ICOMOS

2025

Evaluations of Nominations of Cultural and Mixed Properties

ICOMOS report for the World Heritage Committee

47th ordinary session of the World Heritage Committee Paris, France / 6-16 July 2025

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2025

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I Introduction

ICOMOS Analysis of nominations

In 2025, ICOMOS was called on to evaluate 41 nominations.

They consisted of:

22 new nominations

2 deferred nominations

1 referred back nomination

16 minor modifications to the boundaries

The geographical spread is as follows:

Africa

Total: 2 nominations, 2 countries 1 new nomination 1 deferred nomination (2 cultural properties)

Arab States

Total: 2 nominations, 2 countries 1 new nomination 1 minor modification to the boundaries (2 cultural properties)

Asia and the Pacific

Total: 12 nominations, 11 countries
11 new nominations
1 minor modification to the boundaries
(11 cultural properties, 1 mixed property)

Europe and North America

Total: 20 nominations, 11 countries 8 new nominations 12 minor modifications to the boundaries (20 cultural properties)

Latin America and the Caribbean

Total: 5 nominations, 4 countries
1 new nomination
1 deferred nomination
1 referred back nomination
2 minor modifications to the boundaries
(5 cultural properties)

ICOMOS notes the weak representation of certain regions in the submissions, particularly Africa, Latin America and the Caribbean and the Arab States.

General remarks

Since 2023, an important change has been introduced in the ICOMOS evaluation procedure, to ensure a more geographical balanced representation of its World Heritage Panel members. The Panel of the 2024/2025 cycle was composed by 20% of members from each of the five regions. Moreover, in the framework of partnerships between ICOMOS and respectively the African World Heritage Fund (AWHF) and the Arab Regional Centre for World Heritage (ARC-WH), ten ICOMOS African and Arab experts received funding to participate in person to the November 2024 Panel meeting. ICOMOS hopes these fruitful collaborations will continue in order to maintain a balanced regional representation in accordance with the standards of the evaluation procedure.

ICOMOS thanks its experts from National Committees, International Scientific Committees and Board members who provide significant support on a voluntary basis to the work that is delivered.

1. Quality and complexity of nomination dossiers

Generally speaking, ICOMOS notes that certain nominations would benefit if more time were taken in preparation to, for example, undertake additional research, complete the legal protection process, or finalise a management plan.

ICOMOS recalls the Resource Manual *Preparing World Heritage Nominations*. An electronic version is available on its website and on the World Heritage Centre website. The Manual is at the disposal of States Parties to assist them in the preparation of nomination dossiers.

When evaluating the comparative analysis included in a nomination dossier, ICOMOS examines the methodology used by the State Party and the relevance of the examples against a set of parameters. Comparisons with the nominated property should be drawn with sites expressing the same values, and within a defined geo-cultural area. Therefore, the values need to be clearly defined and the geo-cultural framework should be determined according to those values. Comparisons should be drawn with similar properties already inscribed on the World Heritage List and with other examples at the national and international level within the defined geo-cultural area.

On this basis, ICOMOS indicates whether or not the

comparative analysis is adequate; and whether or not, the analysis justifies consideration of the nominated property for the World Heritage List.

If the nomination is considered incomplete or insufficient according to the parameters indicated above, ICOMOS takes several actions. It requests additional information from the State Party; checks relevant ICOMOS thematic studies; examines the wealth of information available about properties already evaluated and/or inscribed on the World Heritage List, and on the Tentative Lists; and, consults international experts (belonging or not to the ICOMOS network) to improve its understanding of the nomination.

ICOMOS wishes to point out that its role is to evaluate the nominated properties based on the information provided in the nomination dossiers, and on the basis of technical evaluation missions and desk reviews by ICOMOS experts as well as additional international studies. Similarly, ICOMOS evaluates the protection, conservation and management of the nominated properties at the time of their nomination and not in the future after the adoption of proposed laws and management plans. It is thus the duty of ICOMOS to indicate to the World Heritage Committee if adequate protection and management are in place prior to inscription.

2. ICOMOS evaluations

The objective of ICOMOS is the conservation and long-term protection and presentation of cultural heritage, based on whether or not it is of Outstanding Universal Value. In formulating its recommendations, ICOMOS seeks to be as helpful as possible to the States Parties, regardless of the proposed final recommendations.

Despite being sometimes under considerable pressure, ICOMOS remains rigorous and scientific, and its first duty remains the conservation of properties.

ICOMOS also notes that the dialogue developed with the States Parties during the evaluation procedure is often very helpful in resolving issues and difficulties. In many cases, it contributes to the adoption of the final recommendations made by ICOMOS. However, the current timeframe does not provide enough time for dialogue when the issues are complex.

3. Referral and deferral of nominations

ICOMOS wishes once again to express its concerns about the difficulties raised when a recommendation for deferral is changed into a recommendation for referral. This action does not allow the Advisory Bodies to carry out an appropriate evaluation of nominations which are in many cases "resubmitted" as entirely new ones. The changes to the *Operational Guidelines for the Implementation of the World Heritage Convention* to clarify these concepts might assist on how these recommendations are used.

In its recommendations, ICOMOS clearly distinguishes between nominations which are recommended to be referred back and those which are recommended to be deferred. In the case of a referral, criteria have been justified, and conditions of authenticity and integrity have been met to the satisfaction of ICOMOS. Additional information must be supplied to satisfy other requirements of the Operational Guidelines for the Implementation of the World Heritage Convention, but no further technical evaluation mission will be required. In case of a deferral, the very nature of the additional information requested (e.g., a more thorough study, a major reconsideration of boundaries, a request for a substantial revision, or serious gaps in regard to management and conservation issues) means that a new technical evaluation mission and examination by the full ICOMOS World Heritage Panel are required. It therefore takes some time to rework and complete the nomination, to evaluate it again and to ensure that it receives the attention it needs to progress.

4. Minor modifications to the boundaries

These requests originate either from monitoring, the retrospective inventory or Periodic Reporting.

ICOMOS notes that all modifications to the boundaries of a property and its buffer zone are proposed as "minor" modifications, even when they constitute, in fact, substantial modifications to the boundaries of the property, or even in some cases an extension of the property.

