible implementing agencies to undertake the prompt implementation of emergency measures that include at least the following: the prompt revision of the provisions for development of the General Urban Plan for Pogradec as already recommended by the 2020 Reactive Monitoring Mission; and the removal of the plan for a Museum on top of the hill near Drilon Springs or any other building or facility from the Masterplan for Drilon Park as well as the reduction of development possibilities as already recommended by the 2020 Reactive Monitoring Mission.

The work carried out at the Peshkepi dumpsite cannot be considered to comply with the recommendation of the 2020 RMM and the World Heritage Committee on this matter.

Concerning progress at the Peshkepi dumpsite, the mission considers that the complete removal of accumulated waste at the Peshkepi site, and any other uncontrolled dumpsites is essential and urgent to stop potential sources of pollution of aquifers. In this regard, the mission recommends that a plan for the complete removal of waste and environmental rehabilitation of the Peshkepi informal landfill be urgently prepared in cooperation with the waste management authority, which currently manages the Maliq landfill.

The mission further considers that a detailed systematic update of the progress being made in the Republic of North Macedonia in implementing the emergency measures established in September 2023 is necessary.

The 2020 RMM provided a list of urgent actions to be taken immediately to halt degradation and address potential new threats. States Parties have not used the detailed table provided in the 2020 RMM report to update progress on the recommendations. It is recommended that States Parties use the table reproduced at the end of this report to provide an update on progress in meeting the recommendations.

1.1.2 Review and analysis of the various infrastructure and tourism development projects planned and implemented in the property and its buffer zone

➤ The railway corridor VIII and highway A2

The route of the EU corridor VIII has been the object of World Heritage Committee decisions since 2017, when the Committee requested the State Party of North Macedonia “to urgently undertake a comprehensive comparative study of alternative routes for the railway of the Pan European Corridor VIII, including those that do not pass in close vicinity of the lakeshore, and in particular avoiding one of the last well-preserved stretches of the lakeshore on the Albanian-[North] Macedonian border”. Since then, references to the issues raised by the route of Corridor VIII have been made in Committee Decisions in 2019 and 2021 and in the report of the January 2020 Reactive Monitoring Mission. In October 2021, the States Parties of North Macedonia, Albania and Bulgaria signed an agreement reiterating “the will and readiness of the parties for long-term infrastructure planning and coordinated development of Corridor VIII”. The 2021 agreement that sets the conditions of cooperation between North Macedonia and Albania in the implementation of the Corridor VIII are based on the premises that the railway connecting the two States Parties will cross the border between them along the Lake Ohrid coast, near Lin.

The States Parties’ State of Conservation report informs that in 2022, the European Commission adopted a decision concerning the whole Corridor VIII, including the Kichevo Lin section, which now meets the prerequisite for being funded. The European Investment Bank (EIB) and the European

Bank for Reconstruction and Development (EBRD) expressed interests in funding its construction. A new Feasibility Study is reported to be prepared for an alternative route for the Section Struga-Albanian Border. The Railway Enterprise of North Macedonia informed that "There is on-going procedure for approval of WBIF grant for technical assistance, supported by EIB as the lead International Financial Institutions (IFI). The objective of the grant is to provide pre-feasibility study and related documentation from Struga to the connection point to the railway network in the Republic of Albania. The Terms of Reference (ToR) for this assignment will be additionally developed after approval of the WBIF grant." The mission notes that it is not clear whether the scope of work for the Feasibility Study envisages studying an alternative route that excludes the coastal stretch of the Lake between Kalishta (in North Macedonia) and Lin (in Albania). Although, the Public Enterprise for Railway Infrastructure informed that two meetings were held with their counterpart in Albania and it was decided to apply for a grant to explore whether the same route for the railway will be confirmed or an alternative will be pursued, during a meeting with the mission, the Ministry of Transport of the Republic of North Macedonia verbally assured the mission that the route of the railway between Struga and the Albanian border will be changed to avoid the Lake's coastal zone and will cross the North Macedonian – Albanian border inland. However, no written confirmation has been received on the matter at the time this report was prepared. Between the time of the mission and the finalisation of the report, there were legislative elections in North Macedonia resulting in ministerial changes.

A letter dated 16 February 2024 from the Albanian Railway Company to the Permanent Delegation of the Republic of Albania to UNESCO and to different institutions of the former Ministry of Culture informed about the intention of rehabilitating the existing, deteriorated railway line between Rogozhine to Pogradec (the Station stands outside Pogradec along the coastline) and reconfirms the agreement with North Macedonia for cross-border railway crossing at Lin. The letter further informs that the study of the project of "the railway line Rogozhine - Pogradec is in the Preliminary Design phase and will continue with the Detail Design phase". The mission notes that the documentation of the preliminary phase of the rehabilitation project of the railway in the stretch between the tunnel under Qafe Thane, Lin and Pogradec was not received by the mission and recommends that both the project documentation and the EIA report or any scoping study so far prepared to be shared with the World Heritage Centre. The mission also underlines that a HIA study based on the Guidance and Toolkit for Heritage Impact Assessment in the World heritage context is necessary for the rehabilitation project covering the section between the tunnel under Qafe Thane up to Pogradec and for any further section from Pogradec further south in Albania, if this is envisaged. Previous Reactive Monitoring Mission reports (2017 and 2020) have already highlighted the threats posed by the realisation of this infrastructure. The mission observes that, notwithstanding the recommendations of the World Heritage Committee about the need to modify the route of the corridor in correspondence with the North Macedonian–Albanian Border to avoid the disruption of one of the last intact stretches of Lake Ohrid's coast, North Macedonia and Albania reaffirmed formally their commitment to build and finalise the transport infrastructure connecting their countries through the initially agreed route, along the Lake Ohrid within the World Heritage Property. A copy of this agreement was received in 2024 following the Reactive Monitoring Mission.

Despite verbal assurances received by the Republic of North Macedonia on the willingness to meet the recommendations by the World Heritage Committee, the situation regarding the future route of railway Corridor VIII remains unclear, and, with the accession to funds being approved, the potential threat posed by the infrastructure comes closer.

Only if the State Parties of North Macedonia and Albania formally confirm their commitment to define an alternative route that moves the railway away from the coastline in the stretch from Struga until the Albanian Border and excludes Lin as border-crossing point, the threats posed by this infrastructure to the OUV, integrity and authenticity of the property will be avoided. The section Kichevo-Trebenishta of Highway A2 is under construction. Due to time limitations, the mission could not visit the construction site. However, the mission understood that several access and service roads are necessary to construct the Highway. The mission recommends that the project documentation with the additional interchanges be promptly shared with the World Heritage Centre for comments by the Advisory Bodies.

The Mission notes that the highway passes through an almost undeveloped rural plain; therefore, it recommends that the construction of interchanges be kept to a minimum to avoid further erosion of the rural character of the plain, which is within the World Heritage property and contributes to the understanding of the formation of Lake Ohrid and its OUV as a superlative natural phenomenon.

The mission visited the location along the route of the subsequent section – Trebenishta Kafatan – of A2 near Frangovo, where pre-feasibility explorations have been made for changing the route of highway A2 to connect with the Albanian Border. The Public Enterprise for State Roads has signed a contract with a construction company to build this section. In this framework, the Enterprise has explored options for modifying the route of highway A2 away from the Lake's coastal zone and has identified a potentially viable option in opening a tunnel near the village of Frangovo and cross the North Macedonian-Albanian border in a tunnel exiting in Albania presumably between Skenderbej and Shpella (observation of the mission based on the map shared by the State Enterprise).



Figure 2 Approved route of A2 indicated on page 3 of Document nr 14-4970/1 dated 25 April 2024 issued by the Public Enterprise for State Roads and addressed to the National Commission of UNESCO under the Ministry of Culture (source: State Enterprise for State Roads)

Following the mission, the State Enterprise for State Roads has shared two alternatives for the highway A2 section between Trebenishta and the North Macedonian–Albanian border. The first, as indicated in figure 2, is the planned route for which detailed design already exists and connects Trebenishta via Struga, Frangovo, Elen Kamen, Mali Vlah, Kafatan. This route almost doubles the existing road through Kafatan but does not coincide with it.

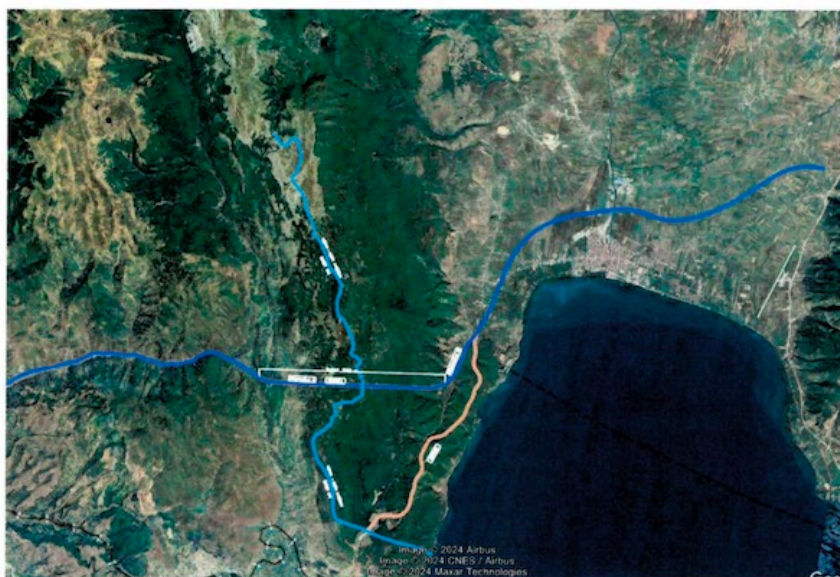


Figure 3 In dark blue, alternative route of A2 to cross the North-Macedonian–Albanian border indicated on page 4 of Document nr 14-4970/1 dated 25 April 2024 issued by the Public Enterprise for State Roads and addressed to the National Commission of UNESCO under the Ministry of Culture (source: State Enterprise for State Roads)

The other option, as indicated in Figure 3, envisages that the section of the road will be built up to Frangovo, where the route can turn to the right and enter a tunnel slightly north of Frangovo connecting North Macedonia with Albania. The Public Enterprise and road engineers working for the construction company envisage 5-6 years to conclude the construction of the tunnel. Meanwhile, the traffic will pass through the existing 3-lane road that has been rehabilitated. It is expected that the tunnel can serve both the road and the railway.

The mission considers the option through the tunnel preferable as it avoids the passage and multiplication of transport infrastructure between the actual road connecting Kafatan, Frangovo and Struga and the lakeshore, in one of the last almost intact stretches of Lake Ohrid. The mission notes, however, that at this stage there exists no study of the feasibility of an alternative to the current route either for the railway or the road of the European Corridor VIII. The Mission considers it urgent that such a study be undertaken and that the World Heritage Centre be kept regularly informed of progress in this direction. The mission also considers it urgent that Environmental and Heritage Impact Assessments (EIA and HIA) be carried out in accordance with the *Guidance and Toolkit for Impact Assessments in a World Heritage Context* to assess the potential impacts of all stretches of the project and submitted to the World Heritage Centre before any final decision is taken.

The World Heritage Centre needs to be provided with a map showing the service roads for the construction of the A2. Such a map must also indicate which roads will be removed after the work is complete and which are to become permanent roads. It is also necessary to provide a map showing all planned and additional proposed interchanges to connect the highway with local roads and settlements.

- *Removal of the service road near Pogradec and landscaping of the tunnel and cut in the cliff at the entrance of Pogradec (Albania)*

The 2020 Reactive Monitoring mission recommended the removal of the service road that was built to facilitate the construction of the new highway and the open tunnel. The municipality has provided photographs attesting to the implementation of this recommendation; however, it is regrettable that instead of removing the dirt road and the accumulation of stones and gravel dumped into the Lake and restoring the area as it was before the construction of the new road, it was decided to encroach further into the Lake with a hard reinforced concrete structure and to build an extension to the cycle

path. In addition, nothing has been done to mitigate the negative impact of the cut in the cliff made to widen the road, as recommended by the 2020 Reactive monitoring mission.

Since this intervention and the construction of the open tunnel are considerable in size and very visible from many parts of the Lake, even across the Albanian border, in North Macedonia, they have an extremely negative visual impact, which must be mitigated as soon as possible. Such a hard intervention also represents a rather unsuccessful “calling card” for the city of Pogradec, that the municipality and all relevant stakeholders should have interest to redress.



Photo 1 The visibility of the open tunnel and of the cut into the cliff from Pogradec promenade

The Mission recommends that a comprehensive project to rehabilitate and stabilise the cliff and to mitigate the negative visual impact of the cut and tunnel be commissioned as a matter of urgency. The project proposal should be submitted to the World Heritage Centre for review by the Advisory Bodies.

1.1.3 Removal of the possibility of creating a Marina and leisure area at Studenčišča Marsh (North Macedonia)

The mission visited the canal near the Studenčišča Marsh and found that no new development was taking place at the time; the banks of the canal were under repair. However, the plan for developing a marina does not seem to have been definitively cancelled, although alternative locations for this development are currently explored.

Possibly related to this project is the idea of the Municipality of Ohrid to rehabilitate and upgrade the pier along the Macedonia Quay (see photos below).

The mission recommends that before any decision is taken about alternative locations for building a marina, or a touristic port, information and documentation is shared with the World Heritage Centre for review by the Advisory Bodies, in compliance with paragraph 172 of the Operational Guidelines.



Photo 2 View of the pier from it towards the town

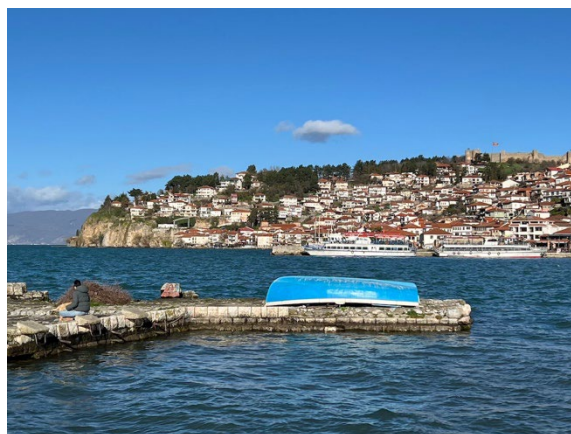


Photo 3 View of the current condition of the pier

1.1.4 Removal of fish-farms and finalisation of the demolition of terraces and structures encroaching into Lake Ohrid

In Albania, the mission could ascertain that, within the project for the creation of the Drilon-Tushemisht Waterscape Park, the existing informal fish farms in Drilon area and Tushemisht village have been dismantled and activity has ceased. According to additional information received from the State Party after the mission, no commercial fish farming is allowed in Lake Ohrid in Albania.



Photo 4 Partially dismantled fish farms

In North Macedonia, the State Party reports that there is no illegal fish farming in the Lake Ohrid area. No fish farm is registered within the waters of Lake Ohrid; only the hatchery and breeding facilities of the PSI Hydrobiological institute – Ohrid (HBI) are operational in Lake Ohrid. In the Lake Ohrid basin, two small scale fish farms are registered and produce native fish species; in the Crn Drim River basin, 12 fish farms are registered, producing both native and allochthonous species. Most of the aquaculture facilities produce less than 20t fish. None of these were visited by the mission, due to time constraints.

Regarding tourism-related platforms and semi-permanent structures encroaching upon the Lake, in Albania a number of them were removed already in 2020. A few are still in place and would need to be monitored to prevent their extension or increase in number. Additional post-mission information clarifies that since 2022 there has been no need for removal intervention. The regulations permit the installation of temporary structures on the beach between 15 May and 30 September each year, after that date, the temporary structures must be removed by the proponent. However, some are permanent and are not removed seasonally.



Photo 5 Permanent structure in Lake Ohrid, Pogradec (Albania)

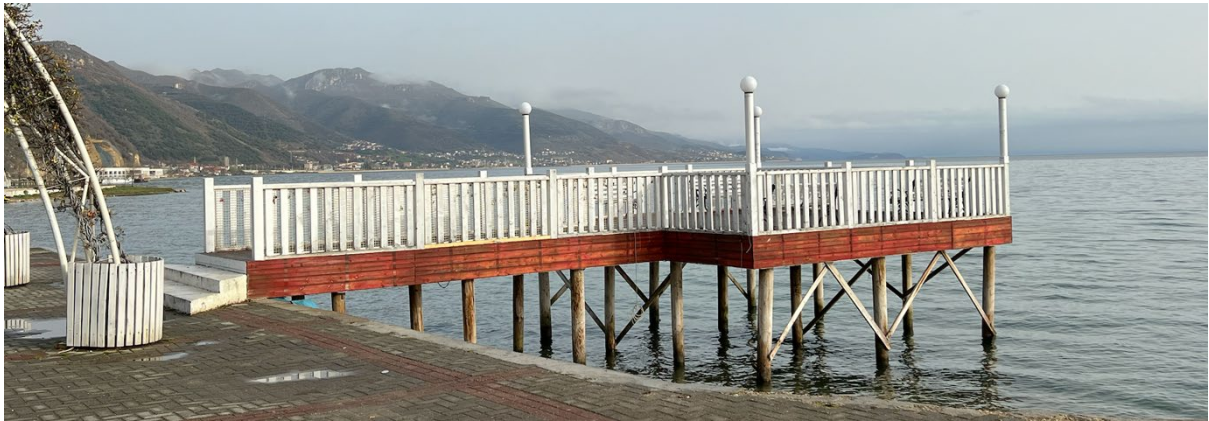


Photo 6 Permanent structure in Lake Ohrid, Pogradec (Albania)

In North Macedonia, the situation is variable (see photos below). The removal of the terraces and their supporting structures built in the Lake in the Old Town of Ohrid has not been completed; in some cases, only the pavements have been removed but the supporting pillars and beams are still in place. The mission notes that this recommendation could have been already fulfilled by the responsible entities, as the first steps had already been undertaken in 2020, so it is unclear why they could not be completed in a timely manner.



Photo 7 Platforms encroaching the Lake in Ohrid (Republic of North Macedonia). In the background platform partially removed.



Photo 8 Structures of platforms only partially removed (Ohrid)



Photo 9 Platform in concrete (fore front), with extension in metal and timber (Ohrid)



Photo 10 Permanent platform in concrete (Ohrid)



Photo 11 Platform in concrete near Kalishta



Photo 12 Metal-frame platforms in Radozhda



Photo 13 Platforms in concrete near Kalishta



Photo 14 Metal-frame platforms in Radozhda

The mayor of Stuga informed the mission that 18 structures were identified as illegal and demolished, in Radozhda, and that there were still a few platforms (these are illustrated in Photo 12 and Photo 14.).

The mission could verify that one of the emergency measures identified by the 2020 RMM necessary for the improvement of the state of conservation of Lake Ohrid, namely the removal of illegal fish farms, which were a serious issue particularly in the side of the Lake in Albania, had been implemented.

Regarding the removal of platforms and equipment of tourism facilities along the lakeshore, the mission reiterates the recommendation of the 2020 RMM to immediately remove all elements of these structures that still await dismantling and to remove those illegally built that have not been dismantled yet.

1.1.5 Removal of planned development possibility along the Lin lakeshore and peninsula (planning zones PG/HU63 and PG/HU70) and along the lakeshore between Pogradec and Tushemisht (PG/BU111)

The January 2020 RMM analysed the General Local Plan for Pogradec Municipality and concluded that, according to paragraphs 179 and 180 of the Operational Guidelines, some of the planning provisions represented potential dangers to the OUV of the property and should, therefore, be removed. In particular, the mission recommended the change of planning provisions for the planning zones PG/HU63 and PG/HU70 in Lin Peninsula and along the lakeshore between Pogradec and Tushemisht (PG/BU111).

The rationale for these recommendations was based on the recognised need to preserve, where it still exists, the connectivity between the natural system of the Lake, its shores, the plains and the piedmont.



Figure 4 Aerial view (Google Earth) of the Pogradec plain. The area highlighted in light blue is mostly rural and preserves a good part of landscape connectivity between the hills foot and the lakeshore. This connectivity should be preserved by avoiding urbanisation.

The above-mentioned zones are still indicated as urban areas in the approved plan, although the numbering has changed and, due to the visualisation of the planning documentation⁴ as, the current valid numbering cannot be identified with certainty.

⁴ Accessible at <https://planifikimi.gov.al/index.php?id=732&L=2>.



Figure 5 Extract from the approved General Local Plan for the Municipality of Pogradec. Lin (document named "2.Harta_e_sistemeve_territoriale_te_propozuara"). The colour code of the GLP for Pogradec indicates in red the urban system (including areas that are currently not developed as urban areas, but are either agricultural or natural), in green the natural system, in light yellow the agricultural system).

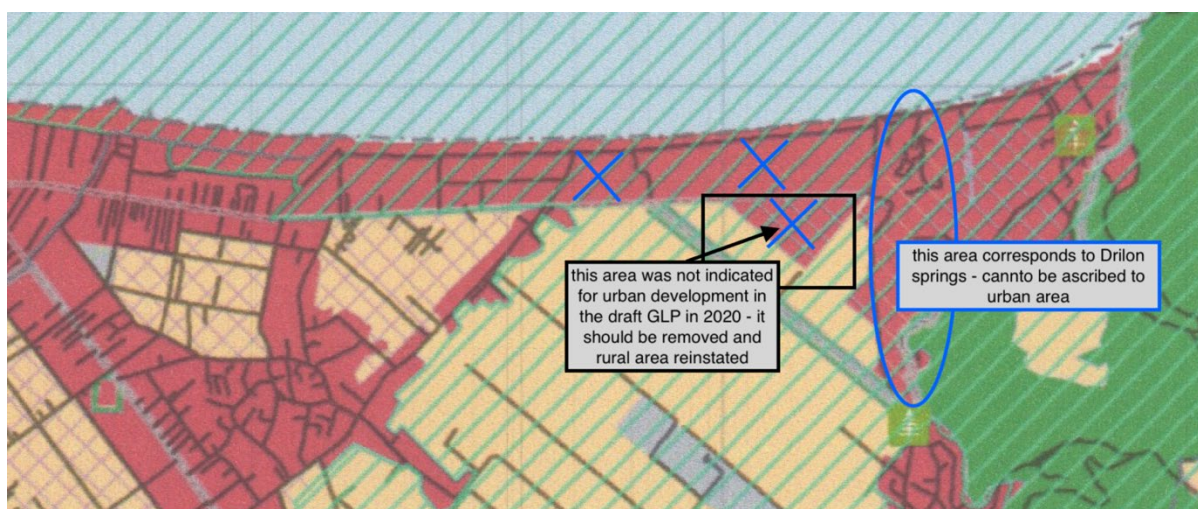


Figure 6 Excerpt of the approved General Local Plan for Pogradec Municipality. Tushemisht (document named "2.Harta_e_sistemeve_territoriale_te_propozuara"). It is noted that the area corresponding to Drilon Springs is marked as urban area. It is also noted that, compared to the draft GPL examined in 2020, one additional large triangle-shaped zone is indicated as an urban zone, immediately south of the coastal strip. The areas indicated with blue line crosses should not be urbanised or turned into urban-related uses.

The 2024 state of conservation report prepared by the State Party reports that the General Local Plan envisages that all Detailed Plans for Areas of National Importance (in Albanian, the acronym is PDZRK) must be first sent to the World Heritage Centre for preliminary review, and this decision extends to the areas of Lin – Pogradec and Pogradec – Tushemisht. However, it is not fully clear which planning zones are earmarked for PDZRK and, therefore, those to which this obligation applies. Furthermore, the additional zone attributed to the urban system south of the coastal strip, which was not included in the 2020 draft, should also be changed back to a rural area/ system; a different location further away from the Lake should be identified for the functions envisaged for this area. The mission understands that any plan of national importance that might be developed for these areas, it must be submitted in advance to the World Heritage Centre for review by the Advisory Bodies.

The mission however does not consider that the threats posed by the above-indicated specific planning provisions are effectively removed if the GPL is not amended and the possibility for such developments to happen remains legally valid. **The mission reiterates the recommendations already made by the January 2020 mission that in the areas visually marked on the planning documentation (see Figure 5 and Figure 6), the possibility of urban development should be excluded from the planning documents via an amendment of the GLP zoning and respective regulations.**

It is indispensable that the planning provisions discussed above be amended to exclude the possibility of urban development in those zones, as they are still underdeveloped and maintain a rural character, which supports the attributes of the OUV. In the absence of formal approval of such modifications, the threats identified in the 2020 RMM remain, as approved planning regulations provide a legal basis for such development to take place.

The World Heritage Committee's request in Decision 45COM 7B.104 to implement 'immediate emergency measures designed to stop new threats and reverse existing ones' cannot be considered fulfilled by the State Party of Albania regarding the specific threats posed by the above planning provisions until they are modified as recommended by the mission and an amendment to the General Local Plan of Pogradec Municipality is formally adopted by the relevant authority.

1.1.6 Drilon-Tushemisht Water Park Project: downsizing of activities and building possibilities in the tourism development project at Drilon Springs

The project envisages the rehabilitation of the Drilon Springs area. The feeder spring complex at Drilon is one of the "most important locations for the conservation of the endemic aquatic biodiversity" (Nomination dossier). The Drilon Springs is a vital ecosystem within the Ohrid region, renowned for its unparalleled conservation and biodiversity value. Fed primarily by the Tushemisht-Driloni springs, its significance extends to the preservation of endemic species and unique vegetation communities. The area's rich macrophytes and wet meadow vegetation, particularly in the Buqeza and Driloni zones, harbour a diverse array of hydrophilic and hydrophilic plant species. This botanical richness underscores the area's importance as a habitat and breeding ground for numerous endemic fauna and flora. Among its biodiversity treasures are the *Ostracoda* crustaceans, and number of rare and endemics species. Noteworthy among these are *Paralymnocythere ochridense* and *Candona hartmanni*, crucial for maintaining the ecological balance of the springs. However, the area faces threats from human interventions, including tourism development, accelerated aquaculture, agriculture expansion, and pollution, jeopardizing water quality and ecosystem health.

Furthermore, invasive species like rainbow trout and Chinese carp pose a significant challenge, potentially displacing native species like the Ohrid trout. Changes in zooplankton communities also indicate ecological disruptions, likely linked to rising water temperatures.

Drilon springs is an important karst area with several springs, which creates a very attractive area both from the point of view of geomorphology and biodiversity. It is a unique place that has no parallel in the entire Ohrid Lake. In recent years, Drilon springs have been significantly affected by human activities. Whether it was the activities of the original inhabitants who exploited the land in the immediate vicinity of the springs, or more recently, the massive and rapid development of tourism.

Despite these challenges, Drilon Springs remains a beacon of biodiversity, recognized through its designation as a Protected Area of Terrestrial/Aquatic territory. Efforts to mitigate threats and conserve its natural heritage are imperative to ensure the continued resilience and ecological integrity of this invaluable ecosystem within the Ohrid region.

Drilon Springs has progressively been encroached upon by illegal/informal fish farms, buildings and semi-permanent structures; public paths have been fenced off and privatised, and the area has deteriorated. The area closer to the lakeshore housed a recreation park which is very popular locally and among visitors but needs careful progressive re-naturalisation and its use to be better regulated.

The Drilon-Tushemisht Water Park project is complex and encompasses different actions: the rehabilitation of the Drilon urban park and its extension towards the inland with the elimination of the fish farms, the construction along the lakeshore of a visitor centre and a museum, the transformation of the current road into a promenade, the creation of four piers, the diversion of interurban traffic away from the lakeshore in accordance with Tushemisht, the creation of three car parks for visitors to Drilon Park along the inland watercourse flowing from the springs to the Lake, the technical installations such as sewerage system, lighting, water and power supply, the beautification of the springs on the outskirts of Gurras, the detailed planning of possible future urban development of Tushemisht with a proposed articulation, shape and volume of new buildings.

When the mission visited the site in March 2024, the Drilon-Tushemisht Water Park Project was under implementation, although active works could only be seen at the construction site of the visitor centre.

The mission visited the construction site of the Drilon-Tushemisht Water Park project and verified that the fish farm activity had been stopped and some facilities had been removed, although some of the structures remained in place, apparently due to the technical difficulties of removing them from wetlands. The recreational park is being enhanced and expanded. Park furniture is being upgraded and replaced with new structures, mostly in wood.



Photo 15 The repair of the watercourse banks with eco-friendly materials/techniques



Photo 16 The promenade from the Drilon Park to the springs

The mission notes that the part of the project relating to the rehabilitation of the recreational park is an improvement on the previous situation and that the techniques used to restore the banks of the watercourse formed by the springs appear to use environmentally friendly materials and solutions. The rationalisation of uses and the creation of a sewerage system, previously missing, will also improve the situation compared to the previous degraded conditions of the Drilon Springs. However, as explained above, the Drilon complex and the springs would need a different treatment: considering their importance for the overall lacustrine system and its function in sustaining biodiversity, this area should be dedicated to conservation and not tourism or recreation, so rather than rehabilitating the recreation facilities, they should be removed, and the area ecologically restored. Therefore, in the medium-term, the spring system at Drilon should be re-naturalised and recreation activity removed.

Due to the uniqueness of this area and the role that the Drilon Springs play in the hydrological processes that contribute to the oligotrophic conditions of the Lake, it is necessary to strictly protect it from any intervention that could disturb the fragile balance of this place. For example, riparian and native vegetation should be preserved, springs should be separated from nearby agricultural fields, and the nutrient load entering these important waters should be reduced. The number of visitors to

Drilon Springs affects the area by increasing habitat disturbance, contributing to pollution and potentially damaging the fragile ecosystem, which may threaten the biodiversity and ecological balance of the associated World Heritage property.

