

ICOMOS

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

Our Ref. GB/AR/1201rev_IR

Charenton-le-Pont, 19 December 2024

H.E. Ms Naomi Aretha Ngwira
Ambassador, Permanent Delegate
Permanent Delegation of the Republic of Malawi
to UNESCO
Ambassade du Malawi
Avenue Herrmann-Debroux 46
Bruxelles 1160, Belgium

World Heritage List 2025

Mount Mulanje Cultural Landscape (MMCL) (Malawi) – Interim report and additional information request

Dear Ambassador,

As prescribed by the *Operational Guidelines for the Implementation of the World Heritage Convention* and its Annex 6, the Advisory Bodies have to submit a short interim report for each nomination by 31 January 2025. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation procedure.

The ICOMOS technical evaluation mission to “Mount Mulanje Cultural Landscape (MMCL)” was carried out by Mr. Simon Makuvaza (Zimbabwe) in August 2024. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organisation and implementation of the mission.

On 20 September 2024, an additional information letter was sent by ICOMOS to request further information regarding the cultural landscape, the tangible expressions of intangible cultural heritage, integrity, the regional status, the comparative analysis, protection, land ownership and land uses, threats, and the management of the nominated property. Please convey our thanks to all the officials and experts for the additional information you provided on 11 November 2024 and for their continued cooperation in this process.

At the end of November 2024, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2025. The additional information provided by the State Party, together with the mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2025.

We thank you and your Delegation for your availability and your participation in the meeting held on 26 November 2024 with some representatives of the ICOMOS Panel. The exchanges during this meeting were of great help for the third part of the ICOMOS Panel meeting. During this last part of the meeting, the Panel has identified areas where it considers that further information is needed.

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

Maps

ICOMOS notes that the boundaries of the nominated property have been established largely based on the perimeters of the Mulanje Mountain Forest Reserve as well as the Mount Mulanje Biosphere Reserve. However, it appears that the boundaries do not correspond fully to either of them. So far, it has not been possible to confirm with the State Party where the perimeter of the Biosphere Reserve ends and its transition, and where the buffer zones begin, to understand how the proposed boundaries of the nominated property correspond to them. Therefore, ICOMOS would like to reiterate the request for an appropriate map showing the perimeters of the Mulanje Mountain Forest Reserve, and of the Mount Mulanje Biosphere Reserve with its buffer zone and the transitional zone, to understand the relation of these reserves to the proposed boundaries of the nominated property.

ICOMOS would also appreciate if the State Party could confirm the land area of the nominated property, as the figures in the nomination dossier are inconsistent.

Furthermore, ICOMOS would like to reiterate its request for a map of land ownership and land uses within the nominated property and around it, which the State Party agreed to provide in the additional information received by ICOMOS in November 2024.

Buffer zone

ICOMOS further notes the proposal of the State Party not to establish a buffer zone, as the road encircling the nominated property has been said to represent a clear limit and constitute a natural barrier with buffering mechanisms in place. However, ICOMOS considers that the infrastructure surrounding the nominated property, while representing a natural barrier, provides easy access to the nominated property from all directions, increasing challenges for enforcing rules against encroachment and illegal uses. The current challenges in controlling the encroachment of farming into the nominated property despite the mechanisms in place, as well as the high risk of fires caused by human factor, suggest that the protection within the nominated property itself and the existing buffering mechanism are ineffective and do not provide a comprehensive coverage against negative impacts, given the vast size of the nominated cultural landscape. This is evident in the persistent illegal extraction of resources and charcoal burning. Moreover, the existing land uses and private ownership of land immediately outside the nominated property do not necessarily prevent the surroundings of the Mount Mulanje Cultural Landscape (MMCL) from developments that could potentially have negative impacts on the nominated property, such as expansion of commercial farming that would produce pollution and noise. The density of the areas surrounding the nominated property will add to the development pressures on the entire area.