According to the *Operational Guidelines for the Implementation of the World Heritage Convention*, proposals for significant modifications to the boundaries, whether extensions or reductions, constitute a new nomination (paragraph 165). ICOMOS would recommend that this provision be applied systematically and rigorously by the World Heritage Committee.

ICOMOS would also like to suggest that consideration be given to extending the calendar for the evaluation of these requests, in particular when they concern the creation of a buffer zone, in order to bring it into line with the calendar in force for new nominations, which would open up the possibility of dialogue and exchange of information with the States Parties.

5. Serial nominations and significant modifications to the boundaries

ICOMOS recalls that a change in the approach to serial properties was endorsed by the revision of the Operational Guidelines for the Implementation of the World Heritage Convention (paragraph 137) in November 2011. Serial nominations should not consist merely of a catalogue of sites, but should instead concern a collection or ensemble of sites with specific cultural, social or functional links over time, in which each site contributes substantially to the Outstanding Universal Value of the serial property as a whole.

ICOMOS wishes to encourage the States Parties to consider the implications of this change when preparing serial nominations.

This year, ICOMOS has examined fifteen serial nominations, including around 150 monuments, ensembles and sites. These nominations require a more substantial investment in terms of human and financial resources at all levels of the evaluation procedure. The increase in the number of serial nominations needs to be taken into account in the budgets and contracts. Furthermore, ICOMOS notes that there are also considerable pressures on keeping to the statutory calendar, as a result of the heavier workload involved in evaluating these large and complex serial nominations.

6. Development projects

ICOMOS points out the newly published *Guidance and Toolkit for Impact Assessments in a World Heritage Context* developed by the Advisories Bodies and the World Heritage Centre. ICOMOS encourages States Parties to incorporate a Heritage Impact Assessment approach into the management system of their nominated properties. This will ensure that any programme, project or legislation regarding the property be assessed in terms of its consequences on the Outstanding Universal Value and its supporting attributes.

Based on recent experiences where information had not been shared in an adequate manner, ICOMOS reiterates its concerns related to the need to identify development projects within nominated properties during the evaluation cycle, and to bring to ICOMOS' attention any development projects that are planned within the nominated property or in its vicinity, to ensure that comprehensive information is received concerning these potential projects. ICOMOS once again suggests that, as part of the evaluation procedure, the World Heritage Committee should apply provisions similar to those stipulated in paragraph 172 of the *Operational Guidelines for the*

Implementation of the World Heritage Convention, inviting the States Parties to inform the Committee of "their intention to undertake or to authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property [...]".

7. Cultural landscapes

ICOMOS notes some challenges and trends emerging in nominations regarding how the cultural landscape category is applied. ICOMOS considers this category as an opportunity to enhance the balance of the World Heritage List; however, how it is defined and translated into nomination strategies does not harness its full potential. Often, the different types of cultural landscapes (designed and created intentionally by people, organically evolved, and associative) are not well understood or apprehended by the justification for inscription, the identification of attributes, or the related management implications. One example is what is often called an "evolving landscape" where the idea of an organically "evolved landscape" is merged with that of a "continuing landscape". This merging leads to nominations that suggest that more or less everything in the property could continue to evolve over time. While it is desirable that continuing cultural landscapes play an active role in contemporary society, for this to happen in a way that sustains Outstanding Universal Value, there needs to be a clear understanding of which parts of the evolutionary process may evolve, how, at which pace, and what aspects should be maintained.

Some nominations that are conceived as cultural landscapes feature properties compounding evidence of multiple cultural/chronological periods, diverse types of sites and monuments and multiple, unrelated narratives, leading to proposals that lack clear and consistent argumentation to support the potential Outstanding Universal Value of the property. In other cases, the cultural landscape category is applied to properties, the reality of which and its attributes are very different.

Sometimes, there might be insufficient documentation available about a site and its historical development to understand the significance of the landscape dimension or the way in which the territory has been shaped by human intervention, in such a way that the outcome of this intervention can be considered outstanding under the cultural landscape category. In such situations, ICOMOS encourages using the landscape approach in the management of the property, for instance, by taking into consideration the importance of the geomorphology of the territory and the reciprocal relation of its elements to the specific topographical, geographical, natural and human-made

features and among each other, including, but not limited to, the intervisibility between these elements. ICOMOS notes that the potential of the cultural landscape category to maintain biodiversity at sites and to foster interlinkages between cultural and natural heritage would be worth further exploration.

Considering the issues mentioned above, ICOMOS observes that some further reflection on how to enhance the application of the cultural landscape category to contribute to the representativity of the World Heritage List and the transmission of outstanding cultural landscapes to the future generations would be needed.

8. Upstream process

ICOMOS has been active in extending its collaboration with States Parties on upstream work, with the World Heritage Centre and IUCN on how to address upstream requests in a more systematic and efficient manner, and on the development of Tentative Lists.

ICOMOS wishes to draw attention to paragraph 122 of the Operational Guidelines for the Implementation of the World Heritage Convention which invites States Parties to "contact the Advisory Bodies and the World Heritage Centre at the earliest opportunity in considering nominations to seek information and guidance", and in particular the relevance of this paragraph in connection with the preparation of the nomination dossier for mixed properties and transnational serial properties.

In addition, ICOMOS has elaborated with the assistance of IUCN, ICCROM and the UNESCO World Heritage Centre, a "Guidance on Developing and Revising World Heritage Tentative Lists" within the context of the ongoing reform of the Nomination Process.

This document responds to an increasing need of basic guidance for States Parties when developing and revising their Tentative Lists. On its first part, the Guidance presents and explains the basic concepts around the Tentative Lists within the context of the nomination and Upstream processes. It identifies the key steps for preparing and revising Tentative Lists, as well as the stages where the Advisory Bodies might be consulted by the States Parties to provide advice, in terms of methodology and analysis for the development or revision of Tentative Lists, thereby reducing the risk of spending resources to prepare nominations that may be unlikely to succeed.

As follow up to this publication, the World Heritage Centre and the Advisory Bodies identified the need to further elaborate the operationalisation of the modules presented in this guidance, in particular Module 2 on "the process of developing or revising a Tentative List". ICOMOS has developed this module in cooperation with IUCN and the World Heritage Centre.