The project also includes creating parking spaces for visitors and provides a sort of detailed urban plan for urbanising the strip of land between the Drilon water stream and the village of Tushemisht. The January 2020 Reactive Monitoring Mission had already commented on the project and provided clear recommendations about how to reduce its potential impacts. These included the exclusion of the Water Museum on the hill overlooking the Drilon Wetlands, the reduction of the area where development is possible, and the exclusion of any structure near the parking lots planned along the western side of the project area.

The project as approved in December 2020, some 10 months after the mission, still includes the reference to a museum on top of the hill, the full high-density urbanisation of the area, still largely rural, between Tushemisht village, Drilon Park and the watercourse between Drilon and Tushemisht, the allocation to the urban system of zones near the parking lots west of Drilon, all recommended for removal by the January 2020 RMM. The project also plans the construction of a vehicular road (see Figure 7) all around the foot of the hill, in an area that is essentially rural and without vehicular access. The creation of vehicular accesses where they do not exist and are not needed for connection purposes only promotes the further urbanisation of an area which needs, on the contrary, to be preserved from urban development and be progressively returned to natural conditions.

Representatives of the AADF informed the mission that the project proposal does not envisage any construction in the area between Drilon and Tushemisht, but only aims to guide urbanisation if landowners intend to build anything. It is understood that the proposed articulation of the plan is not prescriptive and does not bind landowners or holders of building rights to follow the recommendations of the detailed plan; therefore, the proposal only defines this as a new urban area. Whilst AADF has clarified that the Water Museum will not be implemented, the 2024 state of conservation report by the States Parties explains that the Government of Albania will implement the interventions envisaged in the masterplan that are not assigned for implementation by AADF, including the Water Museum. The Municipality of Pogradec has stated in its additional information that they will not implement the Museum. However, the engagement to implement the museum has been taken by the Government of Albania, not the municipality; therefore, until the government of Albania formally communicates that they have cancelled the construction of the museum or any other building or infrastructure on the top of the hill near Drilon Springs, there is no certainty that this will not be built.

This mission reiterates the 2020 RMM recommendation to remove the Water Museum from the planned infrastructure and to avoid urbanisation of the area west of the village of Tushemisht, north of the watercourse between Tushemisht and Drilon, at the density currently proposed. Elsewhere, for example in the document entitled 'Signed_WATERFRONT DRAWS2.pdf', the AADF project suggests the possibility of a car park on the top of the hill: this idea should also be abandoned; the hill should remain undeveloped, given the karstic phenomena inside it. The mission also recommends that the structures and facilities installed for fish farming, which are still on the site, be removed as soon as possible.

The mission notes that the lakeshore redevelopment envisages four structures for boats. The proposal to build piers near the Drilon Springs outlet may disrupt the natural habitat, affecting water flow and harming aquatic species. Removing old structures, as recommended by the 2020 RMM, aimed at supporting the conservation of endemic species, maintaining ecological balance, and reducing pollution and sediment disturbance, ensuring cleaner water. Albania started promptly to fulfil this recommendation; however, this development proposal appears in contradiction with previous recommendations and course of action undertaken by Albania to redress negative impacts on the Lake. The mission considers that the current lakeshore redevelopment, with four boat piers in a short stretch of shoreline, is excessive and should be reduced to protect the ecological integrity of Drilon Springs, as the construction of multiple piers may increase their negative impact on the Lake, disrupting natural habitats, harming aquatic species, and contradicting previous conservation efforts aimed at maintaining ecological balance, reducing pollution, and preventing sediment disturbance, impacts that are already visible with the existing piers.

The mission considers that only small light piers for unmotorised boats might be considered, if eco-friendly solutions for the piers can be found and impacts of their realisation and usage does not cause negative impacts on the biodiversity of the Lake.

Figure 7 below illustrates the above changes directly in the extracts of the Drilon Tushemisht Waterscape Project, namely the cartographic documents 'Harta e Infrastrukturës Rrugore' and 'Harta e Sistemeve'.

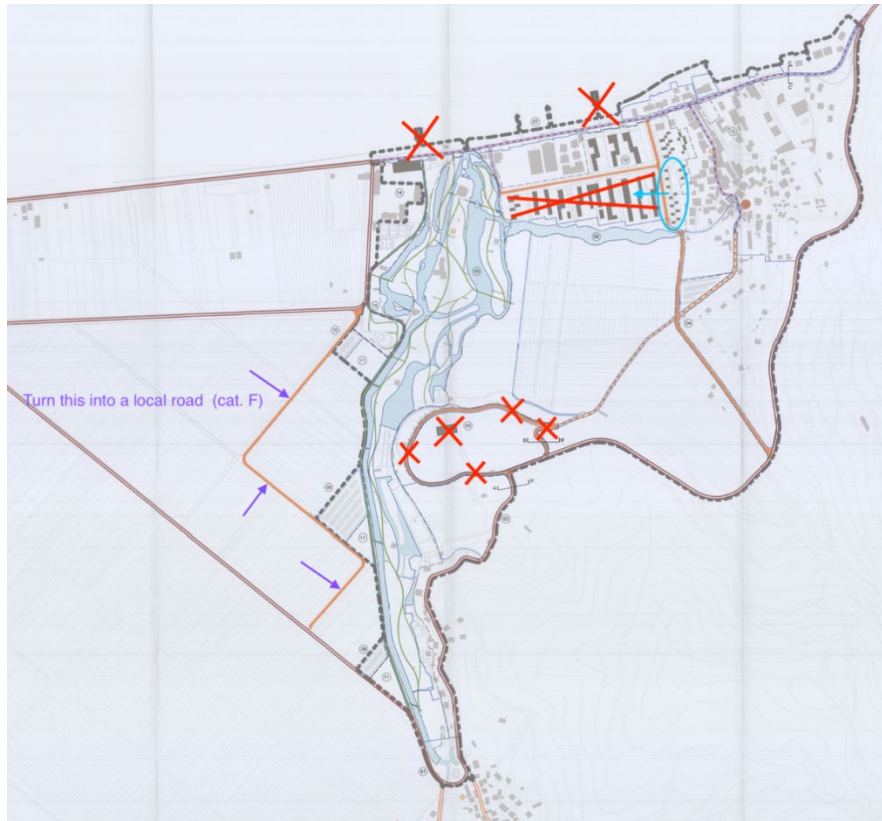


Figure 7 Plan of the Project (excerpt of the document named "Harta e Infrastrukturës Rrugore" approved in this configuration in December 2020). The mission's recommendations are visualised on the map.

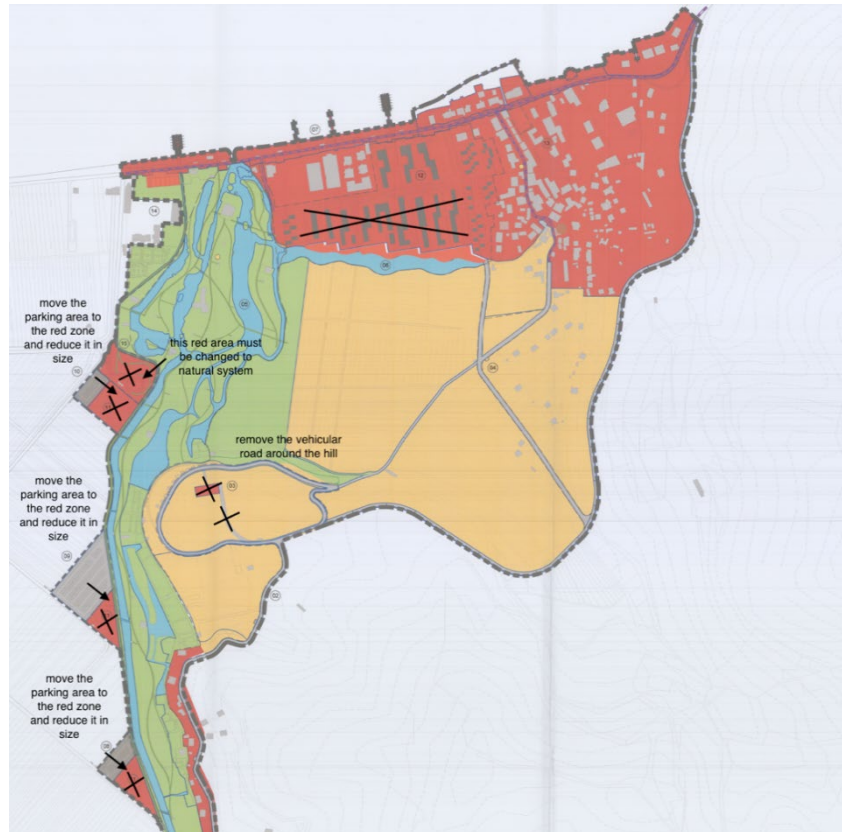


Figure 8 Plan of the Project (excerpt of the document named “Harta e Sistemeve” approved in this configuration in December 2020). The mission’s recommendations to reduce potential negative impacts and urban development trends are visualised on the map.

The mission recommends that the detailed plan included in the project of Drilon-Tushemisht Waterscape Park, modified as recommended above, is adopted as a prescriptive document in terms of planovolumetric indications and with a significantly reduced allowed volumetry. It is also recommended that any new development in that area adopt a much lower density, like that proposed in the outskirts of Tushemisht (see Figure 7 and Figure 8). This mission also recommends downgrading the envisaged new urban route surrounding the hill to a pedestrian and cyclable path and downgrading to category F- local road - the one created to connect the parking lots west of Drilon. In this area, the plots numbered 11 in the document “Harta e Infrastrukturës Rrugore” are marked as part of the urban system in the document named “Harta e Sistemeve”. Since the areas indicated as ‘urban system’ are those where construction activities either exist or are planned, this mission reiterates the recommendation of the 2020 RMM to eliminate the possibility of construction in these areas in order to avoid the start of urbanisation in the agricultural plain that is still preserved.

It is essential that the Drilon-Tushemisht Water Park project, as approved in December 2020 and not in line with the recommendations of the January 2020 RMM, be amended in accordance with the above changes, which are also graphically illustrated below in extracts from the project documentation, and re-approved after amendment. In the absence of formal approval of such modifications, the threats identified by the 2020 RMM remain, as the legal basis established by the approved project in 2020 will allow its full completion, despite the threats identified by some of its provisions.

The World Heritage Committee’s request in Decision 45COM 7B.104 to implement “immediate emergency measures designed to stop new threats and reverse existing ones” cannot be considered fulfilled by the State party of Albania regarding the specific threats posed by the project until the approved project is formally amended as recommended by the mission.

➤ *Pogradec – Drilon - Tushemisht by-pass road and access roads*

The project of the Waterscape, implemented by AADF (Albanian-American Development Fund), needs to coordinate its implementation with the construction of a bypass road connecting Pogradec to the Albanian-North Macedonian border, which in turn is implemented by the Albanian Development Fund (ADF) with funds from the World Bank.

The mission notes that the bypass road connecting Pogradec with the Albanian–North Macedonian border crosses the road from Gurras in the immediate vicinity of the springs. The AADF project envisages some landscaping of the springs. While this design arrangement improves the current dilapidated conditions of the springs, the mission notes that currently, there is almost no vehicular traffic at this spot, with only dirt roads bordering the springs. The new traffic plan, aiming at alleviating traffic on the lakeshore in Tushemisht envisages upgrading local dirt roads inland of Tushemisht and near Gurras to intercommunal/inter-border roads: the diversion from Pogradec to the Albanian-North Macedonian border will connect with the upgraded road from Gurras and Korca near the outlet point of Drilon Springs, so they will be strangled by the intersection of three inter-communal roads, which are also likely to represent a source of pollution due to increased vehicular traffic.

The mission notes that one of the most important spots that sustain Lake Ohrid's hydrological balance and biodiversity-ecosystem, included within the boundaries of the property for the key functional role played in sustaining the Outstanding Universal Value of the property, is being treated as a landscaped vehicular roundabout. Any Heritage Impact Assessment properly carried out during the planning and design process would have been able to indicate the inadequacy of the solution and the negative impacts on the Spring and the Drilon complex.

The Mission notes that the proposed solution for traffic re-organisation is based solely on the parameter of improving the tourist potential of Tushemisht by removing the traffic nuisance in a sought-after tourist area of the Lake, and does not adequately take into account the attributes that convey the OUV of the property.

Having an intersection of three inter-communal roads in correspondence with the springs is likely to generate negative affecting factors and potential threats to one of the key attributes that conveys the OUV of the property located in Albania. Therefore, while the elimination of fish farming has removed a major threat to the biodiversity system of Lake Ohrid, the proximity of the road to the springs introduces a new potential negative impact on this attribute. The Mission strongly recommends that an alternative design for the bypass road be developed as a matter of urgency to avoid the springs area becoming a traffic roundabout.

➤ *Drilon visitor centre and Palafit museum*

The visitor centre is another strand of the Drilon – Tushemisht Waterscape Project. The visitor centre's structure is situated along the lakeshore and hides two existing multistorey buildings, the scale and design of which are inappropriate for the location.

The centre's layout is a rectangle approximately 49m in length, 26m in depth, and a height variable between 6,25 and 6,8m from the ground. Under the two large, pitched roofs, 8m from the ground. Under the two large, pitched roofs, different functions are accommodated: a cafeteria, reception spaces, exhibition and conference spaces, offices, commercial space for local products, and toilets. The structure is in structural laminated wood, and the plan is free with sliding panels to adapt the space to different uses; sliding and fixed glazing delimits the interior from the exterior.



Photo 17 The visitor centre under construction

The mission considers that the volume of the visitor centre is not negligible, but its architectural language and building materials are consistent with its function and acceptable in this area of the landscape. It also mitigates the visual impact of existing, inappropriate constructions immediately behind it.

1.1.7 Avoiding enlargement of Quay Macedonia in the rehabilitation project

Initially, the project involved repairing the deteriorated structures supporting the Quay and extending it by around 1.20m. The 2020 RMM recommended carrying out the rehabilitation, which was needed, without enlarging the quay and providing an updated version of the revised project as suggested for comment. No revised version was received by the World Heritage Centre; the project does not seem to have proceeded. The mission visited the area and did not see signs of rehabilitation work compared to 2020.

The mission reiterates that if/when intentions to repair the quay resume a revised project based on the 2020 RMM recommendations will need to be submitted to the World Heritage Centre for review by the Advisory Bodies.

1.1.8 Halting the approval of Ljubaništa 1 and 2 tourism development projects

The project Ljubaništa 1 has been officially terminated by the Government of North Macedonia as per the minutes of the 40th session of the Government of North Macedonia held on 19 January 2021. The mission, however, could not visit the two sites and ascertain the state of conservation of the property at these two locations.

1.2 Progress made in implementing the recommendations of the 2020 Reactive Monitoring Mission

The analysis of the progress being made in implementing the recommendations from the 2020 Reactive Monitoring Mission is provided in more detail in the table at the end of the report. In this section, only the main recommendations are discussed.

1.2.1 Transboundary cooperation

During the meeting with the mission, the State Party of Albania stressed the importance of joint projects to monitor natural values. Both States Parties are part of the IUCN Biodiversity Task Force. It is expected that the monitoring reports will be the same for the other part of the Lake. Transparency is the key to transboundary cooperation. The Management Committee of the protected area in Albania is also involved in the Transboundary Management Committee of the property. Mutual communication on projects under the umbrella of the ESPOO Convention.

The Albanian authorities recalled the work carried out in 2020 and 2021 to establish the rules of procedure of the Transboundary Management Committee, which was established in 2021 and signed by the Ministers of Environment and Culture of the Republic of Albania and the Republic of North Macedonia.

The mission notes that the only transboundary activity reported concerns a tourism driven project – COOLTOUR – rather than focussing on establishing mechanisms for effective operational collaboration in implementing joint conservation efforts.

Two meetings have been reported between the ministers of Culture of Albania and the Republic of North Macedonia – both happened in conjunction with other UNESCO meetings following the extended 45th session of the World Heritage Committee (Riyadh, 2023) – and one in December 2023, again related to another occasion.

The mission notes that transboundary cooperation appears still in its infancy and needs to be convincingly sustained. High-level strategic directions for transboundary cooperation would need to be defined at the political level in both States Parties, based on the priority of the property for conservation. In this context, the Strategic Recovery Plan can play a fundamental role in giving impetus to the operationalisation of transboundary cooperation and activities.

For instance, coordinated fishing quotas, crucial for preserving salmonid species, are yet to be established, leading to persistent illegal fishing activities. Despite initial recommendations, bilaterally coordinated catch quotas remain unsettled, with delays suggesting a lengthy and ineffective timetable for transboundary monitoring agreements. Illegal salmon fishing in Albania is a threat compounded by insufficient monitoring in North Macedonia, which could have cascading effects on other vulnerable species such as *Cyprinus carpio*.

The Strategic Recovery Plan includes a few transboundary activities – it is noted that a number of actions only envisaged for North Macedonia could apply also to Albania, e.g. sustainable agriculture, prevention of use of plastic, removal of large-scale billboards, strengthening monitoring of water quality from channels and discharges, among others. However, the mission found that transboundary cooperation is yet to begin to function properly. The response to conservation concerns demonstrates that management relies on sporadic third-party initiatives rather than substantive bilateral engagement. This underlines the need for more focused and sustained cross-border cooperation to effectively preserve the property's Outstanding Universal Value.

Strengthening transboundary cooperation mechanisms is essential. High-level bilateral negotiations should take into account the ecological connectivity between Lake Ohrid and Lake Prespa and align the management priorities of both lakes, taking into account the impact of Lake Prespa on the water level and pollution accumulation of Lake Ohrid. These negotiations could also consider the extension of the in-lake zoning to the side of Lake Ohrid in Albania and the possible extension of the buffer zone of the Galichica National Park in North Macedonia to Lake Prespa. The State Party of Albania is also encouraged to consider Ramsar designation for the remaining side of the Lake Ohrid and Galichica (Mali I Thate in Albanian) in Albania.

More efforts need to be deployed to ensure that transboundary cooperation is reinforced at the high-level decision-making tier as well as supported at the operational level through the allocation of resources and incentives for guaranteeing continued commitment by the staff of responsible public institutions.

A clearer definition of priorities for conservation should be established – the mission recommends prioritizing water ecosystems and coastal protection and scrutinizing inappropriate tourism facilities.

Agreement on and implementation of agreed-upon fishing quotas, especially for salmonid species, are crucial to preserve these species and combat illegal fishing activities. Strengthening bilateral communication channels and engagement platforms is necessary, involving experts in transboundary meetings and promoting meaningful dialogue between civil society and relevant stakeholders.

Finally, the development of common principles and transboundary actions for the conservation of the entire lakeshore and coast of Lake Ohrid, encompassing territory both in North Macedonia and Albania, will ensure aligned conservation efforts and sustainable development practices. The regular review of the implementation of the Strategic Recovery Plan and the strengthening of transboundary cooperation, and in particular biodiversity protection/restoration measures, are essential to effectively address transboundary biodiversity conservation challenges. There are several experiences of international cooperation for nature conservation and many positive examples can be drawn from neighbouring countries. No less important is the establishment of transboundary protected areas in the Ohrid region to protect lake ecosystems. It is important that in these cross-border protected areas, in addition to the unification of management objectives, there is also a standardisation of day-to-day management measures.

1.2.2 Urban plans - Legal and illegal constructions, platforms and equipment

➤ Progress in approving urban plans

In Albania, the General Local Plan for the Municipality of Pogradec (GLP – Pogradec) was approved in 2022. As discussed in previous sections of this report, the recommendations of the 2020 RMM concerning some planning provisions have not been taken into account in the finalisation of the plan. The need to submit projects of national importance to the World Heritage Centre before they proceed is mentioned in the Pogradec GLP; however, the Mission does not consider this sufficient to guarantee that these provisions will not be implemented through actual projects or initiatives by individual citizens. Therefore, the mission reiterates the January 2020 RMM recommendation for amending the provisions of the GLP as detailed in the paragraph 1.1.6 of this report.

In North Macedonia, the situation of planning is more complex, as the property lies within the territory of three municipalities – Ohrid, Struga and Debrca – and there are different layers of planning instruments, as explained in the Management Plan for the Natural and Cultural Heritage of the Ohrid Region (2020 – 2029).

With the approval of the Management Plan (2020 – 2029), the moratorium on new constructions has expired and permits are issued on the basis of the Management Plan and the opinion of the Commission for Managing the World Natural and Cultural Heritage of the Ohrid Region.

In Ohrid, the Municipality is responsible for planning in all areas, with the exception of the Old City of Ohrid, which is under the jurisdiction of the Ministry of Transport and Communications.

In relation to the progress being made on the detailed urban plans for the 19 complexes that comprise of the Old Town of Ohrid, the Ministry of Culture informs that they were inspected, and their border were delineated. To proceed with the elaboration of the Development Urban Plans, it is necessary that a request for preparing the conservation basis is submitted by the Municipality or other persons. The mission understands that no progress has been made so far on this matter.

The municipality of Ohrid reports 310 detailed plans/projects approved before the approval of the Management Plan (2020 – 2029); of these 34 are marked as 'non-valid', 47 are marked as 'outside the GUP', whilst the others are distributed in different urban zones. Among the detailed plans in progress, 13 financed by the municipality and 19 urban complexes financed by the Government are indicated. Ohrid Municipality reports 18 detailed plans for the implementation of the Management Plan; two urban plans outside populated areas and one urban plan funded by the government. The plans proposed by private initiative include one amendment to the GUP - Ohrid (zones: UC 8 UB 8.3 and UC 17 UB 17.4); 18 detailed urban plans (DUP), 41 detailed urban plans (DUP) in 31 zones, 10 urban plans, three plans for joint adoption of amendments to the GUP and DUP.

From the information received, it is difficult to understand the nature and potential impact of the above plans and whether they have been fully, partially or not implemented. However, the Mission notes that there are several of them and that in some cases they also provide for the amendment of the GUP.

In 2020, the RMM recommended a cumulative assessment of the impacts of the projects and detailed plans already developed and of those approved and still to be implemented, to verify the possibility to cancel or reduce some. This mission reiterates the validity of this recommendation, which needs to be carried out as soon as possible, before the updating of the planning instruments. The Feasibility Study (see in next sub-chapter) will provide a robust basis for such a cumulative assessment.

The mission notes that the development of the DUPs for the 19 monumental complexes in the Old Town of Ohrid has not advanced since the 2020 RMM. The process needs to be speeded up and all responsible parties must collaborate to achieve the aim of having the DUP prepared and approved, in the full respect of the principles and objectives of the Management Plan (2020 – 2029).

The mission underlines the urgency to proceed with the revision of the GUPs and the detailed level of planning to ensure clarity regarding the legal status of planning provisions and planning proposals. It is essential that conditions, limitations and recommendations for development be clearly set out promptly: unclear planning provisions contribute to create a situation favourable to illegal building activity.

➤ *Feasibility study for the Urban Plan for areas of State importance in the coastal zone of the Ohrid Region*

A 'Feasibility Study for an Urban Plan for Areas and Structures of State Significance for the protected coastal zone in the Ohrid Region' (Official Gazette of the Republic of North Macedonia No. 15/21), an independent technical document aimed to inform the State's Agency for Spatial Planning, the Ministry of Transport and Communications and other relevant authorities of the Republic of North Macedonia on key aspects related to the planning of the Lake Ohrid's coastal zones of national and international significance, is a prerequisite for urban plans of State significance in the Republic of North Macedonia, as required by the 2020 Law on Urban Planning, Article 25), as well as by the Rulebook on Urban Planning (Official Gazette of RNM No. 225/20, 219/21 and 104/22, Article 17, paragraph 9. At the time of writing the current report, this feasibility study, funded by UNESCO Regional Bureau for Science and Culture in Venice and supported by other UN Agencies (UNEP and UNDP) within the framework of the UN Country Team in North Macedonia, is under finalisation. It is expected that the Feasibility Study will contribute to assist the State Party in ensuring that territorial planning of the Lake Ohrid's coastal zone considers national and international heritage designations, protection and management requirements as well as the state of health of the coastal zones.

The feasibility study team (comprising national and international professionals) has been developing a GIS-based database in which can be found information on attributes that convey the property's OUV and other national and local heritage values, affecting factors, vulnerabilities, and protection/management challenges. The geodatabase is expected to contain a wide range of information necessary for informed and heritage place-based spatial planning and might also be used for management decision-making.

The feasibility study builds on the newly issued resource manuals: the Guidance and Toolkit for Impact Assessments in World Heritage Context and the Enhancing our Heritage Toolkit 2.0. The mission met the feasibility study team online, who explained the rationale and progress of their work.

The Feasibility Study, once completed, will provide a robust basis for assessing cumulative impacts on the coastal zone and for spatial planning provisions consistent with the aim of safeguarding the capacity of the attributes to convey the property's OUV and other heritage values. The mission hopes that the Study will be finalised as soon as possible so it can deploy its positive effects. As requested by the World Heritage Committee Decision 45COM7B.104, it is expected that, once completed, the State Party will submit the Feasibility Study to the World Heritage Centre for review by the Advisory Bodies.

➤ *Progress in addressing illegal constructions*

The 2020 Reactive Monitoring Mission recommended a series of actions concerning the remediation of impacts caused by illegal buildings and structures, including their demolitions, whenever indispensable for the attributes to continue to convey the property's OUV.

Since the issue of illegal and informal constructions is complex, a phased approach was recommended with steps to be progressively implemented.

The most urgent requested measures included the preparation of an action plan for addressing illegal building activities with a priority list of the most negatively impacting illegal construction and requiring demolition.

In 2023, the Galichica National Park began documenting illegal constructions within its boundaries and preparing a cartographic database. To this aim, an orthophoto mosaic map has been elaborated using drone flights and integrating data from the Agency for Real Estate Cadastre. The work is still in progress, and therefore, no information can yet be released. The National Park can only document illegalities and inform the responsible authorities to undertake the necessary follow-up actions.

The Ministry of Transport and Communication is responsible for determining the juridical status of illegal buildings in North Macedonia. The number of requests for legalisation in the municipalities of Ohrid and Struga as of March 2024 is 917, of which 402 are pending, and 476 are indicated as "completed" (it is understood that "completed" means legalised) in Ohrid, whilst eight are pending, and 31 are indicated as completed in the municipality of Struga.

The municipality of Ohrid has made an inventory of the illegal buildings within the territory of the municipality (but outside the Old City of Ohrid, which is under the responsibility of the Ministry of Transport and Communications): a little less than 20,000 different illegal objects have been identified. In protected areas, before proceeding with the legalization, it is necessary to receive advice from the relevant institution responsible for protection (either nature or culture) and only after, the procedure can continue.

The process for legalizing illegal constructions carried out within 50m of the Coastal Zone has been suspended in accordance with Decision 08-18774/54 dated 27 December 2023 concerning the implementation of existing urban plans, the adoption of new plans, and the determination of the procedures for the legalization of illegal buildings.

The municipality of Struga has communicated that between 2021 and 2023, 65 illegal buildings have been legalized, whilst 9 were demolished. For the demolished buildings, there is an indication of their typology, but no explanation is available of which structures have been legalised.

No map has been produced by the Municipalities or the Ministry of Transport, as requested, apparently due to technical difficulties, given the high number of illegalities. The mission notes that the Galichica National Park is preparing a cartographic database of illegal constructions. In order to speed up the process of dealing with the problem of illegal structures, it would be useful for the municipalities and the Ministry of Transport and Communications to work with the Park to develop a joint database of illegal structures within the Park, as a basis for monitoring the situation and progress in dealing with the problem.

The Municipalities and the Ministry of Transport and Communications have provided lists of legalized buildings and illegal buildings but have not worked on a priority list for illegal constructions that should be demolished due to their negative impacts on OUV. The criteria for granting or not granting the possibility of legalisation to illegal constructions should be based on whether and to what extent they undermine the integrity and authenticity of the OUV attributes of the property, rather than on the period of construction or other criteria unrelated to the assessment of their impact on OUV.

At this stage, the States Parties seem to have yet to prepare an action plan to systematically address the issue of illegal constructions and to remediate their negative impacts on OUV and its supporting attributes.

The mission considers that a map indicating illegal buildings and structures, particularly along the coast area – i.e., 500m from the coastline - is necessary to have a clearer understanding of the scale

and gravity of the problem and the remedial actions needed. The mission considers that the documentation work undertaken by the Galichica National Park should be continued and extended.

Both the Ministry of Culture and the Commission for the Management of the World Natural and Cultural Heritage of the Ohrid Region should be consulted for an assessment of the nature and extent of the impact on the heritage values, the OUV and their supporting attributes. The Mission considers that their opinion on applications for legalisation of illegal buildings should be binding.

The mission reiterates the 2020 RMM recommendations to proceed with preparing an action plan with clear criteria and priorities set out to address the issue of illegal buildings. The aim should not be administrative – to legalise illegal constructions – but to improve conservation conditions and reduce the vulnerability of integrity and authenticity. This task should be one of the priority actions in the Strategic Recovery Plan.

➤ *The Lagadin Hotel*

The mission met with the Minister of Culture, who informed them that the issue of the Lagadin Hotel had been complex and protracted, but that in the end the Administrative Court had confirmed the validity of the building permit issued by the Municipality of Ohrid in 2016. In order to revoke the building permit, the Ministry of Culture should have paid compensation to the permit holder. The Ministry of Culture decided not to proceed. It is therefore expected that the construction of the Lagadin Hotel will continue and be completed.

1.2.3 Wastewater management treatment system and landfills

In Albania, the wastewater management treatment plant in Bucimas needs to be updated. A task force led by the National Environmental Agency of water is in charge of investigating how to improve it, as in 2020, it was already reaching the maximum of its ability. The task force had 90 days to examine the situation regarding the water treatment and draw its conclusions. It found that, especially in tourist areas, the quality of water was not good.