Therefore, ICOMOS would like to enquire whether the State Party would consider creating a formal buffer zone with specific regulations that would provide an additional layer of protection to the nominated property to control the development pressures around the nominated cultural landscape. If so, could the State Party please provide a revised map showing the buffer zone, and indicate the envisaged timeframe for its completion? In requesting information about the possibilities of creating a formal buffer zone, ICOMOS is fully aware that there are important legal and practical issues to resolve, and that the added buffer zone would not be in place prior to the completion of the ICOMOS evaluation. What is sought here is an indication of the ability of this addition to be considered, and the likely timeframe for its implementation.

Threats

(1) Mining

Although the management plan for the nominated property is being developed on the assumption that any mining activities will not go forward, the required legislation prohibiting extractive industries within

the nominated property is lacking and the threat that mining poses to the cultural landscape of Mount Mulanje is yet to be addressed by the State Party. Moreover, ICOMOS notes that in 2014 the World Heritage Committee which deferred the previous nomination of the “Mount Mulanje Cultural Landscape” requested the State Party to “*prohibit mining activity in the property and carry out an impact study on any new project that may affect the integrity of the site prior to any new nomination*”.

Accordingly, ICOMOS would like to better understand what steps have been undertaken by the State Party since 2014 to fulfill this recommendation of the World Heritage Committee, and whether the State Party could demonstrate at this stage commitments to that effect. Does the State Party envisage legal or procedural changes that would guarantee that no extractive industries will be allowed within the nominated property to ensure its integrity?

(2) Tourism

ICOMOS notes that the State Party has been actively pursuing development of tourism in the area by planning expansion of tourism facilities, while there are no studies that would assess the cultural and ecological impacts of growing tourism on the nominated property. ICOMOS would therefore be interested to learn more about the plans of the State Party in this regard. What are the formal controls in place or that would be implemented to protect the sacredness of the nominated cultural landscape? With regard to the development of tourism, what kind of consultations have been undertaken with the local communities who are the traditional custodians of the nominated cultural landscape? And does the State Party plan to exclude certain areas – sacred places, shrines, or some particularly fragile or venerated sites – from tourism to ensure that their sacredness would be preserved and that local communities whose cultural practices and beliefs sustain it would be able to retain control over them?

Development projects

ICOMOS acknowledges that the State Party plans to construct a visitor reception and information centre. However, no details about this planned project have been shared by the State Party in the nomination dossier or any additional documents. ICOMOS would like to learn more about this project. Is the visitor reception and information centre planned within the nominated property or outside it? ICOMOS would also appreciate to know more about any other development projects, including any new planned constructions related to tourism and infrastructure development within the nominated area and in the immediate vicinity. Could the State Party please provide a map with locations of the planned constructions?

ICOMOS would also like to know more about the stage of each of these projects and whether Heritage Impact Assessment, Environmental and Social Impact Assessments have been conducted to ensure that no negative impacts are exercised on the cultural and natural resources, and that potential adverse social impacts are eliminated.

Finally, ICOMOS would like to further seek clarity on whether Heritage Impact Assessment has been made a legal requirement for any development projects within the nominated property and its surroundings.

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

We would be grateful if you could provide **ICOMOS** and the **World Heritage Centre** with the above requested information by **28 February 2025 at the latest**, the deadline set out in paragraph 148 of the *Operational Guidelines for the Implementation of the World Heritage Convention* concerning additional information on nominations to be received. Please note that any information submitted after this statutory

deadline will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any additional information submitted within the statutory deadline, it will not be possible to properly evaluate a completely revised nomination or a large amount of new information submitted at the last minute. ICOMOS would therefore be grateful if the State Party could keep its response concise and respond only to the above requests.

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

Yours faithfully,



Gwenaëlle Bourdin
Director
ICOMOS Evaluation Unit

Copy to Department of Museums and Monuments of the Ministry of Local Government,
Unity and Culture
UNESCO World Heritage Centre