9. Rights-based approach

Important changes to the *Operational Guidelines for the Implementation of the World Heritage Convent* were adopted in 2021 to introduce a reform to the nomination process to become a two-stage process. Within this reform, local communities and Indigenous peoples' involvement has been acknowledged through the Preliminary Assessment request (Annex 3 of the *Operational Guidelines*) and the revised nomination dossier format (Annex 5 of the *Operational Guidelines*).

States Parties are now asked formally to submit information on whether and how local communities and Indigenous peoples have been consulted during the nomination process and are involved in the management of the nominated property.

With a view to preparing such assessments and to fine-tune the methodology, the ICOMOS Evaluation Unit and the OCD-RBA Working Group have conducted a pilot study to analyse the potential of desk review screening to identify heritage and rights issues in World Heritage nomination dossiers. This work has been renewed for the current cycle of nominations.

ICOMOS procedure

The ICOMOS procedure is described in Annex 6 of the Operational Guidelines for the Implementation of the World Heritage Convention (2024). It is regulated by the Policy for the implementation of the ICOMOS World Heritage mandate. This document is available on the ICOMOS website: www.international.icomos.org.

This policy makes public the existing procedure, and sets out the fair, transparent and credible approach ICOMOS adopts in fulfilling its World Heritage obligations, and the way it avoids conflicts of interest.

The evaluation of nominations, which involves more than forty international experts for each nomination dossier, is coordinated by the *World Heritage Evaluation Unit* of the International Secretariat of ICOMOS, in collaboration with the Chairs of the ICOMOS World Heritage Panel.

The ICOMOS World Heritage Panel, which brings together some thirty persons, is made up of members of the ICOMOS Board, representatives of ICOMOS International Scientific Committees as well as of some other organisations than ICOMOS and other individual experts. The Panel members are selected each year depending on the nature of the properties nominated (e.g., rock art, 20th century heritage, industrial heritage, interpretation, etc.) and on the basis of geocultural balanced representation. TICCIH and DoCoMoMo are also invited to participate in discussions in which their expertise is relevant. Some cooperation with ICOM has been developed for the sites of memory associated with recent conflicts. In principle all members of the Panel participate by drawing on their own financial resources (pro bono work). The composition of the Panel and the Terms of Reference are available on the ICOMOS website. They represent the various professional, geographic and cultural sensibilities present at the international level. The ICOMOS Panel makes recommendations for each nomination on a collegial basis.

For each nominated property, ICOMOS assesses whether:

- The Outstanding Universal Value is demonstrated,
- It meets the cultural criteria as defined in paragraph 77 of the Operational Guidelines for the Implementation of the World Heritage Convention
- The conditions of integrity and authenticity are met
- Protection and management requirements are adequate.

All nominated properties are given equal attention, and ICOMOS is committed to remaining the most objective, scientific and rigorous possible.

In order to reinforce the consistency of the evaluations and recommendations, and to determine what additional information should be requested from the States Parties, ICOMOS uses a check tool, which is included in this volume.

1. Preparatory work

The preparatory work is done in several stages:

- a. Initial study of dossiers. This first stage of the work consists of establishing an inventory of the documents included in the nomination dossier. They are then studied in order to identify potential gaps or issues concerning the nominated property and to proceed with the selection of relevant experts who will be called on to review the nomination dossier (i.e., ICOMOS advisers, experts for the technical evaluation missions, experts for desk reviews). A compilation of all relevant comparative materials (e.g., Tentative Lists, properties already on the World Heritage List, nomination dossiers, ICOMOS study "The World Heritage List: Filling the gaps an action plan for the future", etc.) is prepared in order to assist the work of the advisers on the specific item of the comparative analysis.
- b. Consultations. International experts are invited to comment, through desk reviews, on the comparative analysis and the potential Outstanding Universal Value of the nominated properties in accordance with the ten criteria set out in the Operational Guidelines for the Implementation of the World Heritage Convention (paragraph 77). ICOMOS also consults experts on issues related to legal protection, cultural tourism, rights-based approaches, and risk preparedness in order to provide recommendations in these areas for all the nomination dossiers, in a systematic manner.

For this purpose, ICOMOS calls on the following:

- ICOMOS International Scientific Committees:
- Individual ICOMOS members with relevant expertise, identified after consultation with International and National Committees;
- Non-ICOMOS members with specific expertise, identified mostly amongst universities and research institutes or partner organisations.

For the nominations to be considered by the World Heritage Committee at its 47th session, around 260 experts provided desk reviews. Around 25% of the

reports received has been drafted by non-ICOMOS members.

c. Technical evaluation missions. As a rule, ICOMOS calls on an expert from the region in which the nominated property is located. In certain exceptional circumstances, most notably in cases where the nature of the nominated property is very specific, the expert may not come from the region concerned. The objective of the technical evaluation missions is to study the authenticity, integrity, factors affecting the nominated property, its protection, conservation and management (Operational Guidelines for the Implementation of the World Heritage Convention, paragraph 78).

The expert is provided with the nomination dossier, a note with key questions based on the initial study of the dossier, documentation on the World Heritage Convention and detailed guidelines on technical evaluation missions.

All experts have a duty of confidentiality. Their opinion on the nomination does not necessarily reflect that of the Organisation; it is the ICOMOS World Heritage Panel which, after examination of all the information, determines the position of ICOMOS.

A technical evaluation mission is sent to each of the nominated properties except in the case of referred back nominations, for which the *Operational Guidelines for the Implementation of the World Heritage Convention* do not state that a new technical evaluation mission is necessary. Furthermore, the deadlines set out in the *Operational Guidelines for the Implementation of the World Heritage Convention* do not allow for the organisation of technical evaluation missions, desk reviews or consideration by the full ICOMOS World Heritage Panel for referred back properties.

Note: Properties are recommended for a referral because additional information is necessary, and not because thorough or substantial modifications are needed.

During the 2025 Cycle, 24 experts representing 21 countries took part in field missions as part of the evaluation of the 24 nominated properties, which in turn represented 24 countries.

ICOMOS and IUCN have exchanged desk reviews and information about draft recommendations for nominations of mixed properties and cultural landscapes before and after the meeting of their respective Panel. Observers from both organisations attended the discussions on mixed properties of the respective Panel.

In addition, during the 2025 Cycle, ICOMOS received comments from IUCN concerning 10 cultural landscape nominations. These comments have been taken into account by ICOMOS in its recommendations.