The entity managing water supply and wastewater collection and treatment is Pogradec Water Utility (PWU). A feasibility study funded by GIZ was prepared (December 2022) to improve water distribution and wastewater collection. The findings are summarised in the following paragraph, excerpted from the Feasibility Study: “Although the sewerage coverage rate is still low about 33% in this Administrative Unit, there are ongoing projects financed by the Albanian Government which will improve the sewer collection to 100 % to these villages after a year. The rest of the Administrative Units and respective villages either do not have sewer collection systems at all or have existing old sewers which are in severe condition as no maintenance is provided. [...] Pogradec Utility covers only 49% of the service area [; it] has a Wastewater Treatment Plant which serves Pogradec City and the major part of Bucimas Administration Unit. The project was divided into three phases. The first phase included construction of a wastewater treatment plant with capacity 25,000 population equivalent and of the main collector and one pumping station for the city of Pogradec. [...] The second phase consisted in increasing the treatment capacity of the plant to 54,000 population equivalent and the introduction of chemical treatment to the process [...] construction of a new pumping station and water discharge to the plant and finalizing the construction of the sewerage network in the town and surrounding villages [completed in 2015]. The third phase [under implementation] shall increase the capacity of the plant to 75,000 population equivalent and cover in full the area of Bucimas. There is no sewer treatment available for the villages besides the ones located in Bucimas Administration unit [and] which are linked to Pogradec WWTP.”⁵ The Feasibility Study proposes possible options for the villages of Udenisht, Lin, and Liqenas (in the Lake Ohrid catchment area by Prespa Lake), with indicated expected technical challenges and construction estimation costs.

Following the feasibility study, it is unclear whether a plan has been developed to address the issue of wastewater collection and management in villages not connected to the Bucimas treatment plant.

⁵ (GIZ funded Feasibility Study, 2022, pp. 40-41)

In December 2023, Albania passed a Normative Act that established the obligations for tourist enterprise actors to equip themselves with wastewater treatment system, if they are not connected with the wastewater grid. This provision applies to a wide range of tourism accommodation facilities, including agritourism and other accommodating structures. Within 90 days, these categories of activities are obliged to install these treatment facilities. A Task Force for monitoring within the national Water Supply and Sewerage Agency is established.

The mission notes that the legislation seeks to overcome the problem of the lack of sewage system in many villages and settled areas, which is positive and to create an understanding that sewerage must follow certain standards and is an obligation needed to preserve the quality of the environment and human health. However, it is noted that 90 days to conform to the law might not be realistic in a context where inadequate sewerage remains a widespread problem and, consequently, the capacity to ensure adequate standards of sewage systems by private persons may be limited or missing. Additionally, it is not clear what the envisaged measures are in case of non-compliance with the legislation. The mission also notes that the monitoring Task Force will need to be adequately resourced and given a clear mandate in relation to follow-up should monitoring reveal partial or complete non-compliance with the new law; otherwise, the risk is that the expected results of the new law will not be achieved and wastewater release into the water streams or the aquifers will continue.

The mission recommends that, wherever possible, both residential and commercial activities should be connected to the sewerage network that is being built, and that the existing treatment plant in Bucimas should be expanded, if necessary, and made to function properly. The recourse to independent wastewater treatment systems for private entities should be limited to areas which cannot be reached by the wastewater grid, and which are currently not densely settled. Capacity building for private actors will be indispensable, as well as financial support, to ensure that wastewater management is properly addressed.

In North Macedonia, the Public Enterprise Kollector System, which is responsible for the sewerage in the country, informed that the system extends for 41 km between Peshtani (Ohrid) and Elen Kamen (Struga). The mission visited the Kollector base in Ohrid: it was explained that the project of dividing the waste from the rainwater will take 2 to 2.5 years and should start in October 2024. For the Elshani village, the process of building the pipes for the sewage system has started and it will be progressively connected to the system. The design of wastewater treatment plants for the villages of Ljubanishta, Radozhda and Podmolje is under preparation. A project is also being prepared for the secondary collector system from Elshani and the rehabilitation of the treatment plant in Vranishta. The mission visited a site in Ohrid, to the west of the promontory of the Old Town, where wastewater flows into the Lake: it was explained that this part of the city is yet to be connected to the wastewater collector system.



Photo 18 Wastewater flowing into the Lake



Photo 19 Wastewater flowing into the Lake

The Municipality of Debrca informed that they worked on solving the problem at Volino and that funds were approved to build the sewage connections of Trebenishta Village, which should start in early 2025.

The mission notes that, in North Macedonia, improving the wastewater management system is progressing but it has yet to be completed, and wastewater is still discharged into the Lake. While this could be observed in North Macedonia, it cannot be excluded for Albania.

The completion and maintenance of the wastewater collector and treatment plants in both States Parties represent a key priority to reduce nutrient inflows into Lake Ohrid. Financial and organisational resources should be channelled to speed up the process.

Regarding solid waste management, the Ministry of Environment of the Republic of North Macedonia informed the mission that there are resources for a project to be initiated: the new landfill should be in Novaci and several transfer stations would be planned in the region to collect waste for transfer to Novaci; therefore, Bukovo should close. The plan at the national level is to have the new system with two large landfills and 4 or 5 transfer stations completed in some four years. The Plan will start with South Pelagonia and provide new equipment to the municipalities from next year.

The mission considers it important that the State Party informs the World Heritage Centre before making the final decision about where the transfer station for the Ohrid Region will be located.

1.2.4 Redirection of Sateska river

The Sateska diversion has been completed. The riverbed is finished and the re-diversion should be completed in the next few months. The Ministry of Environment informed the mission that the Company responsible for the Hydropower plan will support this system. A Tank for storing the riverbed sediments has been constructed and Debrca Municipality is responsible for the removal of the sediments. The establishment of the equipment to control the operativity of the system is still missing and it is expected that UNDP will complete it by the end of 2024. An action plan that will set out the responsibilities of the different institutions is envisaged. However, the project only allows for a limited diverted flow (15m³/s), and this capacity of re-diversion is unlikely to resolve the issue of sediment and pollutants that will continue to flow into Lake Ohrid during important meteorological

events. On 5 December 2022, UNDP received a complaint concerning the non-compliance with UNDP social and environmental commitments (SES) in the context of the project “Integrated climate-resilient transboundary flood risk management in the Drin River basin in the Western Balkans (Drin FRM Project)”, which includes the sub-project of redirecting the Sateska River. The complaint’s concerns mainly expressed the inadequacy of the Environmental Impact Assessment that lacked comprehensive studies on aquatic life in the river, groundwater analysis, inadequate analysis on the impact of the species related to a sediment-collecting dam that is to be placed on the river, and on the natural sediment and organic debris flow and the impacts on the Lake Ohrid and the River Crn Drim resulting from the removal of the decades old inflow. The allegations triggered an investigation which resulted in a report⁶ which provides a series of recommendations to ensure full compliance with UNDP’s SES. The mission considers important that these recommendations be fulfilled.

1.2.5 Protection of Studenčišča Marsh (SM)

During the meeting with the Ministry of Environment, the authorities explained that the draft Law for proclaiming Studenčišča Marsh (SM) as a Nature Park (IUCN cat. IV) is currently under review by the Assembly of the Republic of North Macedonia, hopefully to be voted soon. The Ministry of Environment and the Municipality had meetings with owners. The mission was informed that the Law for the Proclamation of Ohrid as a Monument of Nature was also before the parliament, and there was hope that this task would be completed once the new government was in place. Historically, the shores of Lake Ohrid were once home to numerous wetlands, such as the Studenčišča Marsh (SM). Over time, these wetlands have disappeared due to human development, particularly in the last centuries. SM stands as the sole remnant of Ohrid’s lost wetland heritage. The mission noted that the wetland is basically surrounded by a densely developed city, inundated with a vast number of visitors during the summer months. Studenčišča Marsh does not require a promenade dividing the dwindling wetland from the Lake Ohrid coastline, but rather ample space to thrive, along with a network of both surface and underground tributaries to sustain it, and a permanent link with water of Lake Ohrid. The wetland needs to be connected permanently with the Lake and development has reduced this connectivity. The proposed zoning is too compartmentalised: each zone covers a small area.

Despite recent ecological degradation, the marsh retains significant nature conservation potential, particularly with ecological restoration measures. Unlike many coastal reeds that stand along Lake Ohrid, Studenčišča Marsh offers a unique habitat characterized by dense reeds, making it an important nesting site for waterbirds and other species. SM is part of the Lake Ohrid Wetland of International Importance under the Ramsar Convention, highlighting its conservation significance. The presence of threatened species like the European pond turtle and Macedonian crested newt underscores the importance of protecting this ecosystem. Endemic species such as planarian worms, diatoms, gastropods, and certain fish species are also present in the area, as highlighted in the Study of Valorisation for SM.

The SM, listed as one of Lake Ohrid’s nine important nature conservation areas, lacks clear recognition of its connection with the neighbouring Mazija area, both reliant on freshwater sources including the Studenčišča Canal. Uncontrolled urbanization, agricultural expansion, reduced freshwater inputs, and pollution threaten SM, converting it into terrestrial reedbeds of lower conservation value. Less than 10% of SM remains open water, incompatible with agriculture due to the wetland’s ecological preservation objectives.

Pollution and urbanisation are encroaching on the minimal area of the Studenčišča marsh, with vague plans such as the plan to develop a new marina (in the process of being relocated) or the inappropriate development of the pedestrian promenade (already built) along the shores of the Lake, which interrupts/prevents the regular and sufficient flow of lake water into the wetland. This promenade disrupts freshwater flow and accelerates land conversion.

⁶ Accessible at <https://secu.info.undp.org/case-file/secu0021>.

The draft Law for proclaiming SM as a Nature Park (IUCN cat. IV) does not align with international Protected Area (PA) standards according to IUCN PA categorisation and lacks provisions to prevent further degradation of the SM. Key points include: zoning that contradicts IUCN standards, with less than 10% of the area designated as strictly protected while allowing destructive activities in adjacent parts; the SM's small size makes it challenging to balance nature protection with agricultural and tourism activities; water source disruption accelerates habitat fragmentation and land conversion; the draft Law excludes ecologically vital areas from protection. A buffer zone, including Gorica North, should prohibit development and promote organic farming and eco-tourism. To address these issues, an effective, well-managed PA with ecological restoration interventions is crucial, starting with the establishment of the PA, followed by a comprehensive management plan implementation.

Biljanini Springs is located near the town of Ohrid in North Macedonia, on the eastern shore of Lake Ohrid. These springs are a significant source of fresh water for the Lake, contributing to its unique hydrological and ecological balance. The pristine waters of Biljanini Springs support diverse aquatic life and are crucial for maintaining the Lake's overall water quality.

Urgent measures are needed to link SM with the Biljanini Springs and to restrict visitor activities in order to preserve the fragmented area. While the temporary closure of the cafes on the remaining platforms on the promenade is welcome, although doubts remain as to whether they have not been completely dismantled, new construction poses an additional threat to the ecological character of SM.

The draft Law for proclaiming Studenčišča Marsh as a Nature Park should be revised to ensure compliance with international Protected Area (PA) standards. The zoning within the proposed Nature Park needs to align with IUCN guidelines, designating the whole area as strictly protected to safeguard its ecological integrity while considering sustainable land use practices in adjacent areas.

Measures should be implemented to mitigate disruptions to water sources, which accelerate habitat fragmentation and land conversion, possibly involving restoring natural water flows and preventing pollution from entering the marsh.

The draft law should encompass all ecologically significant areas of Studenčišča Marsh within the Nature Park boundaries to ensure comprehensive protection and conservation of biodiversity.

To prevent further degradation, the proposed territory of the Nature Park should also include adjacent areas which, after decontamination and restoration, have the potential to become integral parts of the water regime of this last remaining wetland on the Lake's shore.

After incorporating these lands into the Studenčišča Marsh Nature Park, a comprehensive restoration plan should be developed and implemented. This plan should focus on revitalizing the disappearing and dying parts of the marsh due to disturbed water regimes, restoring the connection with the Mazija area, and revitalizing the land after the removal of the nursery.

The promenade design should be modified to allow for regular and sufficient water flow, minimizing its impact on the marsh's hydrology. This includes introducing water management measures and restoring the natural hydrological connectivity between the Lake and the marsh by removing barriers or obstacles created by the promenade.

Creating national-level buffer zones for the Studenčišča Marsh Nature Park, including areas like Gorica North, is essential to prevent detrimental development and promote sustainable practices such as organic farming and eco-tourism.

A comprehensive evaluation of the impacts of the recently constructed promenade on the hydrology and ecology of the marsh is necessary.

Effective management strategies, including ecological restoration interventions, should be established for the Studenčišča Marsh Nature Park. This involves developing and implementing a comprehensive management plan to guide conservation efforts effectively.

1.2.6 Strictly protected area of St. Naum springs

The St. Naum Complex, consisting of subaquatic and terrestrial springs near the monastery of St. Naum, is a cultural attribute of the OUV of the World Heritage property and has important biodiversity significance. It hosts unique flora and fauna, with several species endemic to Lake Ohrid, including critically endangered plants like *Angelica palustris*.

However, the area faces threats from mass tourism and development, endangering species such as *Emys orbicularis* and *Testudo hermanni*.

Despite being designated a Strict Protection Zone within the Galichica National Park, the iconic island in the area has been excluded from protection to facilitate tourism facilities, resulting in environmental degradation and pollution from activities such as boat transport and restaurant operations. The restaurant's sewerage system is malfunctioning, contributing to poor water quality and bacterial contamination in the springs.

Urgent action is needed to address these threats and protect the unique biodiversity of the St. Naum Complex.

The Special Management Plan for the St. Naum Complex, prepared by Galichica NP in May 2022 at the Government's request, lacks sufficient measures to address identified threats. The main issues outlined in the plan include habitat fragmentation and destruction, wastewater treatment, and threats to biota.

Construction projects like the Ostrovo restaurant complex and increasing visitor numbers pose significant threats to the area's natural environment. The plan fails to address the restaurant's oversized facilities and illegal location, which cater to mass visitation incompatible with nature conservation goals. Additionally, proposed measures like installing portable toilets are inadequate to mitigate pollution risks. Instead, limiting visitor numbers and upgrading sewage treatment facilities are more effective solutions. Moreover, the plan lacks effective measures to protect endangered species (such as the Macedonian Pond Turtle (*Emys orbicularis*), the Balkan Trout (*Salmo farioides*), and the Ohrid Spring Snail (*Bythinella ohridana*) and their habitats, requiring direct habitat protection and visitor management strategies to minimize environmental impact.



Photo 20 Ostrovo restaurant

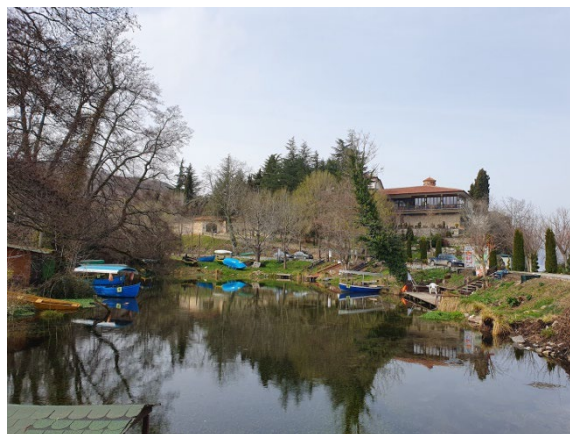


Photo 21 St Naum area



Photo 22 View towards Ostrovo restaurant structures



Photo 23 Entrance of Ostrovo restaurant

The field visit confirmed the Special Management Plan's findings that excessive visitor numbers pose the primary threat to the St. Naum complex, leading to habitat destruction. The Ostrovo restaurant, constructed partially illegally, disrupts the area's natural features and biodiversity. This conflicts with its location near the springs of St. Naum, which is a recognized area of ecological significance, contributing to the rich biodiversity of the region.

The proliferation of boats and proposed expansion of visitor pathways in the Special Management Plan further jeopardize the ecological integrity of the area. Excessive numbers of visitors passing through the complex affect its heritage and natural value, warranting a reconsideration of visitor promotion strategies. The current water purification system at the restaurant is inadequate for the large influx of visitors. Endangered species and habitats are directly threatened by physical disturbance and pollution, exacerbated by insufficient monitoring of protection measures against the high visitor traffic at St. Naum.

Implementing measures to limiting visitor numbers and regulating activities is essential to mitigate environmental impact, particularly around sensitive areas like the springs and habitats of endangered species.

In the medium-term, the Ostrovo restaurant should be removed, the island cleaned, and dying biodiversity restored. The island should become a unique destination, offering experiences led by professional guides from the national park or local community rather than just a place for good coffee.

Tourism activities should be limited by preventing the opening of new water routes and restricting the number of boats and visitors, possibly through entrance fees for transient visitors.

Upgrading wastewater treatment is crucial, with enhancements to ensure full functionality and proper discharge of treated water, alongside scheduled maintenance and supervision. Conservation plans should be developed to protect endangered species, including establishing quiet zones and physical barriers, monitored by Galichica National Park staff.

A regular monitoring protocol for spring parameters should be established using scientific methodology for reliable comparison over time. Management plans should be aligned with national nature protection laws and the Galichica National Park Management Plan, especially proposals affecting the St. Naum area. Concrete measures for species and habitat protection must be included in the Special Management Plan, along with a monitoring plan to assess their effectiveness.

Visitor services such as food, drink, parking, and stalls should be relocated to the periphery of the area or outside the St. Naum complex.

1.2.7. Conservation issues at the orthodox Church of St. Naum

The mission visited the Orthodox Church and found signs of decay in the plasters and mural paintings that must be addressed, as well as damages caused by inattentive uses. The mission was not able to visit all the churches and religious complexes within the property due to lack of time, so the state of conservation, maintenance and upkeep of these monuments, which are key attributes conveying the cultural dimensions of the OUV, could not be ascertained. Given that issues of inadequate use and maintenance were raised during the January 2020 RMM of the Narthex of Saint Sophia Church, and that some problems were identified in the Church of Saint Naum during this mission, the Mission recommends that thorough and regular inspections of all churches and religious complexes within the property be carried out by the competent heritage protection agency.

It is also recommended that an advisory mission be invited to specifically address the conservation issues of the churches and their mural paintings within the property.



Photo 24 Effects of humidity and water infiltration, soiling



Photo 25 Large crack in the plaster, effects of salt crystallisation



Photo 26 Crack in the painted plaster, effects of salt crystallization on the surface of the paintings



Photo 27 Loss of painted layers and of plaster

1.2.8 Protection of Galichica Park

Galichica National Park encompasses a wide spectrum of ecosystems and habitats, ranging from the Lake's coastline to forests and mountain peaks, including rare alpine habitats. The variety of habitats and biodiversity preserved here significantly enhance the OUV of the World Heritage property. The mandate of the Galichica National Park is to guarantee the protection of the natural heritage both today and in the years to come.

The park authorities explained that the biggest threat for the park is the urbanisation and the illegal constructions. The public Galichica Park institution is the largest management public institution within Ohrid region. The Park is not responsible for granting planning permission or deciding on the status and future of illegal structures. Its competence/responsibility is to prepare the basic information on illegal constructions and pass it on to the relevant inspectors. Galichica Park's initiatives to monitor and manage the issue of illegal construction are reported elsewhere in this report.

Galichica National Park has made notable progress in implementing the 2020 mission recommendations. The park has significantly reduced timber extraction to protect forest ecosystems and promote biodiversity. Sustainable tourism initiatives have been launched, focusing on eco-friendly activities and infrastructure improvements to minimize environmental impact. Additionally, the successful introduction of red deer has enhanced biodiversity and provided new opportunities for wildlife observation and conservation efforts.

➤ *The Management of Galichica National Park*

The Galichica National Park Management Plan (GNPMP 2021-2030) was approved in 2020 with validity 2021 – 2030. It outlined strategies for conservation, biodiversity preservation, zoning, visitor management, and sustainable development.

However, the Plan recognises that current management staff needs to see its capacity enhanced to effectively implement the envisaged management measures in the plan. To solve this problem, the GNPMP 2021-2030 proposes measures such as training for current rangers, creating a corps of "friends of the national park", strengthening forest protection and improving the skills of employees through systematic training. The aim of these steps is to improve management efficiency while encouraging community involvement through educational initiatives, i.e., training sessions and guided tours for visitors and locals, with a particular focus on the younger generation. The mission recommends that the national park entity be supported in implementing the planned measures.

To increase the effectiveness of conservation efforts, it is essential to develop and implement a system of regular capacity building and training programmes for existing staff. Enhancing survey and monitoring capacity through regular training sessions and the involvement of local communities is also crucial. Establishing a system for regular interaction with local stakeholders, including residents within the national park territory, as well as regular and occasional visitors, is imperative. In this process, rangers should play a pivotal role, particularly within their designated districts, to ensure effective communication and engagement with all relevant parties.

➤ *Visitor management in Galichica National Park*

There is currently no visitor management plan in place for the park. However, the Galichica National Park (NP) Management Plan (2021-2030) defines the role of tourism and presents an opportunity to integrate protective and tourism measures. Measures include developing and implementing a visitor monitoring system, constructing and maintaining tourism infrastructure, improving tourist offerings, and promoting alternative tourism activities.

The newly developed zoning for Galichica NP reflects the varied roles of visitor management in specific zones. For instance, in the zone of strict protection, which is most vulnerable to visitor impact, visits are permitted under strictly regulated conditions. These conditions include walking along designated trails on Golem Grad Island, participating in boat rides on the St. Naum Spring organized by PINPG, and hiking the Magaro peak via marked mountaineering trails.

According to this document, the park aspires to serve as a sustainable destination model for other protected areas and tourist destinations in the region, where preserved nature, cultural heritage, tourism, and the local population are intertwined in a sustainable manner.

The mission notes that the absence of a visitor management plan suggests a lack of coordinated efforts to address visitor impacts and ensure sustainable tourism practices. Integrating protective and tourism measures in the visitor management plan can be, however, a positive step towards reconciling visitor experiences with conservation objectives. Zoning specific areas for different levels of visitor access reflects an understanding of the need to manage visitor impacts in vulnerable zones.

To enhance the management of visitor activities within the park, several recommendations are proposed.

- Firstly, there is a need to develop and implement a comprehensive visitor management plan aimed at addressing visitor impacts and promoting sustainable tourism practices. This plan should encompass strategies for regulating visitor numbers, minimizing disturbance to sensitive areas, and providing educational resources to promote responsible behaviour.
- Continuous monitoring of visitor activities and their impacts is essential to assess the effectiveness of management strategies and adapt them as needed. Strengthening enforcement measures to ensure compliance with visitor regulations is also crucial in protecting sensitive habitats and wildlife.
- Furthermore, engaging with local communities and stakeholders is vital to foster a sense of ownership and stewardship over the park's resources. Involving local residents in decision-making processes and encouraging their participation in conservation efforts can foster a greater sense of community responsibility.
- Collaboration with other protected areas and tourist destinations is recommended to share best practices and promote initiatives aimed at sustaining the OUV of the property. By working together, these entities can leverage their collective expertise and resources to enhance the overall sustainability of the area.

➤ *Motorized access in Galichica National Park*

Motorized access in the Galichica National Park has a long tradition. Most of the roads used today were built even before the creation of the national park. The national park is crossed by two main asphalt roads. One along the coast and the other connects Lake Ohrid with Lake Prespa. In addition, there are roads leading to alpine villages and former roads used recently for forest management and as access corridors to mountain meadows for cattle.

There are operators that drive tourists by car in the park and the biggest threat is represented by the 4x4 driving wheels vehicles. The Galichica Park Authority cannot ban them, so it has set up routes where the operators can drive the vehicles with tourists: there are 10 routes and the roads mostly overlap. The roads are not all the way asphalted. The trails use also local roads that are not asphalted. Other trails include asphalted roads that are part of the normal regional roads of the country.

The mission considers the broader biodiversity values of the Galichica National Park to be important and therefore makes additional observations and recommendations to strengthen the protection and management of the Park.

Protecting Galichica National Park is crucial for conserving the watershed and groundwater systems that directly support Lake Ohrid as a World Heritage property. The park's forests and ecosystems play a vital role in regulating water flow, preventing soil erosion, and maintaining water quality. These natural processes ensure the Lake's ecological integrity and its OUV, which includes unique biodiversity, cultural heritage, and pristine natural beauty. Effective conservation of Galichica National Park is essential for the long-term sustainability of both the Lake and the surrounding environment.

The Galichica Park has authorization to stop using other roads. The impact of the roads is not monitored in terms of biodiversity. Galichica Park tries to collect data for species to be able to count

them. Galichica Park establishes agreements with SUV companies, through a procedure of negotiation and if the companies do not sign the agreement, they cannot come in the Park. For individuals, usually they hire private cars. Companies from other countries that want access to the park buy temporary short-term permits; the park registers them in the park and they stay on the approved trails.

In the cases of non-abiding companies, it is the Ministry of Environment and especially the Inspectorate of Environment that has the authority to take them to court. The Inspectorate that is based in Skopje makes use of the rangers' reports. The rangers have the authority to conduct regular inspections themselves. Theoretically, they can prescribe fines if they find a vehicle not registered in the system, but this is difficult as there is no concrete regulation to support this action. However, only the Ministry of the Environment can collect money on the spot. The Forestry Police have the authority to issue fines on the spot and the park cooperates with them, although this cooperation is not very active at the moment. Ideally, the Environmental Inspectorate should authorise the rangers to issue fines on the spot, and the Inspectorate would be willing to train the rangers to do so, but this authority has not yet been delegated.

The extensive network of asphalt and dirt roads fragments the territory of the park which has a negative impact on local biodiversity. Today, the roads inherited from the past facilitate access for visitors to mountainous areas, especially in the summer.

The extensive inherited road network increases intensity of human access to the park, leading to habitat fragmentation, disturbance to wildlife, and soil erosion. Off-road vehicle tourism and illegal 4x4 driving further degrade sensitive habitats, potentially causing irreversible damage to habitat and biodiversity. These activities pose a threat to the conservation objectives of the park and undermine efforts to protect its natural ecosystems.

To enhance conservation efforts and minimize environmental impact within the park, several recommendations are proposed by the mission.

- Firstly, prioritizing maintenance of main roads while ceasing maintenance in ecologically sensitive areas will help preserve habitat integrity and minimize habitat fragmentation. Additionally, expansion of roads within the park should be excluded to further mitigate habitat disruption and preserve OUV.
- Strict regulations and enforcement measures should be implemented to deter illegal off-road driving, gradually phasing out this activity to protect sensitive areas from degradation. Promotion of eco-friendly travel options, such as shuttle services or cycling routes, can reduce the environmental footprint of transportation within the park, minimizing disturbance to wildlife and ecosystems.
- Furthermore, educating visitors about the importance of biodiversity conservation and responsible travel practices is essential. By raising awareness and fostering a sense of stewardship, visitors can actively contribute to the park's conservation objectives, ensuring its natural beauty and biodiversity are preserved for future generations.

1.2.9 Lake Ohrid's water level and quality

Eutrophication poses the biggest threat to the water quality of the Lake, which in turn alters the Lake's vegetation profile, its ecology and thereby the property's Outstanding Universal Value.

The Ministry of Environment of Albania reported that, in order to protect the flora and fauna of the Lake, fishing nets have been removed from the Lake and aquaculture has been removed in Drilon area. In general, aquaculture is not allowed in the area in Albania.

In the Republic of North Macedonia, the Hydrobiological Institute, a public scientific, not for profit organisation and an advisory body to the State Party decision-makers provides monitoring data on water quality in the lake basin. The Institute's main role is to provide data and results that can form the basis for future strategic documents, plans and laws regarding the protection of nature aspects of the property. In 2022, the Institute assessed the water quality of Crn Drim River based on the physical chemical and some biological parameters. In 2023, it implemented quality water controls

on Sateska, a vulnerable and extremely important area, since it is the place where most of the endemic species are inhabiting. These recent assessments of the water quality of the Crn Drim River indicate a level of improvement that reflects effective environmental management efforts, while noting that, according to the State Party of North Macedonia, the physico-chemical parameters showed an increased organic and nutrient load, especially along the Crn River, in the localities of Ložani, Tašmaruništa and Dobovjani, which indicates an intensive anthropogenic influence that contributes to the acceleration of the eutrophication process. Similarly enhanced quality water controls on the Sateska River have been implemented, reducing pollution levels and mitigating adverse impacts on the surrounding ecosystems. These measures, which focus on water level as well as temperature, nutrient levels, Secchi depth, heavy metals and toxins, and dissolved oxygen, are critical to maintaining the overall health and sustainability of lake systems.

The Institute also assessed anthropogenic influence on the St Naum springs as they are an important source of fresh water.

The Institute is involved in transboundary activities and communicates with the Albanian counterparts. For instance, they collaborate with the University of Tirana on projects on water quality and biodiversity for Lake Ohrid. They hosted the 2nd meeting of the Joint Committee for fisheries of Ohrid and Prespa Lakes. This meeting was attended by representatives of the respective Ministries and State Inspectorates of Agriculture of the Republic of North Macedonia and Albania. There is an ongoing effort to harmonize the fisheries legislation. At present, monitoring of water quality in the Lakes (basic physical and chemical parameters, organic and nutrient load, microbiological parameters and bioindicators) is only carried out on a seasonal basis. However, it should be carried out on a monthly basis. The Institute has indicated that more human resources would be needed to carry out proper monitoring.

In the meeting that the mission experts had with the Ministry of Environment of North Macedonia, it was explained that currently the Hydrobiological Institute is funded specifically for monitoring the quality of water. In collaboration with Albania, the monitoring should be expanded over the whole Lake.