2. Evaluations and recommendations

- a. ICOMOS World Heritage Panel. Draft evaluation texts (in English or French) were prepared on the basis of the information contained in the nomination dossiers, mission reports, consultations and research. They were examined by the ICOMOS World Heritage Panel at a meeting in Paris from 21 to 29 November 2024. The Panel adopted draft recommendations and identified additional information to be requested from the States Parties. Individual meetings were held with each nominating State Party and the Panel members.
- b. Interim reports. As prescribed by the Operational Guidelines for the Implementation of the World Heritage Convention (Annex 6), the Advisory Bodies have been requested to submit a short interim report for each nomination by 31 January 2025. These reports provide the States Parties with a synthesis of the issues addressed in the examination of their nomination dossiers at this stage of the evaluation procedure and, in some cases, include requests for additional information. All documents received by 28 February 2025 were examined by the ICOMOS World Heritage Panel at its second meeting from 10 to 12 March 2025.
- c. Finalisation of the evaluation volume and its presentation to the World Heritage Committee. Following the second Panel meeting, revised evaluation texts were prepared in the two working languages, printed and dispatched to the UNESCO World Heritage Centre for distribution to members of the World Heritage Committee for its 47th session.

The nominated properties and ICOMOS recommendations will be presented to the World Heritage Committee by ICOMOS advisers in PowerPoint form.

As an Advisory Body, ICOMOS makes its recommendations based on an objective, rigorous and scientific analysis. However, decisions are the responsibility of the World Heritage Committee which relies on its members and their knowledge of the nominations and the evaluation texts published by the Advisory Bodies.

3. Referred back nominations and requests for minor modifications to the boundaries

By 1st February of each year, prior to the World Heritage Committee session, ICOMOS also receives additional information on nominations referred back during previous sessions of the World Heritage Committee.

ICOMOS also examines requests for minor modifications to the boundaries or the creation of buffer zones, as well as for changes of criteria or name of some properties already inscribed on the World Heritage List. Sixteen requests of this type were submitted by the States Parties by 1st February of this year.

4. Dialogue with States Parties

Decision 38 COM 13.8 of the World Heritage Committee requests the Advisory Bodies to consult and ensure dialogue with nominating States Parties throughout the evaluation process of their nominations. ICOMOS is therefore committed to maintaining dialogue with the States Parties throughout its evaluation procedure.

ICOMOS consults and ensure dialogue with the States Parties at different stages of its evaluation procedure. More precisely, the States Parties are in contact with ICOMOS when technical evaluation missions are organised and held. Following the initial study of the nomination dossiers, requests for additional information may be sent to the States Parties before the first meeting of the ICOMOS World Heritage Panel in November. Such requests were formulated for all the nominations received for the 2025 Cycle. The States Parties are also invited to meet the members of the ICOMOS World Heritage Panel at its first meeting in November. Finally, interim reports are submitted to the States Parties after the November Panel meeting.

In most cases, the dialogues with States Parties were fruitful in clarifying issues and elucidating facts.

However, the main point highlighted by these direct dialogues is that ICOMOS and the States Parties still have too limited time to work together to address potential issues, even though the States Parties are receiving advice from ICOMOS earlier than in the past. This is especially true under the current evaluation timetable established to review the nomination dossiers, and even more so for the nominations that require more extensive reworking. This is true for all cases even if the States Parties express their willingness to do so. This is further exacerbated by the fact that this is an ad hoc process and not a regularly anticipated step in the review.

In conclusion, ICOMOS encourages the States Parties to submit Preliminary Assessment requests which could be useful for resolving issues prior to the submission of nominations.

5. Conclusion

All the evaluated cultural properties are remarkable and deserve protection and conservation. ICOMOS makes its recommendations to the World Heritage Committee on the basis of the *Operational Guidelines* for the Implementation of the World Heritage Convention and the directives of the World Heritage Committee.

The opinion of ICOMOS is both independent and institutional. The opinion of one of its members is not binding on the Organisation, and the evaluation texts are the result of the work of more than forty persons for each nomination, with several stages of in-depth peer review. ICOMOS represents cultural heritage experts in all five global regions and is working to protect the entire cultural heritage of the world.

ICOMOS takes a professional and rigorous view of all the dossiers it receives and reviews. Protection, conservation and management are essential for the transmission of all heritage properties to future generations and ICOMOS remains committed to making recommendations for all nominated properties.

Paris, May 2025.

ICOMOS

Check Tool for Recommendations

The grid does not give all possible combinations, but only the lowest benchmarks below which a nomination moves to another category

This tool is to be used jointly with the table summarizing the ICOMOS recommendations

Comparative analysis	Integrity	Authenticity	Criteria	Selection justified (series)	Boundaries	Protection property	Protection buffer zone	Conservation	Management	Threats addressed	Mission required	Conclusion
V	1		√		$\sqrt{}$	$\sqrt{}$	√	*	*	≈	No	Inscription
	1	√	√	V	*	X	X	*	*	≈	No	Referral
	1	√	√	√	X	Х	X	Х	Х	Х	Yes	Deferral
0	0	0	0	0							Yes	Deferral
X	X	X	X	X							-	No inscription

$\sqrt{}$	OK - Good
0	Not demonstrated - Not adequate at this stage
≈	Can be improved
X	Not OK - Not adequate

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Viet Nam	C 1732	Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes	169