The water level of Lake Ohrid is monitored daily by the Hydrometeorological Service of the Republic of North Macedonia, and information is provided daily to the Ministry of the Environment and Physical Planning, to relevant ministries and to the public. The water level of the Lake is managed in accordance with water management planning (permit) issued by the Ministry of Environment and Physical Planning. The level is set between 693.10 and 693.70 metres and can fluctuate up to 60 cm. The authorities in North Macedonia report that this level is respected. The speed at which the water level fluctuates depends on the weather conditions. Before construction of the electric powerplant, the level was fluctuating between 691m and 694.59m, with 694.59m being the maximum. The Hydrobiological Institute is monitoring the biodiversity of the Lake Ohrid and is in constant communication with the Ministry of Environment and Physical Planning. Climate change poses significant challenges to Lake Ohrid and its biodiversity. Increasing water temperatures disrupt the Lake's ecological balance, affecting the distribution and health of endemic species. Shifts in precipitation patterns alter water levels and nutrient inputs, influencing habitat availability and species interactions. These changes underscore the importance of adaptive management strategies to mitigate impacts and sustain the unique biodiversity of Lake Ohrid amidst evolving environmental conditions.

Recommendations for the preservation of Lake Ohrid's ecosystem include various measures aimed at reducing nutrient inputs, enhancing monitoring programs, and fostering transboundary cooperation, as follows:

- Complete renewal of the wastewater network, setting a goal to decrease nutrient inputs by 50% below 2007 levels, and implementing the Lake Ohrid Watershed Management Plan across borders.
- Monitoring species compositions should be integrated into regular monitoring programmes, with a focus on major trout spawning grounds. Additionally, fishing nets and aquaculture in the part of the Lake in Albania should be removed.

- Close collaboration between the Ministry of Environment and the Hydrobiological Institute in North Macedonia and regular monitoring of water quality in critical areas like the Crn Drim River and St. Naum springs are essential. Establishing comprehensive transboundary collaboration between Albania and North Macedonia for monitoring the water level, the water quality, and biodiversity is paramount.
- Active dialogue and communication between stakeholders and the Ministry of Environment should be maintained to ensure effective management practices.
- Industries with the potential to pollute the surface or the groundwater should be identified, and their operation in the Lake Ohrid watershed should be prohibited.
- Efforts should be made to relocate and decontaminate the Bukovo landfill.
- Artificial modifications of rivers should cease, except in cases where a clear flood risk is demonstrated that cannot be mitigated by habitat restoration or other solutions.

1.2.10 Review and assessment of the state of conservation of the Lin peninsula

➤ *Lin peninsula: Mosaics, Basilica Shelter, village (Albania)*

The specialised institutions of the former Ministry of Culture, now merged into the Ministry of Economy, Culture and Innovation, have been working on a normative act to protect Lin Village and its peninsula as a cultural landscape according to the Law.

Preliminary documentation that forms the basis for the protective designation has been shared by the State Party for the purposes of the mission. The documentation of individual buildings is detailed and considers history, construction techniques, and building materials. On the other hand, in the currently submitted material, there is little information on the layout of the village, its settlement organisation, or on the historical development of the village and its surrounding landscape. It would be useful if a landscape use and settlement analysis based on visual observations and historical photographic and other iconographic documentation could be prepared to support the designation as a cultural landscape and related measures for the protection of its character.

The mission did not visit the village but visited the archaeological vestiges of the paleo-Christian triconch church on the top of the Lin promontory. The unfinished concrete church built some time ago (it was in that location already at the time of the WHC-ICOMOS-IUCN scoping mission in 2012) is still in place. The building encroaches upon the perception of the archaeological site and on the view from and towards the peninsula. The ministry responsible wants to demolish it, but this is a sensitive issue with the local priest and community, who have a church in the village of Lin at lake level but wanted to build one near the historic church.

The specialised institutions for the protection of cultural heritage aim to build a permanent shelter for the remains of the paleo-Christian church. This would allow them to remove the protective stratum covering the mosaics (a thick layer of sand on non-woven fabric) and facilitate access to the mosaics by visitors. No project proposal was shared with the mission, who noted the high visual sensitivity of the promontory and the challenges that the design of such structure would pose. Any preliminary design proposal in that direction will have to be shared with the World Heritage Centre for review by the Advisory Bodies before any irreversible decision is taken.

Nevertheless, the protection and conservation of remains of the Church and the 6th-century mosaics remain a matter of concern as these formed the main basis for the justification of cultural criteria for the part in Albania of the transboundary property. At the time of inscription, the Committee recommended that the State Party strengthen protection at Lin church as a matter of urgency, and appoint designated personnel for the management of Lin church, Lin village and Lin Peninsula, which was suffering from illegal constructions. A maintenance plan and a conservation plan for the uncovered archaeological structures should be devised.

Five years on, it appears that little has been done to improve the conservation of the archaeological remains, nor have the management recommendations been properly addressed. Appointing a local person to open the site to visitors and basic upkeep is a step forward but is not sufficient. A specific

plan for conservation and regular maintenance has to be devised and implemented. It is recommended that this is added to the Strategic Recovery Plan as a priority action. It is also recommended that such conservation management plan specific to Lin Church archaeological area be transmitted to the World Heritage Centre for review by the Advisory Bodies.

1.2.11 Assessment of actions and measures taken to protect existing and possibly undeclared archaeological sites that may be threatened by infrastructure development in the property and its buffer zone

➤ *The archaeological discovery in the Old City of Ohrid*

The mission visited a recently uncovered early Christian basilica in the old city of Ohrid and other archaeological structures – remains of walls covered with murals - discovered in its vicinity. Ideas about the valorisation of these discoveries have been discussed. The mission suggests the representatives of the organisations responsible for the protection and enhancement of cultural heritage ensure the protection and preservation of the newly discovered elements and undertake research about how archaeological vestiges in dense and still functioning urban fabric have been preserved, protected and enhanced in similar contexts. The mission further advises that any project proposal to address this and adjacent archaeological area be submitted to the World heritage Centre before decisions are made that may be difficult to reverse.

➤ *The Mautsker site*

The World Heritage Centre has been receiving third party information regarding the possibility of undertaking constructions at the Mautsker industrial zone, an area located in proximity of the Hermelea archaeological complex. The State Party of North Macedonia has reported that the archaeological complex named 'Hermelea' situated near the urban planning scope (Industrial zone –Mautsker) was designated as cultural monument under Decision No. 07-344/1 dated 04/08/1998 by the then Institute for the Protection of Cultural Monuments and National Museum in Ohrid. Because of the above designation, and in conformity with Article 67 of the Law on Protection of Cultural Heritage, the Institute issued an opinion to the Municipality of Ohrid emphasizing the necessity of having an archaeologist present during earthworks carried out within the specified planning scope with the aim of recording, documenting and taking any necessary measures in case any archaeological remains were to be discovered.

Issue 2: Assessment of progress made in revising the Strategic Recovery Plan for the property

2.1 Progress made between the 2022 and the 2024 versions

The Strategic Recovery Plan has been prepared in 2021-2022 and then revised taking partly into account the comments provided by ICOMOS via a Technical Review. The Plan has been significantly strengthened since its first version.

The mission met the members of the Drafting Team from North Macedonia to receive an explanation of the work done to update the Plan. No member of the Drafting Group from Albania was present.

To ensure the implementation of the Strategic Recovery Plan by all institutions involved, the role of the Commission for Managing the World Natural and Cultural Heritage of the Ohrid Region has been given a stronger role in implementing the Plan and moving actions forward. The Commission is also responsible for coordination and quarterly implementation monitoring, with deadlines for each institution to present information and monitoring conclusions. The Commission will inform the government on which measures should be implemented, and the government will issue the tasks for each institution. The government convened an emergency session in September 2023, which identified 18 emergency measures requiring immediate action. The government instructed the responsible institutions to implement these measures. An assessment of potential risks in implementing measures has been added, with accompanying mitigation measures. However,

budgeting of actions was not prepared as it was considered that costs could vary over time and would need to be reassessed as the action was implemented. Indicators for monitoring the implementation of the actions have been included and the bodies responsible for implementation and monitoring have been clarified.

The mission considers that the working group in North Macedonia did an excellent work in updating and strengthening the Strategic Recovery Plan, particularly regarding the governance mechanisms to ensure prompt implementation and monitoring. The clarifications provided during the meeting on the choices made are clear and can be overall supported, exception made for a few points that are presented below. The Strategic Recovery Plan needs to be now definitively approved and its Actions implemented.

2.2 Remaining challenges and further recommended improvements

The discussion of the updated Strategic Recovery Plan took place only in the presence of the team of the Republic of North Macedonia, suggesting that it may not have been the result of genuine transboundary cooperation. Several activities in the Action Plan of the Strategic Recovery Plan, i.e., those related to tourism and communication, do not seem to belong specifically to recovery and could probably be removed or reduced to those actions indispensable for the recovery of the property. Finally, the need to coordinate coastal master planning efforts across the entire lakeshore indicate deficiencies in decision-making processes.

The Mission notes that the legal status of the Strategic Recovery Plan and the governance arrangements for its implementation are clear for North Macedonia, but not for Albania. This lack of clarity needs to be addressed as soon as possible, otherwise there is a clear risk that the plan will not be implemented.

The Mission also considers it important to ensure that the Commission for Managing the World Natural and Cultural Heritage of the Ohrid Region in the Republic of North Macedonia plays a liaison role with all ministries on behalf of the Prime Minister to ensure smooth resolution of any problems, bottlenecks or blockages in the implementation of the Strategic Recovery Plan. The Drafting Team includes representatives of national institutions and independent experts: while this is relevant, it would be useful to extend the group work to include representatives of municipalities.

It is essential that the Recovery Plan is approved with governmental decision or, in any case, at the highest decision-making level also in Albania to guarantee that its provisions and measures are robust governance arrangements and to ensure that measures to be implemented are promptly acted upon.

For the implementation of the plan, it is recommended that representatives of the local administrations be included in the team to ensure that the objectives of the Strategic Recovery Plan are understood and that they actively participate in its implementation.

The mission also notes that for the Republic of Albania the status of the Strategic Recovery Plan as well as the governance arrangements for its implementation are unclear. Its status must be raised, and the State Party must commit to the implementation of its measures by the Government and by the relevant self-governing territorial entities.

The mission further considers that an outline of the budget needed for implementing actions that are indicated as urgent, short-term, and continuous should be prepared, with the collaboration of all responsible institutions and become an annex to the Strategic Recovery Plan. Outlining the indicative budget required will be essential for budget planning and donor seeking. The mission finally notes that to facilitate the monitoring of the progress being made in implementing the plan, it would be important to include thresholds to be met within a certain timeframe (e.g., nr. detailed plans revised and approved by a defined timeframe, or nr. illegal structures dismantled and site rehabilitated by defined timeframe).

Issue 3: Assess the overall state of conservation of the property and evaluate factors and conservation issues that could potentially impact on its Outstanding Universal Value, including its conditions of integrity, protection and management

3.1 New interventions and development projects in the property of buffer zone

➤ *Gorica North project (North Macedonia)*

Gorica North is the name of the 17.05 ha large area bordering the Studenčišča Marsh to the south. The area is planned to become a tourism settlement with multiple accommodation constructions, with 68% of the area designated for urbanization according to the Gorica North Urban Plan. The Mission considers that the State Party should urgently provide the World Heritage Centre with information and all existing documentation and impact assessments, if any.

This area, adjacent to the Studenčišča Marsh, serves as an important buffer zone for the highly fragmented and fragile wetland, protecting it from adverse impacts of development on its functionality. Because of its role, the area known as Gorica North should be preserved and not allowed to be developed. In fact, some parts of Gorica North could potentially be restored to extend the wetland enhancing its ecological function. This area is a vital terrestrial habitat within the Lake Ohrid Wetland of International Importance under the Ramsar Convention and supports several threatened species, including the European pond turtle (*Emys orbicularis*) and the Macedonian crested newt (*Triturus macedonicus*).

Gorica North Urban Plan aims for tourism development but lacks an assessment of its potential impacts on the neighbouring Studenčišča Marsh, which is part of the Lake Ohrid Wetland of International Importance under the Ramsar Convention, and awaits protection at the national level for its natural significance.

The mission recommends conducting a thorough impact assessment of the Gorica North Urban Plan on Studenčišča Marsh to identify potential risks and mitigate adverse effects on the wetland ecosystem.

Opportunities for restoring parts of Gorica North should be explored to extend Studenčišča Marsh, considering ecological restoration techniques to enhance biodiversity and habitat connectivity.

Implementing robust conservation measures to safeguard Studenčišča Marsh and its surrounding areas is crucial. This includes habitat protection, monitoring of threatened species, and enforcement of environmental regulations.

Finally, fostering collaboration between relevant stakeholders, including government agencies, local communities, and conservation organizations, is necessary to collectively work towards the preservation and sustainable management of Studenčišča Marsh and Gorica North.

➤ *Construction of a Hotel on Gorica (North Macedonia)*

On the wooded hill known as Gorica, another building site could be seen in the distance by the mission while approaching the city of Ohrid. This is the construction of another hotel in an area that was originally wooded but in which tourism facilities have been progressively built. The construction of this new complex was not notified to the World Heritage Centre before decisions were made, as requested by paragraph 172 of the Operational Guidelines.

The mission considers that information and existing project documentation, including impact assessment carried out, if any, be transmitted to the World heritage Centre for review by the Advisory bodies.

➤ *Large scale building complex in Struga (North Macedonia)*

In Struga, another large-scale complex, much higher than the already tall buildings erected along the lakeshore east of the city centre, has recently been built. The complex is massive and can be seen from Radozhda. The examination of historic aerial photographs available in Google Earth suggest that this was constructed after the 2020 Reactive Monitoring Mission.



Photo 28 Large scale buildings in Struga

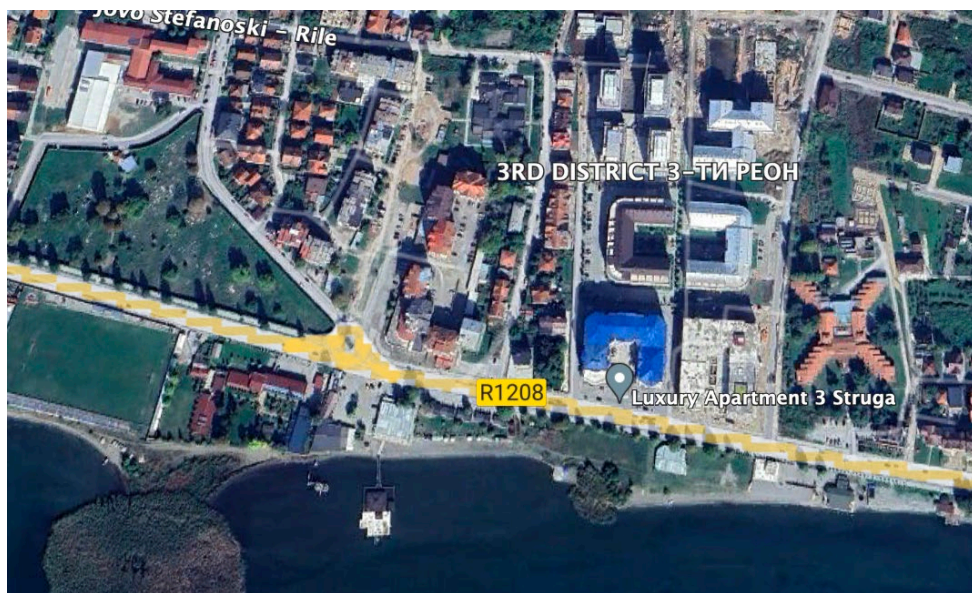


Photo 29 Large scale buildings in Struga

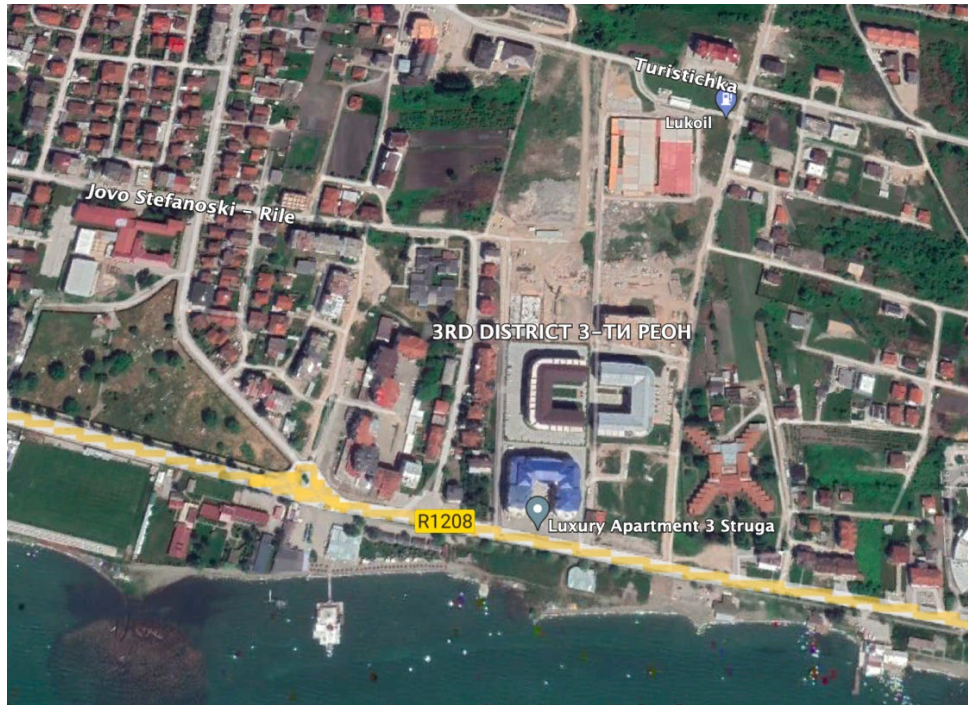


Photo 30 Large scale buildings in Struga

➤ *The revitalisation project for the Pogradec Castle (Albania)*

This project has been included in the joint project proposal COOLTOUR submitted jointly by Struga and Pogradec Municipalities under the Cross-border Programme of the Republic of North Macedonia - Republic of Albania under the Instrument of Pre-Accession Assistance (IPA II) for the period 2018-2020. The project aims to improve the attractiveness of the Pogradec Castle, an archaeological site that has probably been settled since the 5th century BC and has been inhabited for about 1,400 years. The project envisages the cleaning of the site, the landscaping with the planting of trees on the top of the archaeological hill, the construction of a pavilion in the centre of the archaeological site overlooking Pogradec, and the creation of a plaza in its lower part.

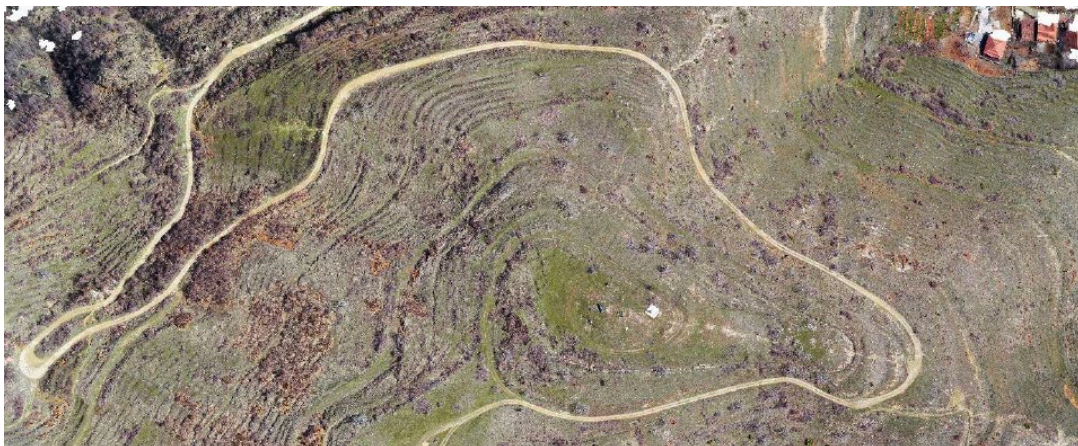


Photo 31 Orthophoto of the current state of the Kalaja Pogradec



Photo 32 Plan of the project on the orthophoto

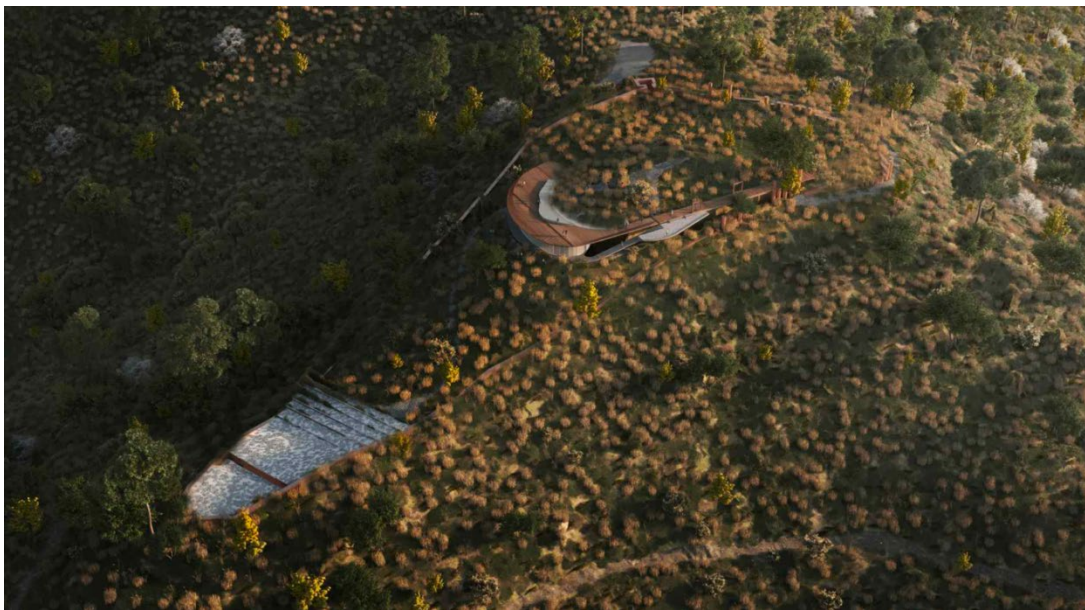


Figure 9 Rendering of the general view of the project and view of the new museum structure



Figure 10 Rendering of the general view of the project and view of the new museum structure

The mission visited the site of the Pogradec Castle and found that only the cleaning of the archaeological remains and the excavations for building the small museum had already begun. The project documentation indicates that the museum is a small semicircular structure partially located below ground by exploiting the slope of the terrain. Large windows open towards the south, favouring the enjoyment of the view over the town of Pogradec. Different paths will be created to visit the area, and a paved plaza will be created on the southern edge of the castle enclosure. A landscaping arrangement completes the project: it is based on the plantation of trees on the top of the hill, currently almost bare, except for some bushes and sparse small trees, and a lighting system. The project has been approved by the National Institute of Cultural Heritage.

The mission considers that the proposed solution is inadequate to preserve the archaeological vestiges. Not only are the foundations of the building likely to interfere with the buried archaeological remains - if any archaeology is found underground, the project will have to be adapted - but the scale of the new building is excessive in relation to the site. It will compete with the archaeological monument. The understandability of the relationship of the archaeological site with its location and with the landscape will be compromised. The construction of this comparatively large structure within the archaeological site for reasons other than the protection of the unearthed structures is not recommended, as the structural elements of the new building may easily interfere with the buried vestiges, which have not been fully excavated.

Again, the focus of the project is on tourist attraction rather than improving understanding of the archaeological site. It is not in line with conservation principles and good practice in conservation, heritage enhancement and interpretation.

The mission recommends that the museum be constructed outside the castle wall enclosure. In addition, the proposed revegetation of the hill through tree plantation may negatively impact the buried archaeology; therefore, it is recommended not to proceed with tree planting.

➤ *Urban development in Tushemisht (Albania)*

The mission noted that in Tushemisht, a large, multistorey building, which did not exist in January 2020, had been constructed on a land plot immediately north of the village's historic core. This construction is completely out-of-scale compared to the built fabric, building plot size, and village articulation.

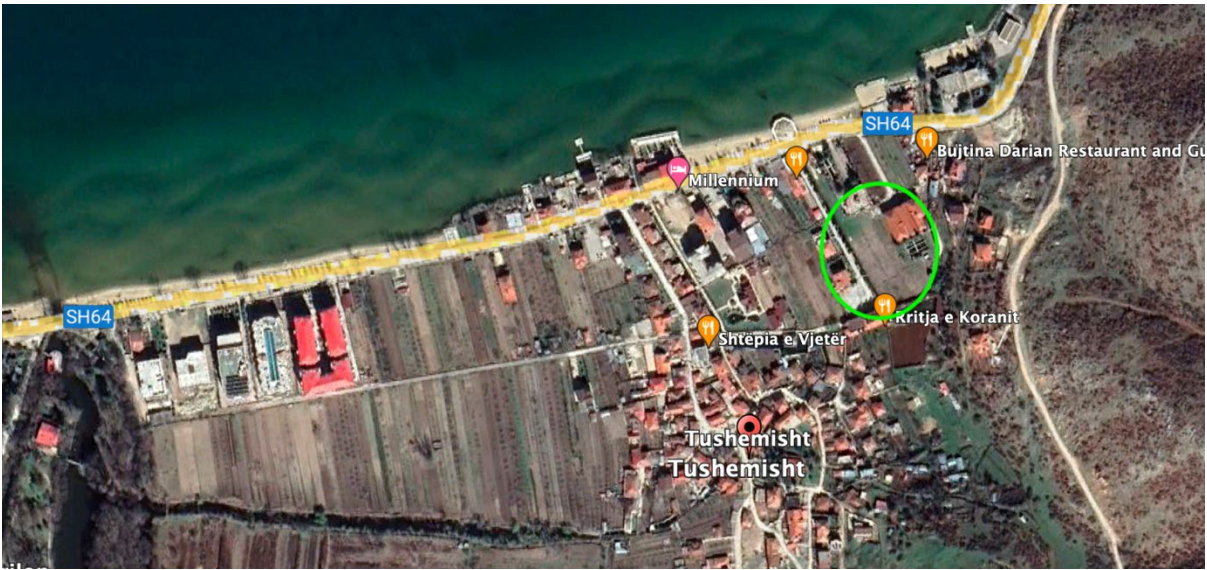


Figure 11 Aerial photograph dated March 2020 in Google Earth

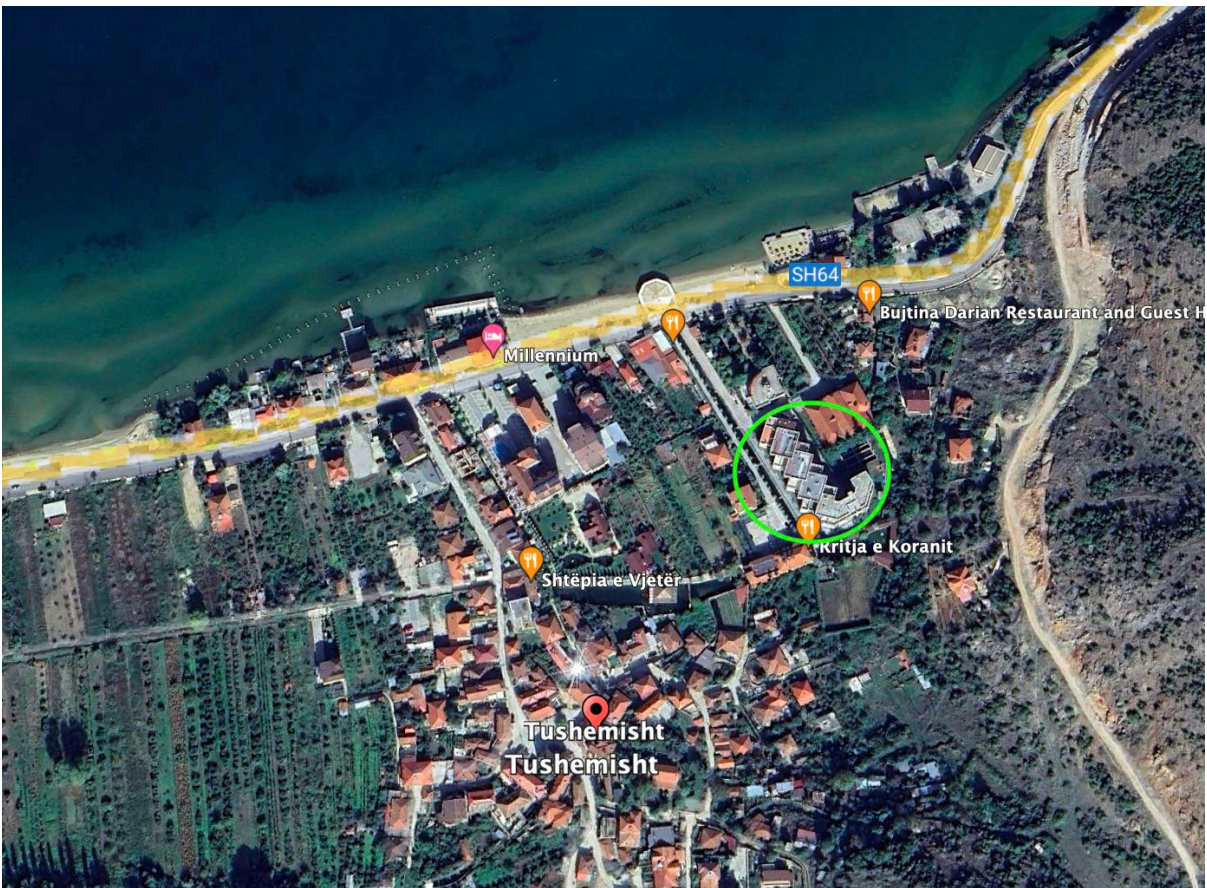


Figure 12 Aerial photograph dated August 2021 in Google Earth



Photo 33 View of the new five-story complex



Photo 34 View of the new five-story complex Not only is the scale much larger than other existing buildings, including new ones, but the building also occupies almost all the building plot, resulting massively incumbent upon the nearby constructions. The colours are also inappropriate for the village setting.