Nominations by Category

New nominations (22)		
Australia	C 1709	Murujuga Cultural Landscape
Cambodia	C 1748	Cambodian Memorial Sites: From centres of repression to places of peace and reflection
Cameroon	C 1745	Diy-Gid-Biy Cultural Landscape of the Mandara Mountains
China	C 1736	Xixia Imperial Tombs
Democratic People's Repuplic of Korea	C/N 1642	Mount Kumgang – Diamond Mountain from the Sea
France	C 1725	Megaliths of Carnac and of the Shores of Morbihan
Germany	C 1726	The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee – From Dreams to Reality
Greece	C 1733	Minoan Palatial Centres
India	C 1739	Maratha Military Landscapes of India
Iran (Islamic Republic of)	C 1744	Prehistoric Caves and Falak-ol-Aflak Ensemble of Khorramabad Valley (PCFEKV)
Italy	C 1730	Art and Architecture in the Prehistory of Sardinia. The domus de janas
Malaysia	C 1734	Forest Research Institute Malaysia Forest Park Selangor (FRIM FPS)
Mexico	C 1704	The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé)
Nepal	C 1741	Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom
Poland	C 1715	Gdynia. Early Modernist City Centre
Portugal	C 1737	Álvaro Siza's Architecture: A Modern Contextualism Legacy
Republic of Korea	C 1740	Petroglyphs along the Bangucheon Stream
Russian Federation	C 1743	Rock Paintings of Shulgan-Tash Cave
Tajikistan	C 1627	Ancient Khuttal
Türkiye	C 1731	Sardis and the Lydian Tumuli of Bin Tepe
United Arab Emirates	C 1735	Faya Palaeolandscape
Viet Nam	C 1732	Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes
Deferred nominations (2)		
Jamaica	C 1595rev	The Archaeological Landscape of 17th Century Port Royal
Malawi	C 1201rev	Mount Mulanje Cultural Landscape (MMCL)
Referred back nominatio		
Panama	C 1582rev	The Colonial Transisthmian Route of Panamá

Geographical Spread of Nominations

Africa		2 States Parties, 2 nominations
Cameroon	C 1745	Diy-Gid-Biy Cultural Landscape of the Mandara Mountains
Malawi	C 1201rev	Mount Mulanje Cultural Landscape
Arab States		1 State Party, 1 nomination
United Arab Emirates	C 1735	Faya Palaeolandscape
Asia and the Pacific		11 States Parties, 11 nominations
Australia	C 1709	Murujuga Cultural Landscape
Cambodia	C 1748	Cambodian Memorial Sites: From centres of repression to places of peace and reflection
China	C 1736	Xixia Imperial Tombs
Democratic People's Republic of Korea	C/N 1642	Mount Kumgang – Diamond Mountain from the Sea
India	C 1739	Maratha Military Landscapes of India
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Nepal	C 1741	Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom
Republic of Korea	C 1740	Petroglyphs along the Bangucheon Stream
Tajikistan	C 1627	Ancient Khuttal
Viet Nam	C 1732	Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes
Europe and North America		8 States Parties, 8 nominations
France	C 1725	Megaliths of Carnac and of the Shores of Morbihan
Germany	C 1726	The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee – From Dreams to Reality
Greece	C 1733	Minoan Palatial Centres
Italy	C 1730	Art and Architecture in the Prehistory of Sardinia. The domus de janas
Poland	C 1715	Gdynia. Early Modernist City Centre
Portugal	C 1737	Álvaro Siza's Architecture: A Modern Contextualism Legacy
Russian Federation	C 1743	Rock Paintings of Shulgan-Tash Cave
Türkiye	C 1731	Sardis and the Lydian Tumuli of Bin Tepe
Latin America and the Caribbean		3 States Parties, 3 nominations
Jamaica	C 1595rev	The Archaeological Landscape of 17th Century Port Royal
Mexico	C 1704	The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé)
Panama	C 1582rev	The Colonial Transisthmian Route of Panamá

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Technical Evaluation Mission Experts

State Party	ID number	Name of the property	Field mission	Date		
New nominations (22)						
Australia	C 1709	Murujuga Cultural Landscape	Xavier Forde (New Zealand)	Aug./Sept. 2024		
Cambodia	C 1748	Cambodian Memorial Sites: From centres of repression to places of peace and reflection	Johannes Widodo (Singapore)	Sept. 2024		
Cameroon	C 1745	Diy-Gid-Biy Cultural Landscape of the Mandara Mountains	Lassina Simporé (Burkina Faso)	Sept. 2024		
China	C 1736	Xixia Imperial Tombs	Chang Hwan Lee (Republic of Korea)	Aug. 2024		
Democratic People's Republic of Korea	C/N 1642	Mount Kumgang – Diamond Mountain from the Sea	Jun Zheng (China)	Oct. 2024		
France	C 1725	Megaliths of Carnac and of the Shores of Morbihan The Palaces of King Ludwig II of	Stephane Demeter (Belgium)	Oct. 2024		
Germany	C 1726	Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee – From Dreams to Reality	Michael Chambers (UK)	Sept. 2024		
Greece	C 1733	Minoan Palatial Centres	Cees Van Rooijen (Netherlands)	Sept. 2024		
India	C 1739	Maratha Military Landscapes of India	Hwajong Lee (Republic of Korea)	Sept./Oct. 2024		
Iran (Islamic Republic of)	C 1744	Prehistoric Caves and Falak-ol- Aflak Ensemble of Khorramabad Valley (PCFEKV)	Pamir Hatice (Türkiye)	Sept. 2024		
Italy	C 1730	Art and Architecture in the Prehistory of Sardinia. The <i>domus</i> de janas	Simon Gornes (Spain)	Aug. 2024		
Malaysia	C 1734	Forest Research Institute Malaysia Forest Park Selangor (FRIM FPS)	Danai Thaitakoo (Thailand)	Sept. 2024		
Mexico	C 1704	The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé)	Ulises Cardenas Hidalgo (Chile)	Aug. 2024		
Nepal	C 1741	Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom	John Peterson (USA/Philippines)	Oct. 2024		
Poland	C 1715	Gdynia. Early Modernist City Centre	Jörg Haspel (Germany)	Aug. 2024		
Portugal	C 1737	Álvaro Siza's Architecture: A Modern Contextualism Legacy	Marieke Kuipers (Netherlands)	July 2024		
Republic of Korea	C 1740	Petroglyphs along the Bangucheon Stream	Benjamin Smith (Australia)	May 2024		
Russian Federation	C 1743	Rock Paintings of Shulgan-Tash Cave	Fernando Carrera Ramirez (Spain)	July 2024		

Tajikistan	C 1627	Ancient Khuttal	Jean Yasmine (Lebanon)	Sept. 2024		
Türkiye	C 1731	Sardis and the Lydian Tumuli of Bin Tepe	Adrian Olivier (UK)	Sept. 2024		
United Arab Emirates	C 1735	Faya Palaeolandscape	Sanjin Mihelic (Croatia)	Oct. 2024		
Viet Nam	C 1732	Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes	Ratish Nanda (India)	Aug. 2024		
Deferred nomina	Deferred nominations (2)					
Jamaica	C 1595rev	The Archaeological Landscape of 17th Century Port Royal	Maria Barba Meinecke (Mexico)	Aug. 2024		
Malawi	C 1201rev	Mount Mulanje Cultural Landscape (MMCL)	Simon Makuvaza (Zimbabwe)	Aug. 2024		
Referred back nomination (1)						
Panama	C 1582rev	The Colonial Transisthmian Route of Panamá	Maria Claudia Lopez (Colombia)	Aug./Sept. 2023		