It is evident that, despite the property's vulnerable conditions and the threats already identified and deriving from haphazard urban development signalled in the 2020 RMM report and several World Heritage Committee decisions, development trends continue without adequate management and protection measures adopted by the responsible institutions.

The Mission considers that a moratorium on new construction should be imposed on the side of the property in Albania, particularly along the coastal zone (300 metres from the coastline), and that a review of all building permits issued prior to the approval of the GPL and not yet implemented should

be undertaken as soon as possible in order to assess the potential impacts of unplanned urban development yet to be built and to adopt mitigation and remedial measures.

➤ *Implementation of the masterplan of the Drilon Waterscape Park (Albania)*

The mission visited the area between Drilon Springs and Tushemisht and saw ongoing building development. The Project occupies a lot of land in the still rural area immediately adjacent to the canal connecting the Tushemisht spring system with that of Drilon. Timber structures were under construction and the visualisation of the project on site seems aligned with the design of the masterplan for Drilon. This means that the statement presented by the developer of Drilon Springs that those were only indications for future development with no correspondence to development initiatives is incorrect. Development following the provisions of the master plan is already occurring and it is likely to continue. The mission notes that the State Party has failed to comply with the relevant 2020 RMM recommendations and the World Heritage Committee decisions, which has led to new development in an area very sensitive due to its proximity with Drilon and Tushemisht spring system, an important attribute of the hydrological system of Lake Ohrid.



Photo 35 Timber structures under construction Drilon Waterscape Park project



Photo 36 Timber structures under construction Drilon Waterscape Park project



Photo 37 Timber structures under construction Drilon Waterscape Park project



Photo 38 Timber structures under construction Drilon Waterscape Park project

3.2 *Project ideas still in the conceptual stage*

➤ *Formula 1 project (Albania)*

While many negatively affecting factors and threats are still pending on the property as they have not been clearly and adequately addressed by the States Parties, the proposal to host the Grand Prix of Albania for motor aqua bikes in July 2024 was discussed in the media as early as September 2023. During the meetings with the Albanian authorities, the mission received assurances that no such event would take place in Lake Ohrid. The mission has received written confirmation that the Aquatic Formula 1 race at Lake Ohrid has been abandoned.

The mission emphasises that the construction of the requisite infrastructure to host the international event would have an irremediable negative effect on the World Heritage status of the Lake Ohrid Region. Consequently, this project cannot be permitted to proceed. Should this event, or any similar one in terms of resonance, attendance, and infrastructural arrangements, take place, its negative impacts would further exacerbate the already extremely vulnerable conditions of the property's OUV and its underlying attributes.

➤ *Development in Pogradec (Grand Meliá hotel) (Albania)*

The World Heritage Centre has received third-party information on a project of a large-scale hotel complex in Pogradec. This is in the form of a video illustrating the development concept: a multi-volume (some 7 buildings) and multi-story complex of 10 floors average with a higher 25-storey tower, with a helicopter landing platform on top of it. The video suggests that the hotel complex relates to the Grand Meliá hotel chain, already present in Albania in Tirana, Durrës and Velipoja.



Figure 13 Rendering of development concept in Pogradec

The mission asked for clarifications about this video during the mission, but the local authorities did not seem aware of any concrete project proposals. The World Heritage Centre requested clarifications from the State Party on this project, and the Municipality of Pogradec replied that no request for such a development has been received. The mission considers that the scale, height and architectural language of the envisaged complex are all incompatible with the scale of the city of Pogradec and of the other hotels and post-communist-era tall buildings. It would radically change the appearance of Pogradec and its relationship with the Lake, thereby negatively impacting on the “exceptional harmonious ensemble” formed by the urban structures along the coast of Lake Ohrid, “which is one of the key features that make this region truly unique”. In the event that this concept is confirmed as an actual development proposal, the negative impacts would further exacerbate the already extremely vulnerable conditions of the property, constituting a danger in accordance with Art. 11.4 of the World Heritage Convention and paragraphs 179 and 180 of its Operational Guidelines.

3.3 *Overall state of conservation of the property*

Lake Ohrid continues to support high diversity of endemic and relict freshwater flora and fauna, yet it faces an increasingly dire array of threats. The water ecosystems and coastline of Lake Ohrid are integral components of its World Heritage Site status. Eutrophication, primarily from sewage contamination, stands as a critical factor contributing to the decline of endemic fish populations. Additionally, nutrient uptake by the littoral ecosystem exacerbates eutrophication. Water quality parameters are subject to several factors: defective sewage systems, the absence of wetlands to mitigate nutrient inflow, declining shore-zone functionality, and agricultural activities in the surrounding areas.

Particular concern is the decreasing populations of fish and birds, along with the diminishing diversity of species dependent on wetlands. This conclusion stems from discussions with local residents,

independent researchers, experts, and non-governmental organizations. These interviews are supported by official reports, such as those from the Hydrobiological Institute in Ohrid, which highlight broader environmental impacts and trends, pointing to the insufficiency of current management strategies.

As of 2023-2024, the endemic fish populations in Lake Ohrid are facing significant challenges. Species such as the Ohrid trout (*Salmo letnica*) and the Ohrid bleak (*Alburnus ohridanus*) have shown population declines due to overfishing, habitat degradation, and pollution. A 2023 report by the Hydrobiological Institute of Ohrid indicates a 15% decrease in the Ohrid trout population over the past five years. Additionally, studies published by the Ministry of Environment and Physical Planning of North Macedonia highlight increasing pressures from invasive species, further threatening native fish populations.

Bird populations around Lake Ohrid also reflect mixed trends. While some species like the Dalmatian pelican (*Pelecanus crispus*) have seen stabilized due to conservation efforts, others are declining. The Albanian National Environmental Agency's 2024 bird survey reports a 10% decrease in the population of the Ferruginous duck (*Aythya nyroca*), attributed to habitat loss and water pollution. These findings, supported by the Ministry of Environment and Physical Planning of North Macedonia's annual reports, underscore the need for continued monitoring and enhanced conservation strategies to protect the unique biodiversity of Lake Ohrid.

Concerns are further compounded by runoff from expanding road networks, eroded hillsides, increased wildfire risks in urban-wildland interfaces, illegal burning practices, and artificial modifications. The continuous decline in fish and bird populations, as well as the threats to wetlands-dependent species diversity, underscore the inadequacy of current and proposed management measures. Biomonitoring efforts remain inadequate, while the ongoing development of a management plan, including zoning, is still in progress. Fragmented coastlines, disturbed riparian zones, and nature-subordinate activities pose significant challenges in meeting IUCN standards and impact the property's OUV.

Coordination between the management of Lake Ohrid's parts in North Macedonia and Albania is insufficient, hampering effective conservation efforts. Urgent conservation measures are imperative to address the alarming declines in biodiversity. Despite the creation of protected areas within Lake Ohrid, shortcomings persist in their management, and the existing and proposed protected area categories fail to fully reflect the Lake's significance as a transboundary World Heritage Site. Furthermore, the massive development of lake areas underscores the pressing need for a comprehensive conservation and wetlands restoration plan. Given its status as a climate refuge in a region facing escalating temperatures, the importance of the Ohrid-Prespa region cannot be overstated.

Although some local improvements can be seen, a number of important threats to the attributes of the OUV identified in previous missions have not been addressed and new ones are emerging.

In Albania, implemented measures include, for instance, the removal of the fish farms from Drilon Springs and of temporary metal or timber structures along the lakeshore. In North Macedonia, the development for Ljubanishta 1 and 2 has been cancelled, the works for the redirection of Sateska River have been completed, although redirection of the river has not yet happened, and the construction of the sewerage system is progressing.

At the same time, most of previous missions' recommendations have not been addressed, e.g., changes in the location and plans for communication infrastructures, designation of Studenčišča Marsh as nature park and of Lake Ohrid as monument of nature at the national level, carrying out cumulative HIAs to assess impacts of implemented, authorised and planned developments, and new ones are emerging, mostly related to uncontrolled and unsustainable urban development from private sector initiative. These are exemplified in the previous paragraphs. The threats from known infrastructure projects, namely the construction of road and railway Corridor VIII along the coastal strip between Kalishta, Elen Kamen, Radozhda until the North Macedonia-Albania border, along one of the last almost unspoiled coast lake stretches, have not been permanently removed. Although North Macedonia authorities had verbally committed during the mission to fulfil the World Heritage Committee's decisions, this commitment has not been formally confirmed in writing regarding the

diversion of the railway and the road from the coastline. Albania, for its part, has formally reaffirmed its intention to complete the rail border crossing at Lin in 2024. In addition, the project is currently considered eligible for funding by investment finance institutions, bringing this potential threat one step closer to reality. For the section of the A2 motorway under construction between Trebenishte and Struga, a number of additional connections with local roads are now being considered, with the risk of further artificialisation of the soil and depletion of the rural character of the plain, which contributes to the understanding of the OUV of the property.

With the approval of the Management Plan for the Natural and Cultural Heritage of the Ohrid Region, the moratorium on new construction in North Macedonia has been lifted, and thus construction activity in Ohrid has resumed vigorously, even in areas where no further development should have been allowed, such as at the southern border of the marsh (Gorica North project) and on Gorica Hill (Gorica 3 project), or along the hard promenade between the lakeshore and the Studenčišča marsh (to be built in 2019 - 2020), where new tourist facilities and terraces encroaching on the Lake are being built.

The court litigation for the Hotel Lagadin ended in favour of the developer; therefore, to demolish it, the Ministry of Culture should have paid damages and decided to withdraw. The construction is therefore now considered legal and can be completed. The Commission for the Natural and Cultural Heritage of the Ohrid Region has not been functioning regularly in 2024 – the mission got information that it did not meet between February and May 2024 – and this may easily lead to ambiguous situations regarding the legal status of development projects, that can result in outcomes similar to Hotel Lagadin.

A new large-scale building in Tushemisht, Albania, was built after the 2020 Reactive Monitoring Mission. Although in the buffer zone, Tushemisht is a small settlement grown around natural springs connected to the Drilon Springs system, which offers an idea of the rural character, now being progressively eroded, of the villages around the Lake. The master plan for the Drilon Waterscape Park, whose development provisions the 2020 Reactive Monitoring Mission called for to be partially cancelled, has begun to be implemented in the very area that the Mission called for to be withdrawn from development, with new buildings going up in what is still a rural area. The diversion road between Pogradec and the Albanian – North Macedonian border is planned to run adjacently to Drilon Springs main outlet, thus encroaching upon them. A beautification project – as it is proposed – will not diminish the negative impacts of this proximity, both in terms of environmental pollution (spillover from cars) and visual encroachment.

The inventory of illegal buildings has been carried out, but the focus has essentially been on legalising these buildings, rather than defining criteria for assessing their negative impact on the OUV and setting priorities for their full or partial demolition or mitigation measures to be implemented. Thus, instead of prioritising remedial measures to restore the integrity of the property and discourage illegal behaviour, the legalisation of illegal constructions will not improve the situation unless clear thresholds of what can and cannot be legalised are established in advance to guide the process.

The temporary structures encroaching into Lake Ohrid have been dismantled only in Albania; in North Macedonia, the process started but has not yet been completed. Meanwhile, new ones are being built, including in sensitive areas.

In North Macedonia, the revision of planning instruments to make them compliant with the Management Plan is not completed; however, several detailed plans have been approved, including proposed modifications to the expired General Urban Plan provisions. No cumulative impact assessment has been carried out so far, despite the requests of the 2020 Reactive Monitoring Mission and the World Heritage Committee. Meanwhile, the moratorium on construction has been lifted, and building development is ongoing, diverging from the Committee's recommendations on the matter. At the same time, the preparation of detailed conservation plans for the 19 complexes forming the historic centre of Ohrid is far from being completed and interventions therefore continue with a piecemeal approach.

The above challenges call for a convinced transboundary cooperation, based on transparency, communication and coordination of actions. Transboundary cooperation (in the field of biodiversity protection) between North Macedonia and Albania should be a priority for the preservation of the

cross-border World Heritage property, which forms with Lake Prespa and Mount Galichica one indivisible hydrological and ecological whole. Many common problems, such as pollution and habitat degradation, require joint efforts to ensure long-term sustainability and conservation. Despite its World Heritage status, the property faces significant challenges in transboundary cooperation. Reported transboundary cooperation appears limited to events, with insufficient progress in protection and coordinated management efforts. On both sides of the Lake the focus on cross-border tourism appears to overshadow conservation efforts, as indicated by the emphasis on a tourism project called COOLTOUR in the States Parties' 2024 state of conservation report. While addressing the shortcomings of tourism is essential, the effectiveness of such strategies in maintaining outstanding universal value depends more on their alignment with the principles of sustainable tourism than on promoting mass tourism.

Proposed conservation measures, such as the establishment of no-fishing zones and the protection of biodiversity hotspots, still lack the necessary legal framework for effective enforcement. Fragmented shorelines and disturbed riparian zones further hinder efforts to meet IUCN standards and impede the Lake's ecological integrity.

The approach to international protection is different in the Republic of North Macedonia and in Albania: for instance, the part of the Lake in North Macedonia is designated as a Ramsar Site, whereas Albania's part is not included in this network. In Albania, Mount Galichica lacks a national park designation, causing numerous conservation challenges. Extending the buffer zone of the World Heritage property to Lake Prespa, which would be important for conservation efforts, remains unresolved.

The mission notes that, in North Macedonia, inappropriate development along the lake coastline over the decades has negatively impacted on the values of the property, but the complex conservation challenges faced by North Macedonia do not seem to assist Albania in drawing lessons on the threats deriving from an excessive focus on tourism as a major development form. Whilst excessive building pressures began in North Macedonia possibly earlier than in Albania, over the last 15 years, the side of the Lake in Albanian has experienced a progressively increasing urbanisation and building development, large scale and tall buildings have been transforming beyond recognition the coastline in Pogradec. Although Pogradec, the lake landscape and the villages dotting this landscape are in the buffer zone, they are functionally important as a support to the property and its protection and contribute to the understanding and appreciation of the OUV of the property.

In 2020, the Reactive Monitoring Mission offered a set of measures with identified priorities and timeframe for implementation as assistance for the States Parties to act promptly to redress some of the most urgent threats to the integrity of the property: too few of them have been fully implemented, whilst most are progressing very slowly or have not been addressed. A summary assessment of the advancement in implementing World Heritage Committee Decisions and Recommendations of the Reactive Monitoring mission is made in the following section and detailed analysis is provided in the table of the Mission Recommendations.

V. CONCLUSIONS AND RECOMMENDATIONS

The mission notes that the state of conservation has not comprehensively improved since the 2020 Reactive Monitoring Mission, and negative factors affecting the attributes that convey the Outstanding Universal value of the property are still active and mostly not fully known or controlled.

Despite steps in the right direction, and some local improvements in the implementation of necessary measures for safeguarding the attributes that convey OUV of the Natural and Cultural Heritage of the Ohrid Region, the property continues to face several threats, which are escalating.

The water ecosystems and coastline of Lake Ohrid are integral components of its World Heritage Site status. Eutrophication, primarily from sewage contamination, stands as a critical factor contributing to the decline of endemic fish populations. Additionally, nutrient uptake by the littoral

ecosystem exacerbates eutrophication due to several factors: defective sewage systems, the absence of wetlands to mitigate nutrient inflow, declining shore-zone functionality, and agricultural activities in the surrounding areas.

Runoff from expanding road networks, eroded hillsides, increased wildfire risks in urban-wildland interfaces, illegal burning practices, and artificial modifications further compound concerns. The alarming declines in fish and bird populations, as well as the loss of wetlands-dependent species diversity, underscore the inadequacy of current management measures. Urgent conservation measures are imperative to address the decreasing population of fish and birds. Biomonitoring efforts remain inadequate, while the ongoing development of a management plan, including zoning, is still in progress.

Despite the creation of protected areas within Lake Ohrid Region, shortcomings persist in their management, and the existing and proposed protected area categories fail to fully reflect the Lake's significance as a transboundary World Heritage property. Furthermore, the large-scale development around the Lake, particularly near the main urban centres such as Ohrid and Struga, in North Macedonia, and Pogradec (in the buffer zone), in Albania, has been eroding the qualities of 'the exceptional harmonious ensemble, which is one of the key features that make this region truly unique'⁷. Inappropriate and unsustainable urbanisation and tourism infrastructure development have been reducing the understanding and appreciation of the qualities that supported the long-lasting development of ecclesiastical life along the shores of the Lake. The unique ancient urban entity of the old town centre of Ohrid has been negatively affected by innumerable interventions that cumulatively have been eroding its preservation and authenticity.

Coordination between the management of Lake Ohrid's parts in North Macedonia and Albania is insufficient, hampering effective conservation efforts.

The measures requested by the World Heritage Committee since 2014 and by the 2017 and 2020 Reactive Monitoring Missions have only been very limitedly fulfilled, whilst several are very slowly implemented and some not addressed at all, preventing the state of conservation of the property from improving and entering into a positive trend of recovery of its integrity.

The mission observes that, in North Macedonia, there seems to be a good understanding of the gravity of the situation, at least among the technical staff of State agencies for natural and cultural heritage protection and conservation. However, a cohesive approach from high-level decision-making actors at the national and local levels and a proactive recognition of the criticality of the conservation conditions of the property are missing. Intentions and willingness to redress the deteriorating conditions of the World Heritage property are uneven and not widely shared among decision-makers, powerful development-oriented stakeholders, and interest groups. Therefore, the agenda of unsustainable forms of development, based on construction, artificialisation of the soil and encroachment on places with the highest density of natural and cultural attributes of OUV, prevails over strategies that are more sustainable and compatible with the World Heritage status and other international designations of the property.

In Albania, the excessive focus on the economic profits that can be drawn from the existence of places with natural and cultural values obfuscates the full and earnest appraisal of the extreme vulnerability of the OUV of the property and its integrity. This lack of awareness, in turn, prevents the creation of a critical mass of high-level willingness, intent and planning for the necessary change in direction.

The difficulty in acknowledging the extremely vulnerable situation of the property by key decision-makers does not allow for negative trends to be redressed and is likely to prolong and augment the vulnerability of the attributes conveying the OUV of the Natural and Cultural Heritage of the Ohrid Region and their integrity and authenticity.

The conclusions of the 2020 Reactive Monitoring Mission confirmed the threats and negatively affecting factors detected by the 2017 Reactive Monitoring Mission: these conclusions remain valid

⁷ Criterion (i) of the Retrospective Statement of Outstanding Universal Value.

after seven and four years. The conclusions and considerations on the extremely vulnerable state of conservation made in 2017 and 2020 by the two preceding reactive monitoring missions will not be repeated here but are to be considered as an integral part of this mission report.

For the reasons outlined above, the mission concludes that progress is too slow and too weak. Divergent agendas of the different actors at the state level (especially in Albania) or at the local level (both in Albania and in northern Macedonia) are slowing down and contradicting the progress of remedial actions. The property remains highly vulnerable due to poor implementation of the legal framework for protection and planning, and significant management problems at both national and transnational levels.

The serious deterioration of key attributes that convey the property's OUV, and of the urban, rural and natural landscapes of the property, caused by threats already identified in 2020 – inappropriate interventions, negative impacts of urban development and inappropriate spatial planning, eutrophication of the lake, large-scale infrastructure and other project proposals – is causing irreversible degradation unless decisive action is taken. This may result in the property losing its Outstanding Universal Value in the short to medium term. **The property therefore fulfils the criteria for inscription on the World Heritage List in Danger, as outlined in Article 11.4 of the World Heritage Convention and in paragraphs 179 and 180 of the Operational Guidelines for Implementation of the World Heritage Convention.**

The direction undertaken with the development of the Strategic Recovery Plan is supported by the mission, but the process set up appears too fragile, not equipped with the necessary human and financial resources for its implementation and lacking the necessary joint transboundary support at the highest decision-making level.

It is essential that the Strategic Recovery Plan is given all the necessary institutional support, professional, human, financial and organisational means to ensure its steady implementation to assist the property to recover from the ascertained and potential dangers it has been facing, at least since 2020.

Recommendations of 2020 Reactive Monitoring mission, implementation progress and 2024 Reactive Monitoring mission new recommendations

Note: In blue appear the 2024 Reactive Monitoring mission new recommendations

In light grey appear the 2020 recommendations or parts of them that are no longer pertinent

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
1. Recommendations concerning potential threats according to paragraphs 179 and 180 of the <i>Operational Guidelines</i>:			
1.a Permanently abandon plans for a marina at Studenčišča Marsh and remove from any planning instruments, zoning provisions allowing any form of development, including leisure zones, at Studenčišča Marsh;	Immediate	Inadequate / Plans for a marina at Studenčišča Marsh are still under consideration - plans should be removed from all planning instruments.	Immediate
1.a.1 Explore the possibility of extending the Studenčišča Marsh protected area into the wider surrounding region, including areas such as Gorica Sever and damaged sections of the wetland designated for restoration, with the aim of enhancing conservation efforts and safeguarding biodiversity in a larger ecological landscape;		New recommendation	Immediate
1.b Permanently abandon plans for building developments along the Lin lakeshore and on top of Lin Peninsula, including the completion of a church building near the archaeological remains of the early Christian church, as well as between Pogradec town and Tushemisht. This implies to: <ul style="list-style-type: none"> i. Remove from the Pogradec General Local Plan the development zoning areas along the Lin lakeshore and on the top of the Lin Peninsula (PG/HU63 and PG/HU70); ii. Remove from the Pogradec General Local Plan the development zoning area between Pogradec and Tushemisht (PG/BU111); 	Immediate	Not implemented - Planning provisions require prior submission of projects to the World Heritage Centre.	Immediate
1.c Permanently remove from the tourism development project at Drilon springs all provisions for fish farming , building options in the agricultural plains along the springs, construction of the Lake Museum or any other building on top of the hill, and significantly reduce the areas eligible for	Immediate	Implemented: Fish farming is not included in the Drilon project. Not implemented: Drilon masterplan and project approved as it was shown in 2020	

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
building development, by excluding construction in the plain near the water course linking Tushemisht and Drilon spring main water body, explore options to relocate part of the proposed development in the hinterland of Tushemisht or in Gurras, where development already occurred;			
1.d Modify the project to repair Quay Macedonia without any further enlargement of the quay into the Lake;	Immediate	Abandoned	
1.e Halt all approval procedures and implementation of Ljubaništa 1 and 2 tourism development projects, and transmit the project documentation to the World Heritage Centre for examination by the Advisory Bodies, including details of the planned wastewater management system and updated visual documentation of the areas²;	Immediate	Abandoned	
1.f Urgently undertake a joint comprehensive comparative study of alternative routes for the railway of Pan European Corridor VIII, including those that do not pass in close vicinity to the lakeshore, and in particular avoiding one of the last well-preserved stretches of the lakeshore on the border of Albania and North Macedonia, and taking into account the alternative suggested by the 2017 Reactive Monitoring mission;	Immediate	Not yet implemented	
1.g Reinstate as a matter of urgency the construction moratorium which is expected to expire in 2020 and revise the Ohrid, Struga and Debrca municipal decisions on the construction moratorium to significantly reduce its exceptions, limiting authorised interventions to ordinary maintenance but excluding from the moratorium the installations of transmission lines up to 35kV and substations up to 10kV, fire protection installations, local water supply and upgrade of the existing sewerage treatment system;	Immediate	Moratorium not reinstated Approval of the Management Plan	Immediate
1.h Take advantage of the uncertainty regarding fund availability and the consequent pending implementation timeframe of highway A2 and:	Immediate	Not yet implemented	Immediate

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
i. verify the possibilities of combining all planned energy (electricity transmission line and gas pipeline) and transportation infrastructure within the North Macedonia side of the property in one single corridor in the Struga plain, in order to avoid the fragmentation of the landscape in the plain, which contributes to the integrity and understanding of the OUV of the property;	Immediate	Not yet implemented	Immediate
ii. explore the possibility to combine highway A2 and the railway in one tunnel, if upgrade of the existing road from Qafe Thane to Struga is not possible, to take advantage of the construction of the tunnel;	Immediate	Not yet implemented	Immediate
iii. Provide the plan for additional proposed road connections between the A2 Trebenishta – Struga section;		New recommendation	Immediate
2. Recommendations to rectify the already implemented and negatively impacting activities / interventions:			
2.a Ensure the closure of fish farms and rehabilitation of affected areas in all water bodies connected with the Lake, especially in the Drilon and Tushemisht springs;	Immediate	Fish farms removed - Rehabilitation still insufficient, especially in Drilon and Tushemisht springs.	Immediate
2.b Close all irregular landfills such as Bukovo, Maucker and Struga, as well as any illegal waste dumping sites within the property, and rehabilitate the affected areas;	Three years	Not implemented yet – 4 years passed	Three years
2.c Complete the demolition of the structures supporting the terraces along the lakeshore in Ohrid town, which at the time of the Mission was only partially carried out;	Immediate	Completed in Albania – Only initiated and then stopped in North Macedonia	Immediate
2.d Speed up the process of demolishing negatively impacting illegal buildings/structures both in North Macedonia and Albania by preparing an action plan with identified priorities and timeframes for demolition with a three-year time horizon. This implies:	Immediate	Inventory prepared – no criteria established for assessing impacts – legalisation is being prioritized over mitigation and recovery	Immediate
i. prioritising for demolition the priorities identified by Galičica National Park and within Ohrid Municipality;	Immediate	Not implemented	Immediate

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
ii. drafting a list of demolition priorities also for Struga and Debrca municipalities;	Immediate	Not implemented	Immediate
iii. compiling an inventory for Pogradec Municipality similar to the one prepared for Ohrid Municipality and proceeding with an assessment of the negative impacts on the OUV of the property, its attributes and its setting to determine the priorities for demolition;	Immediate	Largely implemented - some structures of dismantled fish farms are still not removed. It would be important to update the inventory and address remaining demolition issues.	Immediate
iv. considering the demolition of the negatively impacting structures and unfinished buildings in Lin village;		Not implemented	Immediate
v. speeding up the administrative procedures to achieve the demolition of the unfinished Lagadin Hotel near Ohrid;	Three years	Not achieved – building will remain	
vi. preparing an updated map with demolished illegal buildings and those for which demolition has been proposed;	Three years	Not implemented	Immediate
2.e Urgently complete the removal of the tailings dam and the mining dumpsite at Memëlisht, as well as the area's rehabilitation and the monitoring of heavy metal contamination in soil, water and locally caught fish;	Immediate	Not implemented	Immediate (plan and negotiation with owner)
2.f Evaluate the impacts of former and active mining activity in the surroundings of the property on its OUV and attributes and ensure the permanent closure and remediation of any mining activities proven to have negative impacts;	Three years	Not implemented	Immediate
2.g Mitigate the impacts of the highway Qafe Thane - Pogradec by:		Only limitedly implemented	
i. removing the service road built to facilitate traffic during construction;	Immediate	Removed - but a cycle path was built in its place - with further encroachment into the Lake.	
ii. rehabilitating through environmental engineering interventions the cut of the Falaise near Pogradec to build the 'panoramic tunnel';	Five years (completion)	Not implemented - no design received for comment	Immediate
iii. re-designing the landscaping of the highway, prioritising visual alignment with the natural landscape instead of tree-	Immediate (design)	Not implemented - no design received for comment	Immediate

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
lines, and native tree species instead of conifers and palms;			
iv.preventing any type of edification on the stretches of land between the lakeshore and the highway;	Five years (execution)	Addressed by unsatisfactory solution - provisions in the GUP to refer projects to the World Heritage Centre	Immediate
2.h Restore ecologically sensitive sections of the lakeshore that have been degraded such as the Studenčišča Marsh, including its connection to the Mazjia area , and ensure their connection to the Lake, including removing seasonal tourism facilities and moving them to less sensitive sections of the coast;	Immediate	Inadequate / Improve effectiveness of restoration in degraded parts of the Studenčišča Marsh	Two years
2.i Prevent the construction of permanent structures along the beach adjacent to the new promenade being built at Studenčišča Marsh and that temporary ones are strictly regulated in terms of material used, ease of dismantling, shape, size;	Immediate	Inadequate - Promenade completed / Restore Studenčišča's connection with the water ecosystem of Lake Ohrid	Two years
2.j Carry out within an 18-month timeframe the revision of the uses of the lakeshore in all existing or draft plans taking into account the OUV of the property and its attributes and avoid further degradation of the integrity of the lakeshore, also ensuring that temporary legal structures are dismantled at the end of the tourist season;	18 months (completion)	Rare remnants of undisturbed lakeshore habitats; problematic legal protection and management: identification and protection is needed.	Two years
2.k Halt the construction of Gorica North and Gorica 3 and carry out a heritage impact assessment of the potential impacts of the projects, including the cumulative impacts of existing development on this part of the Lake;		New recommendation	Immediate
2.l Prepare and append to the Strategic Recovery plan a budget outline for urgent recovery measures to be implemented to facilitate fundraising and budget planning;		New recommendation	Immediate
2.m Revise the monitoring system of the Strategic Recovery Plan by including measurable progressive objectives to be achieved over time.		New recommendation	Immediate