III Cultural properties

A Africa

New nomination

Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination Nomination deferred by a previous session of the World Heritage Committee

Diy-Gid-Biy Cultural Landscape of the Mandara Mountains (Cameroon) No 1745

1 Basic information

Official name as proposed by the State Party

Diy-Gid-Biy Cultural Landscape of the Mandara Mountains

Location

Villages of Bigidé, Moutchikar District of Koza

Villages of Kuva, Mondossa, Mudukwa, Nduval and Oupay

District of Mayo-Moskota

Department of Mayo-Tsanaga Far North Region Cameroon

Brief description

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is located in the Far North Region of Cameroon, on the border with the Federal Republic of Nigeria. It is organised around a group of sixteen archaeological remains, or Diy-Gid-Biy (DGBs), spread across seven villages. These dry-stone architectural structures were probably built between the 12th and 17th centuries. Whilst the identity of their builders remains unknown, the site is currently mainly occupied by the Mafa people, who settled in the region between the 15th and 17th centuries. The expression "Diy-Gid-Biy" literally means "Ruin of the Chief's Residence" in the Mafa language. Today, the DGBs are used by the communities as religious sites. On the slopes and at the base of the mountain there are agricultural terraces, residential buildings, tombs, places of worship and many artisan activities.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

23 June 2020 as "Le paysage culturel de Diy Gid Biy des Monts Mandara (extension du Paysage culturel de Sukur)"

Background

A previous nomination was submitted in January 2022 as an extension of the property "Sukur Cultural Landscape" (Nigeria) but was withdrawn before examination by the World Heritage Committee.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 2 to 13 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 24 September 2024 requesting further information about the format of the dossier and the annexes, the boundaries, the description and the factors affecting the nominated property, its integrity and authenticity and its conservation and management.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the description, the documentation and the boundaries.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is located in the Far North region of Cameroon, on the eastern border with the Federal Republic of Nigeria. It includes the villages of Bigidé, Kuva, Mondossa, Moutchikar, Mudukwa, Nduval and Oupay.

It is structured around a group of sixteen archaeological and architectural ruins, referred to as the Diy-Gid-Biy (DGBs) by the local communities. This term literally means "Ruin of the Chief's Residence" in the language of the Mafa, the people who now mainly occupy the site.

The DGBs are believed to have been built in several successive stages between the 12th and 17th centuries. While the oldest walls and structures date from the 12th century, radiocarbon dating indicates that the majority of the sites were built from the 15th century onwards. This period coincides with the expansion of Islam in the plains of Lake Chad and the opening up of the area to Atlantic trade networks, both indicators of profound socio-political, religious and economic changes in the region. The period was also marked by a severe drought across the entire Lake Chad basin in the early 15th century.

The remains share four distinctive features that give them their own identity: their atypical architecture, their mountain location, their designation as a chief's residence, and, as specified in the additional information submitted by the State Party in February 2025, the pottery.

The ruins are dry-stone architectural structures (i.e. without mortar) built with stones of various types (granite, basalt, quartz, etc.) taken from their immediate surroundings. Circular and semi-circular in shape, these architectural structures consist of stairways. passages/corridors, silos, platforms, terraces and doublefaced walls, although not all of these elements are present in each of the structures. Their dimensions allow them to be classified into four categories: very large structures (1,320 to 1,680m²), large structures (600 to 830m²), medium structures (460 to 540m²), and small structures (50 to 400m2). With a surface area of 1,680m2, DGB 01 is the largest structure, whilst DGB 09, at 50m2, is the smallest. The large structures are the most numerous.

The dry-stone walls, today measure between 1 metre and 3.40 metres high and up to 22 metres long. Construction techniques for four types of walls can be seen: buttresses, terraces, retaining walls and free-standing walls. The stones are set more or less precisely interlocked, depending on the case.

The most elaborate architecture can be seen in DGB 01 and 02, which are 100 metres apart.

These architectural structures are also associated with altars (or *mbuloms*) and tombs.

Archaeological excavations have revealed a complex sequence spanning several centuries, made up of successive phases, with indications of both domestic occupation and ritual function. The former is evidenced by the discovery in DGB 01, 02 and 08 of discarded household waste and remains that can be interpreted as kitchen hearths for meat preparation, particularly in the context of ceremonies. The altar in the central courtyard, altar chambers, deposits of metal objects, pottery representing divinities, and the kitchen hearths and the domestic debris associated with feasts and/or sacrificial rites found in the central courtyard of DGB 01, point to a ritual function. The archaeological excavations have found evidence of ritual and spiritual activities associated with water and fertility. The natural environment of the sites and the setting for their construction also suggest security concerns and defensive strategies.

According to the additional information from February 2025, the DGBs are also associated with agricultural terraces, consisting of dry-stone walls ranging from 40 to 50cm to as much as 150cm in height, and 30 to 150cm wide. Their strategic location provides access to the DGB, whilst also providing a natural barrier that protects the cultural landscape.

Neither written nor oral sources have so far revealed the identity of the original builders of the DGBs. However, the region is now mainly occupied by the Mafa people, whose ancestors are said to have settled in this area between the 15th and 17th centuries. The DGB ruins are actively used by the Mafa, who regard them as sanctuaries inhabited by the spirits of their ancestors and use them as sacrificial and ritual sites. Sacrifices of sheep, goats, chickens and offerings of tobacco and local beer are made at the beginning and end of the rainy season and on other important occasions (official visits, weddings, births and deaths). They may be community, family or lineage-related. There are also tombs, associated with a specific ceremony that testifies to the attachment of the communities to ancestor worship, which are shaped according to the status of the deceased. The tombs reserved for dignitaries consist of a cylindrical well, closed with a large stone slab and topped by a low tumulus delimited by a stone wall. They are four-sided in shape. "Ordinary" people's tombs are marked with a simple stone slab, or a cylindrical tumulus for men who have been able to sacrifice a bull during their lives.