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
3. Recommendations to strengthen the management framework and its effectiveness at the transboundary and national levels:			
3.a Raise the profile of the members of the Transboundary Watershed Management Committee to include top-level decision makers to guarantee they are empowered to take high-level decisions and, proportionally, of the members of the Watershed Management Committee Secretariat; guarantee its functionality by involving further human resources from national and local offices; and strengthen and detail the Rules of Procedure of the Committee in order to guarantee its effective functioning;	Immediate	Profile raising implemented Effective functioning still to be achieved Transboundary cooperation still too limited - needs to be strengthened	Immediate
3.b Establish and guarantee the effective functioning of the extended Management Committee for Pogradec Protected Landscape (PPL) envisaged by the World Heritage Supplement to the Management Plan of the PPL, and implement fully the Management Plan and its Supplement ensuring formal endorsement of the latter by all relevant stakeholders;	Immediate		
3.c Give the extended Management Committee for PPL the mandate to prepare an action plan to address the Mission's and World Heritage Committee's recommendations;	Immediate	Partially implemented (Strategic Recovery plan)	Immediate
3.d Ensure the full operationality of the Management Commission for the Ohrid Region in North Macedonia and guarantee that their decisions are communicated to all interested parties;	Immediate	Mostly implemented – regularity of meetings not ensured	Immediate
3.e Ensure that development provisions and zoning proposals that are likely to impact negatively on the OUV of the property and its attributes, including modifications to the zoning of Galičica National Park, are redressed and removed from the revised draft of the Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020 - 2029 (North Macedonia);	Immediate	Mostly implemented	
3.f Approve the Management Plan 2020-2029, enforce it, by, first of all, modifying planning provisions in other plans	Immediate	Approval implemented – Issues related to spatial planning and urban development not resolved	

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
allowing for developments that may have negative impacts on the property, its OUV and attributes, and implement it and support its implementation by allocating adequate human and financial resources and guaranteeing high-level commitment;			
3.g Ensure that the ongoing development of the new Management Plan for Galičica National Park halts timber extraction activities within its territory and reinforces the protection of its forested areas while regulating sustainable tourism activities, and send it to the World Heritage Centre and the Advisory Bodies for review;	Immediate	The mission was unable to verify reports that timber extraction activities had ceased or to assess the effectiveness of the management of the Galičica National Park.	Immediate
3.h Prepare both at the national and transboundary levels an action plan and an implementation calendar of short-, medium- and long-term measures to address all previous World Heritage Committee and Reactive Monitoring Missions' recommendations and integrate this action plan into the respective management plans for the property;	Immediate	Recovery Plan has been drafted but not yet implemented	Immediate
3.h.1 Raise the legal status of the Recovery Plan and strengthen the governance arrangements to ensure its prompt implementation in Albania by all responsible institutional actors;		New recommendation	Immediate
3.i Increase the RAPA and the RDCH staff dedicated to Pogradec and reinforce the dialogue and cooperation among RAPA and RDCH dedicated staff, and municipal technical staff, including the Museum staff;	Immediate	Partly implemented – more dialogue is evident – staff still insufficient	Two years
3.j Establish long-term transboundary cooperation on monitoring the Lake's biodiversity and water quality, and establishing common management actions such as jointly agreed fishing quota.	Three years	Lack of time prevented review of long-term transboundary cooperation to monitor biodiversity, water quality and fishing quotas.	Two years
3.l Ensure that all institutions and administrations involved implement the management activities they are responsible for through appropriate monitoring and accountability mechanisms;	Two years	Addressed through Recovery Plan in North Macedonia To be clarified in Albania	immediate
3.m Consider the introduction for both countries of a tourism tax, its amount being proportional to the hotel class rather than a	Three years	Removed - The tax exists	

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
flat rate, where it does not exist, to be managed locally and to provide municipalities with additional revenue to cover the costs deriving from environmental pressures caused by tourism;			
3.n Dedicate the revenue of the tourism tax to the improvement of the wastewater and waste management systems as a matter of priority.	Five years	Implementation to be reviewed - not clear what the revenue from this tax will be used for.	
4. Recommendations to fully align planning provisions to the OUV of the property and its attributes:			
4.a Assess the negative impacts on the OUV of the property of implemented development provisions of expired General Urban Plans (GUP) for Ohrid, Struga and Debrca, as well as of all other spatial or development plans covering the property or parts of it;	Immediate	Not implemented	Immediate
4.b Assess the potential negative impacts on the OUV of the property of the yet to be implemented provisions of the GUPs, as well as of other existing spatial or development plans, and verify the possibility to cancel or reduce them, on the basis of the considerations and recommendations of all Reactive Monitoring Missions and of the World Heritage Committee;	Immediate	Not implemented	Immediate
4.c Revise / update the GUPs for the municipalities in North Macedonia and the draft General Local Plan (GLP) for Pogradec making them consistent with the aim of preserving the OUV of the property and its attributes; approve and implement them. This includes:	Immediate	Not implemented	Immediate
i. Establish stricter criteria for the development of area PG/HU64 in Pogradec GLP in order to guarantee that any proposal improves the current conditions, characterised by low quality architecture, inappropriate landscaping and non-native vegetation, and excessive tourism structures on the lakeshore;		The recommendation stands - the change in numbering between the draft plan and the approved plan does not allow for verification of implementation.	Two years
ii. Preserve the rare rural areas along the lakeshore, which contribute to the appreciation of the OUV of the property and adapt planning objectives and provisions		The recommendation stands	

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
accordingly, the only exception being the former mining dumpsite of Guri i Kuq (Albania) that can be considered for redevelopment.			
5. Recommendations to strengthen protection of the property:			
5.a Proceed urgently to designate Studenčišča Marsh as a protected area at the national and encourage Lake Ohrid's designation at the international level, including through a possible Ramsar designation;	Immediate	Partially in progress. / Result still inadequate	One year
5.a.1 Identify additional potential protected areas, especially in the coastal area of Lake Ohrid, to enhance the protection and integrity of the property;		Ensure that the territories identified in this way are promptly declared protected in accordance with the relevant IUCN categories.	One year
5.a.2 Implement measures to regulate tourism activities and visits to minimise environmental impacts, particularly around ecologically sensitive areas such as springs and endangered species habitats at St. Naum, possibly through entrance fees for visitors;		New recommendation	Two years
5.a.3 Remove the Ostrovo restaurant, clean the island, and restore the natural habitat;		New recommendation	Three years
5.a.4 Upgrade the wastewater treatment at St. Naum to ensure full functionality and proper discharge of treated water, along with scheduled maintenance and monitoring;		New recommendation	Three years
5.a.5 Establish a regular monitoring protocol for spring parameters using scientific methodology for reliable comparison over time. Management at St. Naum should be aligned with national nature protection laws and the Galichica National Park Management Plan;		New recommendation	Two years
5.a.6 Visitor services impacting on the OUV of the property should be relocated to the periphery of the area or outside the St. Naum complex;		New recommendation	Four years
5.b Implement expeditiously the provisions of the new Law on Cultural Heritage and Museums (Albania), particularly those related to the automatic protection provided to landscape	Immediate	Lin landscape designation underway	immediate

Recommendations		Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
	categories such as coastal zones, rivers, forests and mountains;		Not clear whether automatic protection will be implemented and enforced	
5.c	Proceed urgently to designate the whole Lin peninsula as a protected cultural landscape according to the provisions of the Law on Cultural Heritage and Museums;	Immediate	The preparation of the necessary documents for the declaration has started. The process needs to be accelerated.	One year to finalise the declaration
5.d	Enforce fully the existing legal framework, in particular the current Law on Managing the World Cultural and Natural Heritage of Ohrid Region and proceed with the approval of the new law on the Management of the Natural and Cultural Heritage of the Ohrid Region as soon as possible;	Immediate	In process	Immediate
5.e	Elaborate a plan for inventorying additional immovable cultural heritage objects, including archaeological sites, and implement it;	Three years	Apparently in progress (via Feasibility Study)	Three years
5.f	Monitor and control the discharge of lake waters into the Crn Drim River by North Macedonia power plants company ESM and ensure implementation of best practices in transboundary water management;	Immediate	In progress - Monitoring and controlling of the discharge of lake waters into the Crn Drim River is in process but not adequately	
5.g	Enforce legal provisions to protect native forests, including restoring degraded areas, and take all necessary measures to regulate and reduce timber harvesting as well as to introduce alternative fuel and power sources;	Immediate		
5.h	Use the Transboundary Watershed Management Committee meetings as an opportunity to discuss the potential creation/expansion of the buffer zone of the property;	Five years	Limited progress	
5.i	Remove the material deposited in the narthex of St. Sophia Church and make the narthex accessible to the public, and check the state of conservation of the narthex and of its mural paintings by certified restorers assessing priorities for intervention;	Immediate	The mission did not have time to enable verification of this activity	Immediate (if not implemented)
5.j	Provide the local inhabitant monitoring the archaeological remains of Lin Church with forms for monitoring the state of conservation of the remains and its surrounding area, as well as visitor monitoring for statistics purposes.	Immediate	Currently implemented	To be continued

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
6. Elaborate Strategic, Environmental and Heritage Impact Assessments according to the ICOMOS Guidance and IUCN World Heritage Advice Note to assess the cumulative impacts of plans and projects and submit them to the World Heritage Centre before any final decision is taken. These should include:	Immediate (beginning)	<p>Not implemented</p> <p>In order to reflect the more recent 2022 <i>Guidance and Toolkit for Impact Assessments in a World Heritage Context</i>, which replaces the previously separate ICOMOS and IUCN Guidance, the Recommendation is updated as follows:</p> <p>6. Undertake Environmental and Heritage Impact Assessments (EIA and HIA) in accordance with the 2022 <i>Guidance and Toolkit for Impact Assessments in a World Heritage Context</i> to assess the potential impacts of proposed projects and submit them to the World Heritage Centre before any final decision is taken. This includes [and a-c remains the same]</p> <p>6.1 Conducting a Strategic Impact Assessment of all projects and plans to assess their cumulative impact on the OUV of the property and its underlying attributes.</p>	Immediate initiation of the activity
6.a All plans and planned infrastructure projects (e.g. highway A2, all envisaged stretches, railway corridor VIII Kichevov – Lin) that may impact on the property, its OUV and attributes, before proceeding with their implementation, including the alternatives that combine the routes of linear infrastructure planned for the Struga plain, as requested by the World Heritage Committee;			See above
6.b High Voltage transmission line focusing on the overhead and underground alternatives;			See above
6.c Gas pipeline project.			See above
7. Recommendations concerning projects to enhance the conservation conditions of the property:			
7.a Improve the existing wastewater treatment system for all settlements in the Lake's basin, ensuring the connection of	Immediate (beginning)/Five years (completion)	Partially implemented - slow progress - wastewater treatment system needs to be improved / transboundary implementation of the Lake Ohrid	Three years

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
the lacking rural areas to the main system or the creation of smaller treatment plants where needed;		Watershed Management Plan, inclusion of ecological measures such as species composition in regular monitoring programmes, etc.	
7.b Ensure the allocation of sufficient financial and human resources for the continuous and efficient running of the Pogradec Wastewater Treatment Plant;	Immediate		Immediate
7.c Implement a long-term, transboundary water quality monitoring programme, including the exchange of relevant scientific data and technical support, and in close collaboration with local environmental authorities;	Immediate (beginning)/Three years (completion)	Partially implemented	Three years
7.d Establish a functional system for communal waste collection, separation and treatment, including the rural areas outside the main towns;	Immediate (beginning)/Three years (completion)	Unable to assess progress - insufficient time	Two years
7.e Proceed with implementing plans to re-divert the Sateska River back into the Crn Drim River as soon as possible, and ensure complete restoration of the Sateska;	Two years (beginning)	Noting that implementation of the plans to re-divert the Sateska River back into the Crn Drim River only allows for a limited diverted flow (15m ³ /s), which is unlikely to resolve the issue of sediment and pollutants, continue with implementation of the project towards ensuring complete restoration of the Sateska	One year
7.f Provide updated information on the detailed urban plans for the 19 complexes of the Old Nucleus of Ohrid and their level of implementation;	Immediate	No progress in the development of the project	Immediate
7.g Implement a transboundary invasive species monitoring programme for Ohrid Lake, and take all necessary measures to control invasive species in the Lake and its tributaries, including implementing control and/or eradication programs if needed;	Three years	Inadequate implementation of a transboundary invasive species monitoring programme for Lake Ohrid, lack of coordination	Two years
7.h Ensure that reintroduction of red deer in Galičica National Park is only carried out according to expert opinion, and the most recent scientific data and best practices available;	Three years	According to available information, the reintroduction of red deer in Galičica National Park is underway.	Ongoing
7.h 1 Review zoning policy to ensure compliance with IUCN standards. Over time, Galičica National Park should achieve the conservation objective of allowing natural processes to occur in 75% of the park area. This		New recommendation	Two years

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
objective should be clearly stated in the vision of the national park;			
7.i Carry out an impact assessment of the off-road vehicle tourism activities currently permitted in Galičica National Park on its protected habitats and species, and develop and enforce regulations to manage these activities within the National Park;	Immediate	This appears to be a challenging task for the park management. (Limited time did not allow the mission to verify and monitor this issue in more detail).	Two years
7.i.1 Implement strict regulations and enforcement measures to prevent illegal off-road driving. Gradually reduce (eventually stop) off-road vehicle use, especially to protect sensitive areas from further degradation;		New recommendation – Off-road driving in national parks is not compatible with IUCN category II quality standard	Three years
7.l Provide detailed information to the World Heritage Centre and the Advisory Bodies on passenger transportation of the already operating passenger boats on both sides of the Lake as well as on the propelling system of the ferry boats and potential pollutants, if any, which can be dispersed into the Lake.	Immediate	Partially implemented	Immediate
8. Recommendations concerning raising awareness of the values of the property and community participation:			
8.a Increase community participation in the management, conservation and monitoring of the property by promoting active collaboration between authorities and civil society and by ensuring that management meetings are open to the public, as well as facilitating access to official information regarding management and the implementation of the World Heritage Committee's recommendations;	Immediate	Implementation is not continuous and consistent	Immediate
8.b Develop environmental awareness and education programmes in close collaboration with local citizens' groups, targeting especially children and visitors during the summer season;	Immediate (preparation) implementation extended in the mid- and long term	Implemented	-

Recommendations	Recommended Timeframe in 2020	Progress March 2024 / Suggestion of new recommendation	New Timeframe
<p>8.c Continuously communicate the World Heritage Supplement to the Management Plan of the PPL in Albania and its content to all national and local institutions and agencies, and promote the objectives and actions of the Supplement among local communities through leaflets and meetings.</p>	<p>Immediate</p>	<p>Not effectively implemented - as suggested by the approved development projects and plans and the pace of development in the area.</p>	
<p>9. Provide updated information and documentation on all project and plan proposals according to paragraph 172 of the <i>Operational Guidelines</i> and submit the most updated project documentation to the World Heritage Centre for examination by the Advisory Bodies before any decision is taken, particularly on the following projects:</p> <ul style="list-style-type: none"> • Ljubaništa 1 and 2; • One hundred villages initiative: Lin, Tushemisht, Gurras; • Waterscape Park Design of Drilon-Tushemisht; • Draft masterplan for the Pogradec waterfront and subsequent implementation operational plans and projects; • Pan European VIII railway; • Free economic zone near Ohrid airport; • Ohrid airport expansion; • Architectural design for the Quay Macedonia in Ohrid, including the finishing, urban furniture, illumination system and vegetation arrangements; • Ohrid ring road. 	<p>Immediate (for all projects)</p>	<p>Documentation was provided for:</p> <ul style="list-style-type: none"> • Waterscape Park Design Drilon – Tushemisht • Masterplan for Tushemish Waterfront • Pan European Railway corridor VIII (Only for the side located in North Macedonia) <p><i>Documentation still missing for:</i></p> <ul style="list-style-type: none"> • <i>Lin and Gurras (One hundred villages initiative)</i> • <i>Railway corridor on Albanian side</i> • <i>Free economic zone near Ohrid Airport (North Macedonia)</i> • Ljubanishta 1 was terminated and Ljubanishta 2 was initially considered but was abandoned • Ohrid airport expansion was not in the agenda 	

VI. ANNEXES

ANNEX I: Terms of Reference

Joint World Heritage Centre/IUCN Reactive Monitoring mission to the transboundary World Heritage property ‘Natural and Cultural Heritage of the Ohrid region’ (Albania, North Macedonia) (25 to 29 March 2024 included)

The World Heritage property ‘Natural and Cultural Heritage of the Ohrid region’, was inscribed on the World Heritage List in 1979 under natural criterion (vii). The property was extended in 1980 to include cultural criteria (i) (iii), and (iv) and again in 2019 to include the part of the lake in Albania, thus becoming a mixed transboundary property.

A joint UNESCO/IUCN/ICOMOS Reactive Monitoring mission in 2020 considered that the property faces both actual and potential threats to its Outstanding Universal Value (OUV) in accordance with paragraphs 179 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention. Subsequently, the World Heritage Committee considered that the legacy of erosion of the property’s attributes over the decades, combined with the continuing impact of the development in both parts of the transboundary property, represented actual and potential danger to the property according to the above paragraph and urged both States Parties to develop a detailed Strategic Recovery Plan with an associated phased action plan, with clearly defined aims and outcomes to mitigate the threats to the OUV, with a set of agreed actions, including a timeframe in both the short and longer term, and a phased action plan, based on the full recommendations of the 2020 mission (Decision 44 COM 7B.77).

At its extended 45th session (Riyadh, 2023), the World Heritage Committee welcomed the joint efforts of the States Parties to develop a Strategic Recovery Plan for the property and requested them to invite a joint World Heritage Centre/ICOMOS/IUCN Reactive Monitoring mission to the World Heritage property ‘Natural and Cultural Heritage of the Ohrid region’ (Decision 45 COM 7B.104, see Annex Ib). The objectives of the Reactive Monitoring mission are to:

1. Examine the development and effective implementation of immediate emergency measures designed to stop new threats and reverse existing ones prior to approval of the Strategic Recovery Plan;
2. Assess progress made in developing the Strategic Recovery Plan for the property, including timeframe, budget and prioritisation of each action, the integration of its actions into national policies, the mobilisation and coordination of the stakeholders involved, as well as the timeframe and process for its approval and implementation;
3. Review the progress made in implementing the recommendations of the 2020 Reactive Monitoring mission and previous decisions of the Committee;
4. Assess the overall state of conservation of the property and evaluate factors and conservation issues that could potentially impact on its OUV, including its conditions of integrity, protection and management.

In particular, the mission team should review and assess the following issues:

1. Review the work undertaken and progress made between the 2022 and the 2024 versions of the draft Strategic Recovery Plan, and advise on the further work required, the timeframe for its finalisation and mechanisms for its effective enforcement, also taking into account the recommendations of the 2023 ICOMOS Technical Review.
2. Review the capacity and the joint mechanisms established by the States Parties to coordinate the management of the property, including a mechanism to monitor joint management efforts and follow-up actions, their effectiveness and their enforcement powers.
3. Assess the degree of implementation of the management system, including the place of the various management plans in the legal frameworks of the States Parties and their enforcement powers.
4. Review and analyse the urban planning protection measures currently applied on both sides of the property and assess their effectiveness, including the implementation of the moratorium in

North Macedonia and the establishment of an inventory of illegal buildings and concrete progress made in the removal of illegal buildings along the lake shore.

5. Review and assess the state of conservation of the old urban centre of Ohrid and of the Lin peninsula.
6. Assess actions and measures taken to protect existing and possibly undeclared archaeological sites that may be threatened by infrastructure development in the property and its buffer zone.
7. Review and analyse the various infrastructure and tourism development projects planned and implemented in the property and its buffer zone, including but not limited to the Drilon-Tushemisht Water Park.
8. Assess progress in the implementation of an efficient system of sewage treatment for the property.
9. Review progress in addressing the pollution of the waters of the lake Ohrid and its impact on the fauna and flora.
10. Review and assess the state of conservation of the Studenčišča Marsh, the springs of Saint Naim and the Galichica National Park.

Based on the above, the mission should make a recommendation as to whether the property meets the criteria for inscription on the List of World Heritage in Danger, in accordance with paragraphs 179 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention.

The States Parties should ensure that the mission is provided with all relevant information and documentation to enable it to review and assess the issues listed above, and that the mission is able to carry out field visits for a comprehensive inspection of the property and its buffer zone.

The States Parties are requested to facilitate the necessary consultations through working meetings with stakeholders, including governmental authorities at the national and local levels, the property management authorities, the Strategic Recovery Plan drafting team of, relevant scientists and scientific institutions, and all other relevant stakeholders including NGOs and local communities.

The mission will also take into account the States Parties' report on the state of conservation of the property, due by 1 February 2024 and received on 22 February 2024. In order to ensure adequate preparation for the mission, the State Parties should provide the documentation requested in Annex Ia, which includes a request for a) more detailed information for some parts of the state of conservation report dated February 2024 and b) information consisting of follow-up documents related to the documentation requested by the 2020 Reactive Monitoring mission team. The information should be provided to the World Heritage Centre as soon as possible and preferably no later than two weeks before the start of the mission.

If, during or immediately after the mission, the mission experts identify a need for additional information, this should be provided by the States Parties as soon as possible, and no later than two weeks after the mission's request.

In order to facilitate the preparation of the mission, the States Parties, in cooperation with the World Heritage Centre, ICOMOS and IUCN, should prepare a detailed mission programme, including a list of persons and institutions to be consulted, which should be submitted in draft form to the World Heritage Centre for review as soon as possible, and no later than two weeks before the start of the mission.

Following the mission, the World Heritage Centre, ICOMOS and IUCN will prepare a concise report of the findings and recommendations using the standard format for examination by the World Heritage Committee at its 46th session. The final draft of the mission report will be made available to the States Parties for comment on any factual errors.

It should be noted that recommendations will be provided in the mission report and not during the course of the mission. In accordance with UNESCO, ICOMOS and IUCN policy, the experts participating in the mission will not engage with the media and will not discuss the findings or recommendations of the mission, which will only be included in the final report.

Annex Ia

Documentation to be provided prior to the mission

A. Information to supplement the joint state of conservation report received on 22 February 2024:

- a) Detailed information on the new Draft Law on the Management of the World Natural and Cultural Heritage of the Ohrid region, including details of its enforcement powers.
- b) Details on the proposal to declare the village of Lin a 'protected landscape'.
- c) Information on the outcomes of the assessment of the influence of the rivers Sateska, Koselska and Velgoshka on the quality of water of the Lake Ohrid littoral zone based on physico-chemical and specific biological parameters by the Public Scientific Institution Hydrobiological Institute
- d) Information on the impact assessment undertaken for the Drilon-Tushemisht Water Park project;
- e) Information on the status of the proclamation of the Studenčišča Marsh as a nature park and of Lake Ohrid as a Monument of Nature;
- f) Information on the re-routing of the Sateska River, including relevant documents from the impact assessment of the project;
- g) Information on the plan for the revised route of the railway Corridor VIII in its section between the borders of North Macedonia and Albania.

B. Follow-up information on the 2020 UNESCO/IUCN/ICOMOS Reactive Monitoring mission:

Albania

- Information on the lake, such as (but not limited to) water quality, benthic fauna, fish population, including where the samples were taken;
- Latest Bird reports (since 2020);
- Report on the removal of the mining dump near the lake and rehabilitation of the area, including amount removed, amount to be removed, timeframe for removal (when started, expected end), timeframe for rehabilitation, and water quality of the lake next to the dump (if available);
- A detailed report with a map showing which villages are connected (or not yet connected) to the sewerage system;
- Information on beach use regulations, including permitted and non-permitted uses, restrictions, timeframe for temporary installations (when they can be installed, when they are to be removed), examples of structures that have been approved or denied, list of temporary structures that have been removed voluntarily by the concessionaires and for which the municipality has had to intervene, list and pictures of structures that are still to be removed since summer of 2020;
- Progress on the waste dump in the buffer zone near Tushemisht including pictures of any interventions made;
- Inventory of illegal fish farms, including a map of fish farms (legal, illegal, voluntarily closed, forcibly closed) and closure dates for those that have been removed;

North Macedonia

- Update on the underwater archaeology (if available);
- Plans, details and updates on the upgrading the sewerage system and the construction of the water treatment plant;
- Inventory of illegal buildings (buildings that have permit problems), mapping (if available) and status of demolitions and legalisations (how many legalised and for what reasons, how many are pending) since 2020;

- List of illegal buildings that have been legalised, under which criteria, locations and authorising authorities;
- Information on the lake water quality and eutrophication;
- List of illegal buildings and their priorities for demolition in the National Park, including a map (if available);
- Information on the 4x4 tourism activities (names of existing companies allowed to carry out activities, whether they have licenses, how many vehicles, frequency of activities, any restrictions/obligations to be followed, etc.);
- Information on licences for fish farms, including whether there are any illegal fish farms and the procedure for removing them (if available).

Annex Ib

Decision 45 COM 7B.104

Natural and Cultural Heritage of the Ohrid region (Albania, North Macedonia) (C/N 99quater)

The World Heritage Committee,

1. Having examined Document WHC/23/45.COM/7B.Add.2,
2. Recalling Decision **44 COM 7B.7[7]** adopted at its extended 44th session (Fuzhou/online, 2021),
3. Welcomes the joint efforts of the States Parties to develop a Strategic Recovery Plan for the property but calls on the States Parties to ensure the following:
 1. The inclusion of an implementation timeframe, budget and prioritisation for each action in the Strategic Recovery Plan,
 2. The extension to Albania of the implementation of actions envisaged only in North Macedonia but relevant to both States Parties,
 3. Adequately staffed, resourced and mandated national teams to liaise and coordinate with all relevant institutions to guarantee the integration of the actions of the Strategic Recovery Plan into national policies and plans, as well as an inter-institutional effort to halt and reverse the threats and achieve the goals set out in the Strategic Recovery Plan;
4. Urges the States Parties to put in place immediate emergency measures to bring together all relevant actors to stop new threats and reverse existing threats before the Strategic Recovery Plan has been finalised, approved and begun to take effect;
5. Notes with serious concern the assessment made in Chapter 4 of the Strategic Recovery Plan regarding the vulnerability of the property and the negative factors affecting it and urgently requests that:
 1. Amendments to Detailed Urban Plans and approval of Local Development Plans outside settlements be suspended until a Heritage Impact Assessment at the strategic level is carried out and demonstrates that the attributes underlying the property's Outstanding Universal Value (OUV) are not adversely affected by these plans,
 2. the General Urban Plans for Ohrid and Struga and the spatial planning instruments for non-built-up areas be elaborated as a matter of urgency and in full respect of the attributes underlying the OUV of the property;
6. Requests to the State Party of North Macedonia to submit to the World Heritage Centre, upon completion, the feasibility study for the Urban Plan for areas and buildings of State importance in the coastal belt of the Ohrid region for review by the Advisory Bodies;
7. Urges the State Party of North Macedonia to finalise the proclamation of Studenčišča Marsh as a nature park and Lake Ohrid as a Monument of Nature, and to ensure that management measures conserve the key ecological processes and features which contribute to the property's OUV;
8. Expresses its deepest concern about the approval of the Drilon-Tushemisht Water Park project without the corresponding recommendations of the 2020 Reactive Monitoring mission having been implemented and requests the State Party of Albania to halt further implementation of the project and transmit to the World Heritage Centre the detailed documentation of the approved project, for review by the Advisory Bodies;

9. Requests the State Party of North Macedonia to provide to the World Heritage Centre detailed documentation of approved projects for the A2 Kichevo-Ohrid section of the highway for review by the Advisory Bodies;
10. Also requests the States Parties to continue addressing the issue of illegal buildings and structures and to ensure that those already removed are not reinstated and that new illegal structures do not occur;
11. Further requests the States Parties to ensure systematic assessment of impacts of plans and projects, including but not limited to the project for the re-routing of the Sateska River and the plan for revised route for the railway Corridor VIII in its section between the North Macedonian and Albanian borders, on the attributes of OUV of the property according to the Guidance and Toolkit on Impact Assessments in World Heritage Context;
12. Regrets that, despite initial efforts by the States Parties to redress threats to the property, tangible outcomes are yet to be achieved and risk being undermined by ever-emerging threats and lack of a coherent vision shared by all actors to conserve the property's OUV and strongly urges the States Parties to implement immediate emergency measures to address existing threats and prevent emerging threats from negatively impacting the OUV of the property;
13. Further requests the States Parties to strengthen their transboundary coordination and cooperation in addressing the threats to the property by:
 1. Enhancing reciprocal communication and coordination about plans and projects that may impact the attributes underlying the property's OUV,
 2. Continuing improvements to the resourcing of the transboundary working group established for the preparation of the Strategic Recovery Plan with the mandate to support the operational implementation of the plan;
14. Requests the States Parties to invite, as a matter of urgency, a joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission to the property in order to examine the effective implementation of the immediate emergency measures, the level of mobilisation and coordination of all the stakeholders involved as well as the implementation of the recommendations of the 2020 mission and the repeated requests of the Committee, and to assess the overall state of conservation of the property;
15. Requests the States Parties to submit to the World Heritage Centre, by **1 February 2024**, a revised draft of the Strategic Recovery Plan and a joint 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 46th session, **considering that the urgent conservation needs of this property require a broad mobilisation to preserve its Outstanding Universal Value, including the possible inscription on the List of World Heritage in Danger.**

ANNEX II: Composition of the mission team

UNESCO representative:

Maria Liouliou
Associate Programme Specialist
Europe and North America Unit
UNESCO World Heritage Centre

ICOMOS representative

Luisa De Marco
ICOMOS Advisor

IUCN representative

Vladivoj Vancura
IUCN Expert

ANNEX III: Itinerary and programme of the mission

Albania

Day 0 – Sunday 24 March 2024

14.15 (Maria Liouliou & Vladivoj Vancura) – **16:05** (Luisa De Marco)

Arrival in Tirana airport

Day 1 – Monday 25 March 2024

09.30 – 11.00

Meeting at Ministry of Tourism and Environment

Meeting with high Officials and senior representatives from the Ministry of Tourism and Environment, participants from the American-Albanian Development Foundation, Bledi Hoxha (Project Manager at AADF), and Prof. Dr. Ferdinand Bego (Professor at University of Tirana, Environmental Expert)

11.00 – 13.00

Meeting at Ministry of Economy, Culture and Innovation

Meeting with high Officials and senior representatives from the Ministry of Economy, Culture and Innovation and the Secretary General of the National Commission for UNESCO

14.00

Travel to Pogradec

16.00 – 19.30

Field visits

“Lin village”, one of 100 tourist villages

- Visit to the ruins of the Early Christian Church and the "Mosaics" (Basilica) in Lin Village: Assessment of Conservation and Physical Security
Introduction by the Regional Directorate of Cultural Heritage Korça
- Lin prehistoric pile dwellings including the prehistoric settlement near Lin recently discovered in 2023
Introduction by the Representatives of the Municipality of Pogradec/Institute of Archaeology/Academy of Science

20.00

Dinner

Hosted by the Municipality of Pogradec

Day 2 – Tuesday 26 March 2024

09.00 – 10.00

Field Visit - Presentation on Pogradec

“Pogradec Historical Center”: Presentation of projects related to the Historic Center- Revitalization Bonus Programme

Introduction by the Representatives of the Municipality of Pogradec/Introduction by the Regional Directorate of Cultural Heritage Korça

10.00 – 12.00

Meeting at Municipality of Pogradec

Meeting with the Mayor of Pogradec and representatives of regional Institutions

12.00 – 13.30

Meeting at Municipality of Pogradec

Meetings with representatives of civil society and representatives of local community

14.00 – 15.00

Castle of Pogradec

Presentation of the project “Revitalization of the walls of the castle of Pogradec”
Introduction by the Deputy Mayor of the Municipality of Pogradec

15.00 – 18.00

Field visits

Introduction to some of the latest investments of the Municipality of Pogradec
Visit in Drilon and Tushemisht (Drilon Tushemisht Waterscape Park)

- Drilon Park
- Visitors Centre
- Waterfront

18.30 – 19.30

Meetings with local artists

Meeting with the local Artist – Anastas Kostandini – Albanian painter, mosaicist, cartoonist, graphic artist, illustrator, Venue: Taso Studio

Meeting with a local Artist at “Icka Family” – a family with a multigenerational tradition in the arts (Crafts), Venue: Icka family

Day 3 – Wednesday 27 March 2024

8.00-8.30

Quick visit to the Tushemisht village

8.45

Accompanying the Mission to the cross-border point with North Macedonia, Ohrid Region

North Macedonia

Day 3 – Wednesday 27 March 2024

09.30

Mission pick-up from "Saint Naum" Border Crossing

Welcome by the Mission Coordination Team

09.30 – 13.00

Site Visits and meetings with the management/representatives of institutions

- National Park "Galičica": Mr. Aleksandar Buzlevski, Director a.i
- PSI Hydrobiological Institute: D-r Orhideja Tasevska, Director
- Studenčišča Marsh
- PE Kolektorski Sistem: Mr. Vladimir Aleksijoski, Director a.i and Mr. Faton Polozhani, Deputy director a.i.

Including Mission Coordination Team

13.10 – 13.40

Check-in at the hotel

13.45 – 15.15

Lunch

Hosted by: Mr. Aleksandar Buzlevski, Director a.i of the National Park "Galičica"

Attending: Director Buzlevski, Mission Coordination Team

15.30 – 16.45

Meeting at Municipality of Ohrid

Working meeting with Mr. Kiril Pecakov, Mayor of Municipality of Ohrid

Attending: Ohrid Municipality Employees and Experts, Mission Coordination Team

17.00 – 18.00

Meeting at Municipality of Ohrid

Meeting with the representatives of the Civil Society

Attending: Representatives of Civil Society, Mission Coordination Team

18.15 – 19.15

Internal expert working meeting

19.30

Dinner

Hosted by: Mr. Kiril Pecakov, Mayor of Municipality of Ohrid

Attending: Mayor Kiril Pecakov, Mission Coordination Team

Day 4 – Thursday 28 March 2024

09.00 – 09.30

Meeting at Municipality of Struga

Working meeting with Mr. Ramiz Merko, Mayor of Municipality of Struga

Attending: Struga Municipality Employees and Experts, Mission Coordination Team

10.00 – 12.45

Site visits

Railway Corridor 8, Radozhda and surroundings

Attending: Mission Coordination Team, representatives from PE Railways Infrastructure and representatives from PE for State Roads - Project Implementation Unit - Corridor 8 and 10 d, Contractor Behtel/Enka and the Supervision IRD Engineering

13.30 – 14.15

Meeting at National Institute for the Protection of Monuments of Culture and Museum (Ohrid)

Meeting with the Minister of Culture and President of the National Commission for UNESCO, Mrs. Bisera Kostadinovska – Stojchevska, the Director of the Directorate for the Protection of Cultural Heritage, Mr. Zoran Pavlov and the Director of the NI Institute for the Protection of Monuments of Culture and Museum - Ohrid, Mrs. Irena Shain

Attending: Mission Coordination Team and Experts from the Institute and Museum

14.30 – 15.30**Lunch**

Hosted by: Ms. Bisera Kostadinovska – Stojchevska, Minister of Culture and President of the National Commission for UNESCO

Attending: Minister Kostadinovska – Stojchevska, Mission Coordination Team, Director Irena Shain

15.30 – 17.00**Visit to the old urban centre of Ohrid****17.30****Internal expert working meeting****Day 5 – Friday 29 March 2024****08.00****Departure to Skopje from hotel****11.00****Arrival in Skopje and check-in at the hotel****12.00 – 13.00****Meeting at Ministry of Environment and Spatial Planning**

Meeting with the Minister of Environment and Physical Planning, Mrs. Kaja Shukova

Attending: Mission Coordination Team, Mrs. Ljupka Dimova Zajkov, deputy head of Department for Water, MoEPP

13.00 – 14.30**Lunch**

Hosted by: Ms. Kaja Shukova, Minister of Environment and Physical Planning

Attending: Minister Kaja Shukova, Mission Coordination Team, Mrs. Ljupka Dimova Zajkov

14.45 – 15.30**Meeting at Ministry of Transport and Communications**

Meeting with the Minister of Transport and Communications, Mr. Blagoj Bochvarski, Director of the PE Railways Infrastructure, Mr. Zoran Trifunovski and the Director of PE for State Roads, Mr. Ejup Rustemi

Attending: Mission Coordination Team, Ministry and PE Experts

15.45 – 16.45**Meeting at Ministry of Culture**

Meeting with the Strategic Recovery Plan for the Natural and Cultural Heritage of the Ohrid Region (2023-2030) drafting expert team

19.30**Dinner**

Hosted by: Mr. Blagoj Bochvarski, Minister of Transport and Communications

Day 6 – Saturday 30 March 2024**Departure from hotel to Skopje International Airport**

ANNEX IV: List of people met during the mission

Albania

- **Ministry of Tourism and Environment**

1. Mrs. Almira Xhembulla, Vice Minister Ministry of Tourism and Environment
2. Mrs. Klodiana Marika, Ministry of Tourism and Environment
3. Mr. Daniel Pirushi, National Agency of Protected Areas in Albania (NAPA)
4. Mrs. Julia Selmani, National Agency of Protected Areas in Albania (NAPA)
5. Mr. Bledi Hoxha, Albanian-American Development Foundation (AADF)
6. Mr. Ferdinand Bego, Environmental Expert University of Tirana

- **Ministry of Economy, Culture and Innovation**

7. Mr. Blendi Gonxhja, Minister of Economy, Culture and Innovation (MECI)
8. Mrs. Lira Pipa, Deputy Minister of Economy, Culture and Innovation (MECI)
9. Mrs. Ardiana Hobdari, Director, National Commission for UNESCO, Ministry for Europe and Foreign Affairs
10. Mrs. Edlira Përfundi, Director, Directorate of Cultural Development Programs, MECI
11. Mrs. Sonila Kora, Head of Unit, Directorate of Cultural Development Programs, MECI

- **National and regional institutions**

12. Mrs. Klesta Qirici, General Director, National Institute of Cultural Heritage
13. Mrs. Rudina Papavasili, Director, National Institute of Cultural Heritage
14. Mrs. Joli Mitrojorgji, Head of Unit, National Institute of Cultural Heritage
15. Mr. Edvis Koki, Director, Regional Administration of Protected Areas, Korça
16. Mr. Noldi Shaho, Regional Administration of Protected Areas, Korça
17. Mr. Gani Bego, Regional Administration of Protected Areas, Korça
18. Mr. Dhimitraq Prishka, Director, Regional Directorate of Cultural Heritage, Korçë
19. Mrs. Froседа Angjellari, Municipality of Pogradec
20. Mr. Andi Kosta, Advisor, Municipality of Pogradec

The list of the participants from the Municipality of Pogradec that the State Party has shared seems incomplete.

- **Civil society and local community** (list not submitted by the State Party of Albania)

North Macedonia

- **Ministry of Culture**

1. Mrs. Bisera Kostadinovska - Stojchevska, Minister and President of the National Commission for UNESCO
2. Mr. Zoran Pavlov, Director, Directorate for the Protection of Cultural Heritage, focal point for the cultural heritage of the World Heritage "Natural and Cultural Heritage of the Ohrid Region"
3. Mrs. Tatjana Kraljevska - Lazarova, Secretary General of the National Commission for UNESCO

- **Ministry of Environment and Physical Planning**

4. Mrs. Kaja Shukova, Minister
5. Mrs. Jasmina Petkovska, Head of Department for International Cooperation, focal point for the natural heritage of the World Heritage "Natural and Cultural Heritage of the Ohrid Region"
6. Mr. Vlatko Trpeski, Head of Department for Nature
7. Mrs. Ljupka Dimova Zajkov, Deputy head of Department for Water, member of the Strategic Recovery Plan for the Natural and Cultural Heritage of the Ohrid Region (2023-2030) drafting expert team

- **Ministry of Transport and Communications**

8. Mr. Blagoj Bochvarski, Minister
9. Mrs. Ana Gjorgjioska, Officer in the Cabinet of the Minister
10. Mr. Zhivko Spaseski, Special Adviser to the Minister
11. Mrs. Tatjana Dzokikj, Deputy head of Department for Legal Affairs

- **Municipality of Ohrid**

12. Mr. Kiril Pecakov, Mayor
13. Mr. Kiril Iloski, Assistant Head of Department for Urban Planning and Construction Land Management
14. Mrs. Jasmina Momirovska, Head of Unit for Environmental Protection and Waste Management
15. Mrs. Irena Spaseska, Assistant Head of Department for Tourism and Local Economic Development

- **Municipality of Struga**

16. Mr. Ramiz Merko, Mayor
17. Mrs. Katerina Ilieska Sekuloska, Secretary of the Municipality
18. Mr. Mitko Korkutoski, Head of the Department for Inspection Affairs
19. Mr. Gjorgji Dishlioski, Advisor at the Department for Urban Planning

- **PI Galičica National Park**

20. Mr. Aleksandar Buzlevski, Director
21. Mr. Andon Bojadzi, Head of the Department for Nature conservation
22. Mrs. Sanja Rilkoska, Head of the Department of law and general affairs
23. Mr. Dejan Dimidzievski, Associate for animal species
24. Mr. Kliment Nanev, Associate for habitat and plant species

- **PSI Hydrobiological Institute**

25. Dr. Orhideja Tasevska, Director

- **PE Kolektorski Sistem**

26. Mr. Vladimir Aleksijoski, Director

27. Mr. Ziba Diel, Head of the Department for Legal Affairs

- **Public Enterprise Railways Infrastructure**

28. Mr. Zoran Trifunovski, Director

29. Mr. Gjorgji Pushev, Head of Unit for projecting and preparing technical documentation

30. Mrs. Dobrila Ilieva, Assistant Head for Department for Investments

- **Public Enterprise for State Roads**

31. Mr. Ejup Rustemi, Director

32. Mr. Zoran Slamkov, M.Sc.CE Lead Project Coordinator, Project Implementation Unit - Corridor 8 and 10 d

33. Mrs. Limba Minova Zlateski, Specialist in urban planning documentation, Project Implementation Unit - Corridor 8

- **Contractor Behtel/Enka**

34. Mr. Caglar Kandemir, Civil Engineer

35. Mrs. Bronwyn Hinspeter, Environmental Interface Specialist

- **Supervision IRD Engineering**

36. Mr. Rame Qupeva

- **ESM Power plants of North Macedonia**

37. Mr. Marjan Glavincheski, Manager of Hydropower plant “Globochica” - Struga, HES “Crn Drim” – Struga

- **NI Institute for the Protection of Monuments of Culture and Museum – Ohrid**

38. Mrs. Irena Shain, Director

39. Mr. Dragan Taneski, curator archeologist

40. Mr. Anatoli Arnaudovski, senior curator archeologist

- **Strategic Recovery Plan for the Natural and Cultural Heritage of the Ohrid Region (2023-2030) drafting expert team**

41. Mrs. Emilia Apostolova Chalovska, PhD, member of the Expert Team for Support of the Ministry of Culture of the Republic of North Macedonia in the Implementation of Protective Activities for the World Natural and Cultural Heritage of the Ohrid Region

42. Mrs. Ana Aleksova Tutkovska, MSc., Junior Associate for International Assistance and Cooperation, Directorate for the Protection of Cultural Heritage

43. Mrs. Frosina Antonovska, MSc., legal consultant for the environment

- **Civil society representatives**

44. Mrs. Iskra Stojkoska, Front 21/42

45. Mrs. Elena Zografaska, Front 21/42

46. Mr. Vladimir Trajanovski, SOS Ohrid

47. Mr. Boris Stojanovski, NGO Grashnica

48. Mr. Borce Dzajkoski, NGO Grashnica

49. Mr. Lazo Naumoski, Independent ecologist

50. Mr. Nikola Kiselinov, Ohrid Tourist Association Biljana...

51. Mrs. Valentina Todoroska, Macedonian Archaeological Society

52. Mr. Jovan Sekuloski, Diving Center Amfora

53. Mr. Boris Mateski, Green Center Ohrid

ANNEX V: Statement of Outstanding Universal Value of the property

Brief synthesis

The Lake Ohrid region, a mixed World Heritage property covering c. 94,729 ha, was first inscribed for its nature conservation values in 1979 and for its cultural heritage values a year later. These inscriptions related to the part of the lake located in North Macedonia. The property was extended to include the rest of Lake Ohrid, located in Albania, in 2019.

Lake Ohrid is a superlative natural phenomenon, providing refuge for numerous endemic and relict freshwater species of flora and fauna dating from the tertiary period. As a deep and ancient lake of tectonic origin, Lake Ohrid has existed continuously for approximately two to three million years. Its oligotrophic waters conserve over 200 species of plants and animals unique to the lake, including algae, turbellarian flatworms, snails, crustaceans and 17 endemic species of fish including two species of trout, as well as a rich birdlife.

Situated on the shores of Lake Ohrid, the town of Ohrid is one of the oldest human settlements in Europe. Built mostly between the 7th and 19th centuries, Ohrid is home to the oldest Slav monastery (dedicated to St. Pantelejmon) and more than 800 Byzantine-style icons of worldwide fame dating from the 11th century to the end of the 14th century. Ohrid's architecture represents the best preserved and most complete ensemble of ancient urban architecture of this part of Europe. Slav culture spread from Ohrid to other parts of Europe. Seven basilicas have thus far been discovered in archaeological excavations in the old part of Ohrid. These basilicas were built during the 4th, 5th and beginning of the 6th centuries and contain architectural and decorative characteristics that indisputably point to a strong ascent and glory of Lychnidos, the former name of the town. The structure of the city nucleus is also enriched by a large number of archaeological sites, with an emphasis on early Christian basilicas, which are also known for their mosaic floors. Special emphasis regarding Ohrid's old urban architecture must be given to the town's masonry heritage. In particular, Ohrid's traditional local influence can be seen among its well-preserved late-Ottoman urban residential architecture dating from the 18th and 19th centuries. The limited space for construction activities has led to the formation of a very narrow network of streets.

On the Lin Peninsula, in the west of the Lake, the Early Christian Lin church, founded in the mid-6th century, is related to the basilicas of Ohrid town in terms of its architectural form and decorative floor mosaics, and possibly also through liturgical links.

Although the town of Struga is located along the northern shores of Lake Ohrid, town life is concentrated along the banks of the Crn Drim River, which flows out of the lake. The existence of Struga is connected with several fishermen settlements on wooden piles situated along the lake shore. A great number of archaeological sites testify to origins from the Neolithic period, the Bronze Age, the Macedonian Hellenistic period, the Roman and the early Middle Age period. Similar pre-historic pile dwelling sites have also been identified in the western margins of the Lake.

The convergence of well-conserved natural values with the quality and diversity of its cultural, material and spiritual heritage makes this region truly unique.

Criterion (i): The town of Ohrid is one of the oldest human settlements in Europe. As one of the best preserved complete ensembles encompassing archaeological remains from the Bronze Age up to the Middle Ages, Ohrid boasts exemplary religious architecture dating from the 7th to 19th centuries as well as an urban structure showcasing vernacular architecture from the 18th and 19th centuries. All of them possess real historic, architectural, cultural and artistic values. The concentration of the archaeological remains and urban structures within the old urban centre of Ohrid, in the Lin Peninsula, and along the coast of Lake Ohrid as well as the surrounding areas creates an exceptional harmonious ensemble, which is one of the key features that make this region truly unique.

Criterion (iii): The property is a testimony of Byzantine arts, displayed by more than 2,500 square metres of frescoes and more than 800 icons of worldwide fame. The churches of St. Sophia (11th century), Holy Mother of God Perivleptos and St. John Kaneo notably display a high level of artistic achievements in their frescoes and theological representations, executed by local as well as foreign artists. Ancient architects erected immense basilicas, which were to serve as models for other basilicas for centuries. The development of ecclesiastical life along the shores of the lake, along with its own religious

architecture, frescoes and icons, testifies to the significance of this region as a religious and cultural centre over the centuries. The similarities between the mosaics of Lin church in the west of the Lake with those of the early basilicas of Ohrid to the east, reflect a single cultural tradition.

Criterion (iv): The Lake Ohrid region boasts the most ancient Slavonic monastery and the first Slavonic University in the Balkans – the Ohrid literary school that spread writing, education and culture throughout the old Slavonic world. The old town centre of Ohrid is a uniquely preserved, authentic ancient urban entity, adjusted to its coastal lake position and terrain, which is characterised by exceptional sacred and profane architecture. The architectural remains comprising a forum, public buildings, housing and sacred buildings with their infrastructure date back to the ancient town of Lychnidos (the former name of the town). The presence of early Christian architecture from 4th to 6th centuries is attested by the lofty basilicas of Ohrid and the small church of Lin. The Byzantine architecture of Ohrid with a great number of preserved sacred buildings of different types from 9th to 14th centuries, is of paramount importance and contributes to the unity of its urban architecture.

Criterion (vii): The distinctive nature conservation values of Lake Ohrid, with a history dating from pre-glacial times, represent a superlative natural phenomenon. As a result of its geographic isolation and uninterrupted biological activity, Lake Ohrid provides a unique refuge for numerous endemic and relict freshwater species of flora and fauna. Its oligotrophic waters contain over 200 endemic species with high levels of endemism for benthic species in particular, including algae, diatoms, turbellarian flatworms, snails, crustaceans and 17 endemic species of fish. The natural birdlife of the Lake also contributes significantly to its conservation value.

Integrity

The property encompasses all of the features that convey the property's Outstanding Universal Value in relation to natural and cultural criteria.

Main threats to the integrity of the property include uncoordinated urban development, increasing population, inadequate treatment of wastewater and solid waste, and tourism pressure, as well as a number of other issues. In addition, pollution from increased traffic influences the quality of the water, which leads to the depletion of natural resources. The highly endemic biodiversity and natural beauty of the Lake are particularly vulnerable to changes in water quality, and there is alarming evidence of a growth in nutrients threatening the oligotrophic ecology of the Lake. This oligotrophic state is the basis for its nature conservation value, and action to tackle this threat must be a priority.

The integrity of the town of Ohrid suffered to some extent, as several houses built at the end of 19th century were demolished in order to exhibit the excavated remains of the Roman Theatre. The overall coherence of the property, and particularly the relationship between urban buildings and the landscape setting of the Lake, is vulnerable to the lack of adequate protection and control of new development.

Authenticity

The town of Ohrid is reasonably well preserved, although uncontrolled incremental interventions have impacted the overall form of the monumental urban ensemble as well as the lakeshore and wider landscape. These are also vulnerable to major infrastructure projects and other developments.

Concerning the religious buildings around Ohrid, important conservation and restoration works have been carried out since the 1990s. Conservation works on the monuments in the region have been thoroughly researched and documented, but some have impacted the property's authenticity. The icons and frescoes are in good condition and kept in the churches. The originally residential function of some buildings has changed over time, as have some of the interior outfitting of residential buildings, which were altered to improve living conditions. While reconstructions often used materials identical to those used at the time of construction, new materials have also been used on occasion, which presents a threat for the authenticity of the property.

The Lin church and its context is vulnerable to lack of protection and, inadequately controlled conservation and development. At the western side of the Lake, the support the buffer zone offers to the Lin peninsula and the landscape setting of the Lake is likely to be ineffective as a result of a lack of adequate protection and development control.

Protection and management requirements

The Natural and Cultural Heritage of the Ohrid region has several layers of legal protection afforded by both States Parties. In the North Macedonia n part of the property, the protection of cultural heritage is regulated by the Law on Cultural Heritage Protection (Official Gazette of RM No. 20/04, 115/07), by-laws and a law declaring the old city core of Ohrid as a cultural heritage of particular importance (Official Gazette of RM No. 47/11). There is currently no specific national protection for cultural sites located in Albania. The protection of natural heritage is regulated by the Law on Nature Protection (Official Gazette of RM No. 67/2004, 14/2006 and 84/2007), including within and outside of protected areas. There is also the Law on Managing the World Cultural and Natural Heritage of the Ohrid Region (Official Gazette of RM No. 75/10). In Albania, the Pogradec Terrestrial/Aquatic Protected Landscape (PPL) was legally established in 1999 to protect both terrestrial and aquatic eco-systems, and covers the entire area of the property and its buffer zone. The States Parties have also signed several agreements for management and protection of the Lake, for instance the 2003 Law on Protection of Transboundary Lakes. Legal instruments need to be kept updated and implemented to protect the property.

The property is managed and protected through a range of relevant management documents, and an effective overall management plan is a clear long-term requirement. The “Physical Plan of the Republic of Macedonia” [sic] of 2004 provides the most comprehensive long-term and integrated document for land management, providing a vision for the purpose, protection, organization and landscape of the country and how to manage it. In Albania, the management plan for the PPL is of a high-quality, and a Protective Landscape Management Plan was developed in 2014, with the objectives to strengthen management, increase habitat protection and conservation, develop touristic and recreational use, and encourage the development of sustainable agriculture and socio-economic activities. This includes a five-year Action Plan (2014-2019) that aims to start remedial measures through strengthening management and cooperation and improving the legal framework. The Plan proposes to exclude the urban areas and the areas where intensive agricultural practices take place around the towns of Pogradec and Buçimas from the zoning of the protected landscape. To this Management Plan has been added a World Heritage Supplement (2017-2027) that sets out systems to strengthen the management of the extended property and its buffer zone. This supplement covers both cultural and natural heritage in terms of threats and necessary actions. These plans need to be effectively implemented and updated regularly. Deficiencies have been noted in the general implementation of urban and protected area planning regulations and plans in both States Parties, which need to be addressed in full.

In North Macedonia, the property is managed by two ministries (the Ministry of Culture and the Ministry of Environment and Physical Planning), via three municipalities (Ohrid, Struga and Debrca), although the municipalities legally do not have the authority to protect cultural and natural heritage. The Institute for Protection of Monuments of Culture and Museums in Ohrid has the authority to protect cultural heritage, and the Natural History Museum in Struga is responsible for protecting movable heritage. The Galichica National Park is authorized to manage natural heritage within the park as a whole, and part of the cultural heritage located within the territory of the Park. The Institute for Hydrobiology in Ohrid is responsible for the continuous monitoring of the Lake Ohrid ecosystem, the research and care for Lake Ohrid's flora and fauna, as well as the management of the fish hatchery, also to enrich the Lake's fish stocks. In Albania, a management committee is proposed that is a modified version of the Committee for the Protected Areas. This will consist of representatives of the key government agencies covering both culture and nature, with the National Agency for Protected Areas having a central responsibility in relation to nature conservation matters, and a representative of a citizen's initiative.

Integrated management of natural and cultural heritage through a joint coordinating body and joint management planning are urgently needed to ensure that both the natural and cultural values of the property are conserved in a fully integrated manner. Given the vulnerabilities of the property related to the development and impacts of tourism, the management requirements for the property need strengthening and new cooperation mechanisms and management practices must be put into place. This may include re-evaluating the existing protected areas, and ensuring adequate financial and human resources for management as well as effective management planning and proper law enforcement. Whilst transboundary management mechanisms are set up on paper, these need to be actively and fully operational, on an ongoing basis, in order to ensure the transboundary cooperation required to secure the long-term future for Lake Ohrid. Adequate budgets also need to be provided, beyond the aspirations set out in the management documents for the property. Effective integration and implementation of

planning processes at various levels, cross-sectorial cooperation, community participation and transboundary conservation are all preconditions for the successful long-term management of Lake Ohrid.

A range of serious protection and management issues require strong and effective action by the States Parties, acting jointly for the whole of the property as well as within each of their territories. These include the urgent need to protect the water quality of the Lake and therefore maintain its oligotrophic ecological function; to tackle tourism and associated legal and illegal development and the impacts of development on habitats and species throughout the property, including on the lake shores. Resource extraction also needs to be effectively regulated, and enforced, including in relation to fisheries and timber harvesting; and action is required to protect against the introduction of alien invasive species. There is also evidence of climate change impacting the property, such as through the warming of the lake, which requires international attention as such issues cannot be tackled at the local level.

ANNEX VI: List of received and consulted documents and publications

Committee decisions, mission reports, and state of conservation reports

Nomination and extensions

World Heritage Committee (1979) [Nomination File 99](#).

World Heritage Committee (1980) [Decision 4 COM V.13](#).

World Heritage Committee (2019) [Decision 43 COM 8B.9. Natural and Cultural Heritage of the Ohrid region \(Albania/North Macedonia\). Baku, Azerbaijan](#).

Advisory Bodies Evaluations and Technical Reviews

ICOMOS (2024) Technical Review on the State Parties' Strategic Recovery Plan (2023 -2030).

Maps

(2009) [Natural and Cultural Heritage of the Ohrid region – Map of the inscribed property](#).

(2019) [Natural and Cultural Heritage of the Ohrid region – Map of the inscribed extension](#).

Committee Decisions

World Heritage Committee (2021) [Decision 44 COM 7B.77. Natural and Cultural Heritage of the Ohrid region \(Albania/North Macedonia\) \(C/N 99\). Fuzhou, China/Online](#).

World Heritage Committee (2021) [Decision 44 COM 13. International Assistance. Fuzhou, China/Online](#).

World Heritage Committee (2023) [Decision 45 COM 7B.104. Natural and Cultural Heritage of the Ohrid region \(Albania/North Macedonia\) \(C/N 99quater\). Riyadh, Kingdom of Saudi Arabia](#).

State of conservation reports by the States Parties

States Parties of the Republic of Albania and the Republic of North Macedonia (2023) [Joint Report of the States Parties to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

States Parties of the Republic of Albania and the Republic of North Macedonia (2024) [Joint Report of the States Parties to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

States Parties of the Republic of Albania and the Republic of North Macedonia (2024) Strategic Recovery Plan for the Natural and Cultural Heritage of the Ohrid region (2023-2030).

State Party of the Republic of Albania (2020) [Report of the State Party to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

State Party of the Republic of Albania (2022) [Report of the State Party to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

State Party of the Republic of North Macedonia (2020) [Report of the State Party to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

State Party of the Republic of North Macedonia (2022) [Report of the State Party to the World Heritage Committee on the state of conservation of the Natural and Cultural Heritage of the Ohrid Region and related annexes](#).

State of conservation reports

(2021) [State of conservation report](#).

(2023) [State of conservation report](#).

Mission reports

ICOMOS (2022) [Report on the ICOMOS Advisory mission to the Natural and Cultural Heritage of the Ohrid region](#). Charenton-le-Pont, France.

UNESCO, ICOMOS and IUCN (2017) [Reactive Monitoring Mission report on the Natural and Cultural Heritage of the Ohrid Region \(Former Yugoslav Republic of Macedonia\)](#). Paris, France and Gland, Switzerland.

UNESCO, ICOMOS and IUCN (2020) [Reactive Monitoring Mission report on the Natural and Cultural Heritage of the Ohrid Region \(North Macedonia / Albania\)](#). Paris, France and Gland, Switzerland).