As well as these ritual practices, the Diy-Gid-Biy Cultural Landscape is also characterised by a number of features and practices associated with the intangible heritage. For example, traditional medicine using endemic plants, the practice of which is reserved for Mafa blacksmiths, who work as medicine men and practice the art of divination using stones; the rites practised in the villages

surrounding the sites, in particular for burying the dead, fertility, rain, the harvest and warding off bad luck; and events to celebrate the Msla and Goalala (harvest festival) and Maray (bull festival).

There is no direct historical link between the DGB remains and the buffer zone, which constitutes a living heritage associated with the populations settled in the surroundings of the nominated property. The buffer zone is characterised by an environment of agricultural terraces built on the slopes of the mountain range, with burials, sacrificial sites and other cult places on the lower reaches. The farming practised is primarily cereal-based, producing millet and sorghum for domestic consumption, as well as cotton, peanuts, sesame, beans and cowpeas for sale. The agricultural terraces are cleverly designed, consisting of 30cm-wide benches and low walls, ranging from 30cm to 1m in height, depending on the slope and the composition of the materials.

The buffer zone also contains dwellings, the architecture of which differs from that of the archaeological remains. They consist of circular huts with conical thatched roofs and mud and/or stone walls, granaries and enclosures. More recent rectangular buildings with sheet metal roofs can also be seen.

The nominated property has an area of 2,500 ha, and is surrounded by a buffer zone 1km wide on average, covering 2,372.3 ha.

State of conservation

The nominated property is in a generally vulnerable state of conservation due to structural degradation caused by natural factors, such as erosion and overgrowth of vegetation, and human-related factors, such as agricultural activities in the immediate vicinity, the re-use of loose stone blocks to build new structures and the lack of adequate conservation/restoration measures.

The nomination dossier mentions the completion, in November 2002, of a condition survey of the DGBs as part of the "Africa 2009" programme. This work was carried out during an initial campaign of archaeological excavations. Subsequently, an inventory was drawn up and the walls of DGB 01 were documented (they were numbered and their state of conservation was recorded).

In its letter of September 2024 requesting additional information, ICOMOS enquired about the possibility of the State Party sharing the study on the conservation conditions. The document was provided as an annex to the additional information submitted by the State Party in February 2025. It is accompanied by a documentation report on the walls of DGB 01, carried out in 2004, and a study funded by CRAterre in 2005, which includes a comparative analysis of the stability of the walls with the aid of photographs.

More specifically, the appearance and state of conservation vary from one DGB structure to another. Some of the walls, such as the north-east wall of DGB 01,

are progressively collapsing, with stone blocks coming loose in some places. DGBs 01 to 04 appear to be the best preserved, although some parts have been disturbed by vegetation and agricultural work. The architectural style of DGB 05 has been quite disturbed. The additional information provided by the State Party in February 2025 provides an inventory that includes a description of each structure.

ICOMOS notes that trees and shrubs have grown on the walls and platforms of some of the ruins and that their roots are generally disrupting the arrangement of the stones and monuments. They might therefore cause the (total or partial) collapse, uprooting or distortion of these structures. It also appears that the removal of stones for various purposes in the past by populations living near the sites has contributed to the degradation of some DGBs.

Despite the degradation and a certain level of vulnerability, the nominated property is regularly maintained by the communities, who carry out cleaning tasks for the ritual functions associated with the DGBs (before ceremonies are held, or when large numbers of visitors and dignitaries are expected). Furthermore, whilst it may represent a threat to the conservation of the DGBs when carried out very close to the walls or platforms of the archaeological ruins, farming also constitutes a means of maintaining the DGBs by protecting them from invasion by tall grass, where game animals take refuge, and by preventing the growth of trees.

Furthermore, with regard to natural heritage, the International Union for Conservation of Nature (IUCN) notes that the Mandara Mountains region may be home to a number of rare endemic plants, and potentially several threatened bird species, including the tawny eagle (Aquila rapax) and the black-crowned crane (Balearica pavonina), which are vulnerable.

In this regard, IUCN has suggested that research be carried out on the presence and distribution of natural species within the property, particularly for vulnerable endemic species. IUCN also recommends that the livestock management associated with the nominated property remains sustainable, with negligible impact on wildlife.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is vulnerable.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are anthropogenic activities related to agriculture, stone extraction, damaging and unregulated visitation at the ruins, and the introduction of "modern" materials; natural factors, such as drought, invasive vegetation and erosion; and the threat of terrorism.

The Diy-Gid-Biy Cultural Landscape faces a number of challenges that may harm its conservation.

As well as the agricultural terraces built into the mountain slopes, some platforms and terraces of the ruins are now used as agricultural terraces, although these practices are becoming rarer. These crops may disrupt the buildings and the landscape, but they also help to protect the Diy-Gid-Biy from being encroached upon by invasive plants and trees that jeopardise their structure.

In its September 2024 letter requesting additional information, ICOMOS asked the State Party to provide further details on the current extent of the agricultural practices and their impact on the DGB archaeological ruins, and reiterated the importance of documenting this. The 2002 conservation conditions study provided with the February 2025 additional information, however, confirms the very high density of agricultural terraces within the cultural landscape. While these terraces are seen as a remarkable testament to the human struggle to transform an extreme environment into a sustainable habitat, the document also specifies that human interventions, through the agricultural terraces and crop-growing, add to the weight of the threats to the conservation of the structures. ICOMOS recommends that the State Party establish guidelines to ensure that farming activities continue without threatening the archaeological remains.

"Modern" buildings are increasingly being added to the traditional Mafa dwellings. These stand out from the rest of the architectural landscape due to their rectangular shape and sheet metal roofs, and this visual impact undermines the integrity of the nominated property.

ICOMOS considers it essential to develop detailed conservation measures in order to limit the deterioration of the walls and avoid the use of unsuitable and non-traditional materials.

Added to these factors are deforestation, the exploitation and use of the stones (often seen as a source of raw materials), environmental degradation, climate change, urbanisation and the rural exodus.

In September 2024, ICOMOS requested additional information on measures to mitigate the natural risks. The State Party indicated that it had signed agreements in collaboration with national and international institutions (including the University of Maroua) to conduct geotechnical studies and implement climate change adaptation measures. Initiatives such as reforestation, green space development and erosion management are under way, with the participation of the Far North Regional Council of Cameroon and the future recruitment of an environmentalist to oversee these efforts.