Documents received from Albania before the mission

- Draft on the Documentation of Cultural Heritage in Lin.
- Initial Notification of the Project Developer: “Preliminary Design for the Rehabilitation of the VIII Railway Corridor, Rogozhinë-Pogradec Section” based on Decision no. 598, dated 1 July 2015 “On Determining the Rules and Procedures for Assessing the Impact on the Cross-Border Environment” [Albanian: Njoftim fillestar i zhvilluesit të projektit: “Projektimi paraprak për rehabilitim e Korridorit të VIII Hekurudhor, seksioni Rogozhinë-Pogradec” bazuar në Vendimin nr. 598, datë 1.07.2015 “Për përcaktimin e rregullave dhe procedurave për vlerësimin e ndikimit në mjedisin ndërkufitar”; English translation provided]
- Detailed Development Plan: Detailed Plan of the Area of National Importance (DPANI) Drilon – Tushemisht, 3 December 2020 [Albanian: Planit i detajuar I zhvillimitë: Planit të detajuar të zones me rëndësi kombëtare (PDZRK) Drilon – Tushemisht, 03.12.2020; English translation provided after the mission].
- Detailed Regulation on the Detailed Plan of the Area of National Importance (DPANI) Drilon – Tushemisht, 3 December 2020 [Albanian: Rregullorja e detajuar e Planit të detajuar të zones me rëndësi kombëtare (PDZRK) Drilon – Tushemisht, 03.12.2020; English translation provided after the mission].
- Preliminary Environmental Impact Assessment Decision to develop the project “Detailed Plan of the Area of National Importance (DPANI) Drilon – Tushemisht, 19 January 2022 [Albanian: Vendim për VNM paraprake për të zhvilluar projektin: “Planit i detajuar I zones me rëndësi kombëtare (PDZRK) Drilon – Tushemisht”; English translation provided after the mission].
- Strategic Environmental Assessment: Detailed Plan of the Area of National Importance Drilon- Tushemisht (DPANI) [Albanian: Vleresimi Strategjik Mjedisor: Planit i detajuar I zones me rëndësi kombëtare (PDZRK) Drilon – Tushemisht; English translation provided after the mission].
- Midwinter Bird Census, 2020, 2021, 2022, and 2024.
- Raport-Inspektimi Kuarci Blace shpk, Shpëtimi shpk, Benaks-94 shpk, FADA 1 shpk dhe ALDI shpk, Benaks-94 shpk, Dollar Oil shpk, JOAL-06 shpk, REJ shpk, JONI 2008 shpk, O Mining shpk, Delda Star shpk, Alarup shpk [Albanian, no English translation provided; *Inspection Report*].

Documents received from Albania after the mission

- **Limited** list of participants with their titles and functions for people the mission team met with during the joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission.
- Decision of Council of Ministers no. 464, dated 26.7.2023 “On The Functioning, Organization And Way Of Developing The Regional Center For Conservation And Restoration”.
- Decision of Council of Ministers no. 30, dated 17.1.2024 “For the Defining the Field of State Responsibility of the Ministry of Economy, Culture and Innovation” [unofficial English translation].
- National Institute of Cultural Heritage Draft Structure.
- Email confirmation that the aquatic Formula 1 in the lake is definitively cancelled.
- Email confirmation that the development construction sent by the World Heritage Centre in the letter dated 21 March 2024 is not planned and will not be implemented.
- Email confirmation that the project to construct a museum on the top of the hill in Drilon is definitively abandoned.
- Email confirmation that there are no quarrying and mining activities still active in the buffer zone.
- Normative Act No. 8, 28 December 2023, For the Taking of Urgent Measures, for the Protection and Improvement of the Infrastructure, for the Treatment of Contaminated Waters that are Discharged near or into Washing Waters [Albanian: Akt normative nr. 8, datë 28.12.2023, Për marrjen e masave urgjente, për mbrojtjen dhe përmirësimin e

infrastrukturës, për trajtimin e ujërave të ndotura që shkarkohen pranë ose në ujëra larëse; English summary provided].

- Udhëzim i përbashket për miratimin e rregullores teknike mbi standardet për trajtimin e ujërave të ndotur për subjektet që shkarkojnë ujëra të ndotur dhe të patrajuara pranë ose në ujëra larës [Albanian, no English translation provided; *Joint Instruction for the Adoption of the Technical Regulation on the Standards for the Treatment of Contaminated Waters for Entities that Discharge Contaminated and Untreated Water near or into Washing Water*].
- Feasibility Study: Wastewater Collection and Treatment Solutions for the Rural Areas of Korça District, Customer and Performance Oriented Drinking Water and Sanitation Services.
- Conclusions of the taskforce that looks into improving the Wastewater Management Treatment Plant.
- Map indicating all buildings connected or planned to be connected with the wastewater management system (centralised plant) for the whole buffer zone.
- Tushemisht Key Plan (map indicating buildings connected with the wastewater management system).
- Plani i përgjithshëm vendor bashkia Pogradec (Plani I zhvillimit) [Albanian, no English translation provided; *General Local Plan of the Municipality of Pogradec (Development Plan)*].
- Plani i përgjithshëm vendor bashkia Pogradec (Rregullore) [Albanian, no English translation provided; *General Local Plan of the Municipality of Pogradec (Regulations)*].
- Plani i përgjithshëm vendor bashkia Pogradec: (Strategjia territoriale) [Albanian, no English translation provided; *General Local Plan of the Municipality of Pogradec (Territorial Strategy)*].
- Pogradec Municipality: Pogradec Water Utility Overview of Services.
- Information about Ohrid's water quality, Local Healthcare Unit (NJVKSh Pogradec).
- Recent photos (with dates) of the waste dump sites located in the buffer zone.
- Pictures of the stretch of the coast where the service road to build the 'tunnel' reaching Pogradec was built.
- Explanatory note about beach use regulations.
- Drilon – Tushemisht Waterscape Park Project: A Retrospective Heritage Impact Assessment for the Drilon – Tushemisht Waterscape Park Project, within the Mixed World Heritage Property 'Natural and Cultural Heritage of the Ohrid Region', Vol. 1 (Report with annexes) & 2 (Photographic Record), February-March 2024.

Documents received from North Macedonia before the mission

- Environmental Impact Assessment Study for the Project for Restoration of Sateska River and Diversion in its Natural Riverbed, Municipality of Debrca, December 2021.
- Law on the Declaration of Ohrid Lake as a Protected Area in Category III – Natural Monument
- Law on the Proclamation of the Locality Studenchiško Blato for a Protected Area in Category IV - Nature Park.
- Excerpt from the Draft Minutes of the fourth [sic] session of the Government of the Republic of North Macedonia, held on January 19, 2021: Item 32: Proposal: Decision on termination of the Decision on establishment of the tourism development zone Ljubanishta 1 [Macedonian, English translation provided].
- Short report from the PSI Hydrobiological Institute on the assessment of the influence of the rivers (Sateska, Koselska and Velgoška) on the quality of water from the littoral zone of Lake Ohrid based on physico-chemical and certain biological parameters, March 2024.
- Correspondence from the Public Enterprise for Railway Infrastructure Railways of Republic of North Macedonia – Skopje to the National Commission for UNESCO on Corridor VIII, March 2023.
- List of invited NGO participants.
- Information from the Public Institution Galichica National Park on the identification of illegal constructions and 4x4 tourism activities in the Park, March 2024.
- Notification of Kolektorski system on the realised progress in accordance with the recommendations of UNESCO (2020-2024).

Documents received from North Macedonia after the mission

- List of participants with their titles and functions for all the people the mission team met with during the joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission.
- Confirmation that the moratorium on constructions has stopped to be in use since the Management Plan for the property has entered into force.
- Confirmation that the initial plans for the Corridor VIII have been abandoned.
- Confirmation that provisions should be taken so that the railway infrastructure and the road infrastructure will be developed in the same track as much as possible to avoid impacting a larger area by creating double tracks.
- Draft Strategic Environmental Assessment Report of the Management Plan for National Park Galichica for the period from 2021-2030, September 2020.
- Short version of the Galichica National Park Management Plan for the Period 2021 – 2030, December 2020.
- Minutes of the second meeting Albania – North Macedonia Joint Fisheries Committee, June 2023.
- Presentation of the Pilot Project for Registration and Removal of Abandoned, Lost and Otherwise Discarded Fishing Nets – Ghost Nets from Lake Ohrid, October 2023.
- IUCN Assessment of the Status of the Species from Lake Ohrid.
- Letter from the Directorate for Protection of Cultural Heritage to National Commission for UNESCO on protective measures for cultural assets and monuments and actions taken against illegally constructed buildings, April 2024.
- Letter from the Municipality of Debrca to the National Commission for UNESCO on wastewater pollution in the Sateska river and data on illegally constructed buildings, April 2024.
- Letter from Kolektorski Sistem to the National Commission for UNESCO on wastewater pollution.
- Letter from the National Institution for the protection of monuments of culture and Museum – Ohrid to the National Commission for UNESCO on Treats and current state 2023-April 2024 for parts that fall under their jurisdiction (cultural heritage protection) No.17-458/2 dated 16/04/2024.

- Letter from the National Institution for the Protection of Monuments of Culture and Museum – Ohrid to the National Commission for UNESCO on Information and mapping of the 19 urban complexes in the Old City of Ohrid with information on the timeframe of their realization, including what is needed to prepare and eventually adopt the details plans for such zones No.17-539/2 dated 25/04/2024.
- Letter from the Public Enterprise for State Roads to the National Commission for UNESCO on Corridor VIII, April 2024.
- Information from the PSI Hydrobiological Institute on the state of conservation of the natural heritage, the interstate management, and the protection of the fish fund, April 2024.
- Letter from Kolektorski Sistem to the Ministry of Culture on the coverage of the collector system for the protection of Lake Ohrid.
- Map for the sewage system with the location of all villages connected, to be connected and not planned to be connected (Kolektorski Sistem).
- Minutes of the emergency session of the Government of the Republic of North Macedonia following the World Heritage Committee containing the 18 conclusions/emergency measures requiring immediate action and defining relevant institutions to implement them as well as progress made already achieved, September 2023 [Macedonian and Albanian; English translation provided].
- Detailed information on the project for a new landfill at Novaci, detailing the collector system in Novaci and the locations and equipment to be used for the transfer stations, as well as an estimated timeframe.
- Information on the status of the Project for the rehabilitation of the Sateska River and its diversion into its natural course [Macedonian; English summary provided].
- Information from the Hydrometeorological Service of the Ministry of Agriculture, Forestry and Water Management on the Fluctuation of the Water Levels of the Ohrid Lake, April 2024.
- Presentation from the Public Institution Galichica National Park on the identification of illegal constructions and 4x4 tourism activities in the Park, March 2024.
- Information on licenses for fish farms, including whether there are any illegal fish farms and the procedure for removing them.
- Decision for Temporary Protection of Studenčišča Marsh from the Ministry of Environment and Physical Planning, June 2021 [Macedonian, English translation provided].
- Catalog of Habitat Types of EU Importance in the Republic of North Macedonia.
- Habitat Map of North Macedonia: Final Report Maneko Solutions, December 2023.
- Report: Lake Ohrid – enlarging the list of hotspots of biodiversity and endemism.
- Report: Biodiversity of diatom algae and macrophyte vegetation in Lake Ohrid.
- Census of birds and large mammals, 2020-2024.
- Census of the goosander, 2019-2023.
- Information from the Ministry of Transport and Culture on the number of building permits requested and issues since the end of the moratorium on constructions.
- Copy of the Memorandum of Understanding between the Republic of North Macedonia, the Republic of Albania and the Republic of Bulgaria for Cooperation in Promoting a Sustainable Infrastructure on Corridor VIII, October 2021.
- Orthophoto map showing urbanization on the Ohrid side of Galichica National Park.
- Information on the preparation of the new Law on the Management of the World Natural and Cultural Heritage of the Ohrid Region and the State of Conservation Reports of the Natural and Cultural Heritage of the Ohrid Region.
- Tabular Overview of the requests and their status for the implementation of the procedure for determining the legal status of illegally constructed buildings.
- List of the detailed spatial planning instruments for non-built-up areas that await approval (their location and content) and those which have been aligned with the rules of the Management Plan and eventually approved.
- Information on the legalization procedure of illegal buildings as well as information of who is responsible for the final decisions and what bodies are asked for opinion before reaching the final decision.

- List of removed and legalized objects by the Municipality of Struga, May 2021-February 2023.
- Information and mapping of the 19 urban complexes in the Old City of Ohrid and information on the time frame of their realization, including what is needed to prepare and eventually adopt the detailed plans for such zones [Macedonian; English translation provided].
- Brief assessment of the state of conservation of the monuments (especially the churches) included in the area and information on all conservation projects that have been completed since 2020 or that are planned [Macedonian; English translation provided].
- Inventory of illegal buildings, Municipality of Ohrid [Macedonian].
- Draft Tourism Development Strategy 2020-2025, Municipality of Ohrid, 2020 [Macedonian].
- Satellite pictures of Galichica National Park.

ANNEX VII: Documents requested from the States Parties by the mission team after the mission

Albania

1. List of participants with their titles and functions for all the people the mission team met with during the joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission.
2. Confirmation that the aquatic Formula 1 in the lake is definitively cancelled.
3. Confirmation that the development construction sent by the World Heritage Centre in the letter dated 21 March 2024 is not planned and will not be implemented. (For ease of reference please find the wetransfer link transmitting the video with the proposed project here: <https://we.tl/t-8RARUhqGMm>).
4. Inventory for cities and villages of residential and commercial/touristic buildings that are not connected to the wastewater management system. Plans for the wastewater management system planned to connect residential buildings with the wastewater management plant in Bucimas or any other centralized plant.
5. Maps indicating all buildings connected or planned to be connected with the wastewater management system (centralized plant) for all the buffer zone.
6. Conclusions of the taskforce that looks into improving the Wastewater management treatment plant.
7. Frequency and minutes of the meetings of the transboundary committee, established in 2021 by the Ministers of Culture of both States Parties.
8. Regulation establishing that new constructions for commercial use are obliged to be equipped with their own wastewater management system and the timeframe by which this new provision is expected to be fulfilled. What would be the provisions to make the private sector comply with this provision by the expected timeframe.
9. Confirmation that the project to construct a museum on the top of the hill in Drilon is definitively abandoned.
10. Detailed list of quarrying and mining activities still active and their dump sites located in the buffer zone.
11. Confirmation and recent photos (with dates) on the waste dump sites located in the buffer zone.
12. Link to access the approved general Local Plan of Pogradec (the Master Plan).
13. Confirmation that the initial plans of using the Lin tunnel by the railway Corridor VIII to connect to North Macedonia are definitively abandoned.
14. Clarifications on how the Ministry of Culture is organized and functioning within the structure of the new Ministry of Economy, Culture and Innovation and how and when the UNESCO section will be fully operating. Information on the number of current staff members compared with the estimated needed number of staff members, including for the National Institute of Cultural Heritage.
15. Information in English on beach use regulations, including permitted and non-permitted uses, restrictions, timeframe for temporary installations (when they can be installed, when they are to be removed), examples of structures that have been approved or denied and a list of temporary structures that have been removed voluntarily by the concessionaires and for which the municipality has had to intervene, list and pictures of structures that are still to be removed since summer of 2020.
16. Information on the lake, such as (but not limited to) water quality, benthic fauna, fish population, including where the samples were taken. The information should include short clear overview of the past (since 10-15 years), current situation and also expected future tendency.
17. The draft report for the proposal to declare the village of Lin 'protected landscape'.
18. Pictures of the stretch of the coast where the service road to build the 'tunnel' reaching Pogradec was built – to ascertain the level of recovery of this stretch of lake coast.

19. Information and map related to the building permit and the construction of the new development grown in Tushemisht at the eastern edge of the village and areas where development is not allowed, e.g. due to biodiversity conservation.
20. Summary of regular monitoring (e.g. census) of mammals (especially large predators) for the last 5 years, similar to the summary of regular birds monitoring sent recently. Focus on bio-indicative species⁸.
21. Information and map of biodiversity hot-spots⁹ in the area of the World Heritage property and its buffer zone, including in areas that are not protected areas).
22. Information on the already removed illegal constructions (list and map) as well as photos of removed illegal constructions where soil and vegetation were also restored¹⁰.
23. Information (description and map) on the segments of undeveloped parts of the Ohrid lake coast where biodiversity is not impacted by construction or other human activities with a primary focus on the rare biotopes and biotopes degraded in the past but that still have the potential and capacity to host interesting biodiversity such as drained and abandoned wetlands, areas where forest was logged out, etc.
24. Information and map on already constructed and planned facilities supporting biodiversity movement e.g. eco-bridges, underpasses. If these are not present send draft plan of this process (e.g. identification of the critical migration crossings, consultation with the World Heritage Centre, fundraising and construction, etc.).¹¹

North Macedonia

1. List of participants with their titles and functions for all the people the mission team met with during the joint World Heritage Centre/IUCN/ICOMOS Reactive Monitoring mission.
2. Map for sewage system with the location of all villages connected, to be connected and not planned to be connected with a timeframe estimation for completion. For those who will not be connected, information on what alternative solution is planned with timeframe of completion.
3. Confirmation that the moratorium on constructions has stopped to be in use since the Management Plan for the property has entered into force. Information on the number of building permits requested and issued since the end of the moratorium.
4. Minutes or Report of the emergency session convened in September 2023 following the World Heritage Committee containing the 18 conclusions /emergency measures requiring immediate action and defining relevant institutions to implement them as well as progress already achieved.
5. Copy of the Memorandum of Understanding between North Macedonia and Albania that both countries will look for an alternative for the railway Corridor VIII and information on the different phases to be undertaken.
6. Confirmation that the initial plans for the Corridor VIII have been abandoned.
7. Confirmation that provisions should be taken so that the railway infrastructure and the road infrastructure will be developed in the same track as much as possible to avoid impacting a larger area by creating double tracks.

⁸ Bioindicative species are organisms whose presence, abundance, or health status can provide information about the environmental conditions of an ecosystem.

⁹ Biodiversity hotspots are critical outside protected areas because they often overlap with regions of high human population density and extensive land use change. Protecting biodiversity hotspots outside protected areas helps conserve unique species and ecosystems, preserving biodiversity in these areas, maintaining ecological balance, resilience and support sustainable development.

¹⁰ Restoring land and biotopes after the removal of illegal constructions helps to reverse environmental damage caused by such constructions, promotes the recovery of native ecosystems and biodiversity, enhances ecosystem services, such as soil stability and water filtration, and contributes to the biodiversity conservation. Moreover, restoration supports compliance with environmental regulations and fosters community stewardship of natural resources.

¹¹ Eco-bridges and underpasses on heavily used roads are crucial for biodiversity because they provide safe passages for wildlife to crossroads, reducing the risk of vehicle collisions and fragmentation of habitats. These structures help maintain genetic diversity, promote species dispersal, and enhance overall ecosystem resilience. They also contribute to the conservation of vulnerable species and mitigate the negative impacts of road infrastructure on biodiversity.

8. Summary (text and map) of proposed biodiversity protection infrastructure such as safe bridges and passages for wildlife to cross newly build road and railway.
9. Information on the project of railway construction between Trebenishta and Struga.
10. Detailed information on the project to have a new landfill at Novalci thus closing the landfills in Bukovo and Struga, detailing the collector system in Novalci and the locations and equipment to be used for the transfer stations, as well as estimated timeframe.
11. Information and timeline on the diversion of the Sateska river and recent photos of the current riverbed and the diversion area that is being planned as well as of the area cleaned from the sediments and other remains after previous reclamation and construction activities. Information on the Action plan that will define the responsibilities of each of the institutions concerned and submission of this Plan or its outline (if ready).
12. Regarding the fluctuations in the water levels of the lake due to the hydropower plant operations, of the power plant, detailed data should be provided through regular monitoring, taking into account factors such as (the length of high or low water levels, the time of year in which these changes take place) and to correlate them with the influence of coastal ecosystem.
13. Inventory with map of the legal and illegal existing buildings and new constructions in the Studenshichte Marsh and the Galichica National Park. List with timeframes for demolition of illegal buildings, including a map.
14. Detailed information on the reasons why the construction project of the hotel in Lagadin has not been stopped. Plans of the hotel and identification of mitigation measures (if any).
15. Information and mapping of the 19 urban complexes in the Old City of Ohrid and information on the timeframe of their implementation, including what is needed to get the detailed plans for such zones developed and eventually adopted.
16. The list and the map of the detailed plans adopted by the Municipality of Ohrid and Struga, as well as a separate list of zones already aligned with the Management Plan rules.
17. The list of the detailed spatial planning instruments for non-built-up areas that await approval (their location and content) and those which have been aligned with the rules of the Management Plan and eventually approved.
18. The presentation that was presented to the mission team regarding the Galichicha Nature Park.
19. Inventory of illegal buildings (buildings that have permit problems), detailing even roughly the type of illegality, mapping (if available) and status of demolitions and legalizations (how many legalized and for what reasons, how many are pending) since 2020.
20. Information on the buildings' legalization procedure as well as information of who is responsible for the final decisions and what bodies are asked for opinion before reaching the final decision.
21. Information on licenses for fish farms, including whether there are any illegal fish farms and the procedure for removing them (if available).
22. The Draft Tourism Development Strategy 2020-2025 prepared by the Municipality of Ohrid.
23. Building permits issued by Struga (or any other authorizing authority) for the stretch of coast between Kalishta, Radozhda and the border between Albania and North Macedonia.
24. Brief assessment of the state of conservation of the monuments (especially the churches) included in the property and information on any conservation projects that were completed since 2020 or being planned.
25. The draft Laws that are currently being in process for adoption (except for the two Laws that were sent before the mission takes place, namely the Law on the Declaration of Lake Ohrid and the one on the proclamation of Studenshichte Marsh).
26. Summary of regular monitoring (e.g. census) of birds and mammals (especially large predators) for the last 5 years, similar to the summary of regular birds monitoring sent recently. Focus on the bio-indicative species¹².
27. Information (description and map) on the segments of undeveloped parts of the Ohrid lake coast where biodiversity is not impacted by construction or other human activities with a

¹² Bioindicative species are organisms whose presence, abundance, or health status can provide information about the environmental conditions of an ecosystem.

primary focus on the rare biotopes and biotopes degraded in the past but that still have the potential and capacity to host interesting biodiversity such as drained and abandoned wetlands, areas where forest was logged out, etc.

28. Information and map of biodiversity hot-spots¹³ in all the area of the World Heritage Property (besides the protected areas such as the Galichica Nature Park and the Studenshichte Marsh).
29. Information and map on already constructed and planned facilities supporting biodiversity movement e.g. eco-bridges, underpasses. If these are not present send draft plan of this process (e.g. identification of the critical migration crossings, consultation with World Heritage Centre, fundraising and construction, etc.).¹⁴
30. Information on the already removed illegal constructions (list and map) as well as photos of removed illegal constructions where soil and vegetation was also restored¹⁵.

¹³ Biodiversity hotspots are critical outside protected areas because they often overlap with regions of high human population density and extensive land use change. Protecting biodiversity hotspots outside protected areas helps conserve unique species and ecosystems, preserving biodiversity in these areas, maintaining ecological balance, resilience and support sustainable development.

¹⁴ Eco-bridges and underpasses on heavily used roads are crucial for biodiversity because they provide safe passages for wildlife to crossroads, reducing the risk of vehicle collisions and fragmentation of habitats. These structures help maintain genetic diversity, promote species dispersal, and enhance overall ecosystem resilience. They also contribute to the conservation of vulnerable species and mitigate the negative impacts of road infrastructure on biodiversity.

¹⁵ Restoring land and biotopes after the removal of illegal constructions helps to reverse environmental damage caused by such constructions, promotes the recovery of native ecosystems and biodiversity, enhances ecosystem services, such as soil stability and water filtration, and contributes to the biodiversity conservation. Moreover, restoration supports compliance with environmental regulations and fosters community stewardship of natural resources.

ANNEX VIII: National management systems for the preservation and management of the property

National legislation in Albania

- Law 27/2018 on Cultural Heritage and Museums, Official Gazzette no. 86, 2018, <https://kultura.gov.al/ligje-4/>
- Decision of Council of Ministers No. 554, dated 18.6.2015 on the Proclamation of the Historical Center of the City of Pogradec and the approval of the Regulations for its administration, Official Gazzette no. 115, 2015, https://kultura.gov.al/wp-content/uploads/2017/12/VKM_nr_554.pdf
- Decision of Council of Ministers no. 1125, dated 30.12.2020 "On the approval of the design rules, the implementation of conservation and protective intervention works in material cultural assets, their supervision and approval"
- Decision of Council of Ministers no. 1040/2020 "On determining the rules for implementing the legalization criteria and approving the model of the legalization act for constructions without a permit"
- Decision of Council of Ministers no. 220, dated 7.4.2021 "On determining the procedures for archaeological research, the special conditions for issuing the permit, accompanying documents, as well as the procedures for reviewing or cancelling the permit for conducting archaeological research"
- Decision of Council of Ministers no. 464, dated 26.7.2023 "On The Functioning, Organization And Way Of Developing The Regional Center For Conservation And Restoration" <https://qbz.gov.al/eli/vendim/2023/07/26/464/26c28036-e2db-430a-a4e1-cdba0b0134d4;q=qendra%20rajonale%20e%20konservmit%20dhe%20restaurimit>
- Decision of Council of Ministers no. No. 425, dated 27.5.2020 "On the selection procedures of subjects equipped with license to design, implement, supervision and validation in cultural property, for making investments with funds public in cultural property" amended
- National Strategy for Culture 2019-2025, <https://www.kultura.gov.al/programi-i-kultures-2019-2025/>
- Law 107/2014 On territory planning and development, <https://planifikimi.gov.al/index.php?id=162p>
- General Local Plan of the Municipality of Pogradec, approved by National Territorial Council no. 5, date 27.07.2022, <https://planifikimi.gov.al/index.php?id=732>
- Supplement to the Management Plan for the Pogradec Protected Landscape 2017-2027 approved by Order of the Minister of Environment no. 2026, dated 31.12.2014 https://turizmi.gov.al/wp-content/uploads/2018/05/Suplementi_PM_Ohrit_shqip-final_10.8.2017-clear.pdf
- Decision of Council of Ministers No. 402, dated 20.5.2020 "On the approval of the policy document "for the governance of the geospatial information sector in albania, 2020-2030"
- Decision of Council of Ministers No. 459, dated 16.6.2010 "On the approval of common geodesic and gis standards"

Legislation in North Macedonia

- Constitution of the Republic of North Macedonia ("Official Gazette of the RNM" no. 52/91, 01/92, 31/98, 91/01, 84/03 and 107/05) and the Constitutional Law of the Republic of Macedonia ("Official Gazette of the RM" no. 52/91 and 4/92).
- Law on Environment ("Official Gazette of the RNM" no. 53/05, 81/05, 24/07, 159/08, 83/09, 48/10, 124/10, 51/11, 123/12, 93/13, 187/13, 42/14, 44/15, 129/15, 192/15, 39/16, 99/18) and relevant bylaws. Available at: <https://www.moepp.gov.mk/>.
- Law on Managing the World Natural and Cultural Heritage of the Ohrid Regio ("Official Gazette of the RM" 75/10). Available at: <http://arhiva.kultura.gov.mk/>.
- Law on Nature Protection ("Official Gazette of the RNM" no. 67/04, 14/06, 84/07, 35/10, 47/11, 148/11, 59/12, 13/163, 163/13, 146/15, 39/16, 63/16) and accompanying bylaws. Available at: <https://www.moepp.gov.mk/>.
- Law on Cultural Heritage Protection ("Official Gazette of the RM" 20/04, 115/07, 18/11, 148/11, 23/13, 137/13, 38/14, 44/14, 199/14, 154/15, 39/16, 11/18 and 20/19). Available at: <http://arhiva.kultura.gov.mk/>.
- Law Declaring the Old City Core of Ohrid as a Cultural Heritage of Particular Importance ("Official Gazette of the RM" 47/2011, 154/2015). Available at: <http://arhiva.kultura.gov.mk/>.
- Law on Waste Management ("Official Gazette of the RNM" no. 68/04, 71/04, 107/07, 102/08, 134/08, 09/11, 51/11, 123/12, 163/13, 51/15, 146/15, 156/15, 192/15, 39/16, 63/16, 31/20, 216/21) and accompanying bylaws.
- Law on Waters ("Official Gazette of the RNM" no. 87/08, 6/09, 161/09, 51/11, 44/12, 163/13, 180/14, 52/16) and accompanying bylaws. Available at: <https://www.moepp.gov.mk/>.
- Law on Ambient Air Quality ("Official Gazette of the RNM" no. 67/04, 92/07, 35/10, 47/11, 51/11, 100/12, 163/13) and accompanying bylaws.
- Law on Protection against Environmental Noise ("Official Gazette of the RNM" no. 79/2007, 124/10, 47/11, 163/13) and accompanying bylaws.
- Law on Social Protection ("Official Gazette of the RNM" no. 79/09, 148/13, 164/13, 187/13, 38/14, 44/14, 116/14, 180/14, 33/15, 72/15, 104/15, 150/15, 173/15, 192/18, 30/16, 163/17, 51/18).
- Law on Health Protection ("Official Gazette of the RNM" no. 43/12, 145/12, 87/13, 164/13, 39/14, 43/14, 132/14, 188/14, 10/15, 61/15, 154/15, 132/15, 154/15, 192/15, 37/16).
- Law on Public Health ("Official Gazette of the RNM" no. 22/10, 136/11, 144/14, 149/15, 37/16).
- Law on Environmental Inspection ("Official Gazette of the RNM" no. 99 dated 21.4.2022).
- Law on Museums ("Official Gazette of the RNM" no. 66/04, 89/08, 116/10, 51/11, 88/15, 152/15 and 39/16). Available at: <http://arhiva.kultura.gov.mk/index.php/legislativa/2011-03-04-10-39-07/290-zakon-za-muzeite>.
- Law on Construction ("Official Gazette of the RNM", no. 70/13, 79/13, 137/13, 163/13, 27/14, 28/14, 42/14, 115/14, 149/14, 187/14, 44/15, 129/15, 217/15, 226/15, 30/16, 31/16, 29/16, 71/16, 132/16, 35/18, 64/18, 168/18, 244/19 and 18/20). Available at: <https://www.komoraoui.mk/>.
- Law on Urban Planning ("Official Gazette of the RNM" 32/20). Available at: <https://www.komoraoui.mk/>.
- Law on Spatial and Urban Planning ("Official Gazette of the RM" 199/14, 44/15, 193/15, 31/16, 163/16, 90/17, 64/18 and 168/18). Out of force. Available at: <https://ener.gov.mk/>.

ANNEX IX: Indicative maps of national and international programmes under which the property is recognised, other than the World Heritage Convention

Disclaimer: the maps provided in this Annex are indicative and cannot in any way be considered official.