Lastly, the terrorist group Boko Haram, based in neighbouring Nigeria, has created a climate of insecurity in Cameroon, threatening the human rights of its populations. Terrorist incursions have resulted in robbery, forced displacement and material damage, for example in 2020 in the village of Mondossa, where houses were burned down and schools and health centres vandalised. Although the archaeological ruins have not yet been directly affected, the threat could result in the desecration or destruction of the remains if it intensifies.

ICOMOS considers that the state of conservation of the property is vulnerable, particularly with regard to the DGB structures, and that the factors affecting the property are: human activities (farming near the site, stone quarrying, damaging and unregulated visitation at the ruins, and the introduction of "modern" materials); natural factors (drought, invasive vegetation and erosion); and the threat of terrorism. While agricultural practices are an integral part of the cultural landscape, they should be carried out in such a way as to ensure that they do not harm the DGB structures. It is also essential that measures be put in place to control and limit the deterioration of the walls and the use of modern materials. The studies and initiatives in progress relating to natural risk mitigation should be continued, and a risk management plan should be established to address all risks through detailed monitoring. ICOMOS recommends the development of guidelines to ensure that agricultural and livestock activities are compatible with the preservation of the archaeological sites and the endangered species.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Diy-Gid-Biy Cultural Landscape stands out due to the ingenuity of the architecture of the DGB ruins, which is characterised by the use of dry stones with no mortar, forming a unique masterpiece.
- It is also an exceptional example of spiritual and political resilience in the face of the climatic adversity and political insecurity that have plagued the region since the 12th century, exemplifying a form of occupation characteristic of a critical stage of human settlement in a troubled and hostile environmental and political context.
- The associated resilience mechanisms are supported by strategies and endogenous knowledge that synergise nature, traditional technical knowledge and spirituality. These may constitute an efficient resource for the current communities, which are facing new types of major climatic, socio-political, religious, economic and security challenges.

Based on the nomination dossier and additional information, and according to the State Party, the main attributes of the proposed Outstanding Universal Value are the ingenuity of the DGB dry-stone ruins associated with the agricultural terraces, which constitute a relict cultural landscape. However, ICOMOS believes that,

whilst resilience is an important factor in the continuation of the property, it cannot be considered a dimension of the property manifested in a sufficiently unique or exceptional way to be considered part of the Outstanding Universal Value. Resilience is a trait shared by traditional human communities throughout Africa and other regions of the world, and it is difficult to see the nominated property as a globally significant tangible expression of it.

Comparative analysis

The comparative analysis has been developed according to the following parameters: sites that bear witness to lost civilisations whose creators built dry-stone architecture; and evidence of ongoing resilience through contemporary religious and artisanal practices. It has examined properties within Cameroon and Nigeria in particular, and from Africa, Asia, America and Europe in general, inscribed on the World Heritage List, as well as other properties.

The nominated property shares similarities with the Sukur Cultural Landscape (Nigeria, 1999, criteria (iii), (v) and (vi)), notably due to its dry-stone structures and agricultural terraces, but differs due to its architectural antiquity and its living spiritual and emotional connections with the Mafa populations. Other similar archaeological sites, such as the palaces of the nobility of Mofu-Diamaré and Gre-a-Tlala-Mafa in Cameroon, have comparable structures but distinctive facades. Although sites such as the Khami Ruins (Zimbabwe, 1986, criteria (iii) and (iv)). the Great Zimbabwe National Monument (Zimbabwe. 1986, criteria (i), (iii) and (vi)) and the Konso Cultural Landscape (Ethiopia, 2011, criteria (iii) and (v)) have similar characteristics in terms of their tall structures and socio-political functions, according to the State Party the DGBs are distinguished by their ongoing use for spiritual purposes, while the Konso site is unique due to its anthropomorphic wooden statues.

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is also compared to several sites around the world, including the Rice Terraces of the Philippine Cordilleras (Philippines, 1995, criteria (iii), (iv) and (v)) and the Champaner-Pavagadh Archaeological Park (India, 2004, criteria (iii), (iv), (v) and (vi)), which have agricultural terraces and similar hydro-agricultural arrangements. In America, it is compared to the Archaeological Site of Chavin (Peru, 1985, criterion (iii)) and the Sacred City of Caral-Supe (Peru, criteria (ii), (iii) and (iv)), which are distinguished by their complex engineering and spiritual values in difficult environments. In Europe, the DGBs are compared to the Kernavé Archaeological Site (Lithuania, 2004, criteria (iii) and (iv)), which provides evidence of the interactions between ancient civilisations and their environment.

Other sites could have been added to the analysis, including the "Tazota" dry-stone constructions in the Doukkala region of Morocco.

ICOMOS considers that the comparison of the DGB ruins with regions in Asia, the Americas and Europe is not

relevant, but that their comparison with other African sites demonstrates that the DGB sites warrant consideration for inscription on the World Heritage List. They constitute the most impressive series of dry-stone structures in sub-Saharan Africa, with the exception of the Horn of Africa and the ruins of Zimbabwe and Mozambique.

Furthermore, the examples chosen do not take into account the evidence of ongoing resilience and the associated contemporary strategies, practices and endogenous knowledge. Therefore, it is not possible to prove that the subsistence strategies and practices of the people who shaped this landscape express resilience and that the tangible results of these practices can be considered an exceptional illustration of this resilience.

ICOMOS considers that the comparative analysis, despite some gaps, justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii) and (iv).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the Diy-Gid-Biy Cultural Landscape of the Mandara Mountains provides a unique testimony to cultural and technical knowledge and know-how, combining monumental dry-stone architecture and a socio-political and religious organisation adapted to the challenges of a difficult mountain environment, climate change in the Sudano-Sahel area, and regional insecurity. This landscape was shaped over a period of more than five centuries (from the 12th to the 17th centuries) by a people that have disappeared or have been integrated into the post-15th century populations of the Mandara Mountains and surrounding regions (notably the plains of Lake Chad).

ICOMOS considers that the DGB structures and the agricultural terraces bear witness to the rich cultural tradition of their creators. However, ICOMOS notes that there is a gap between the populations who created these structures and the current Mafa populations, which scientific research has not yet been able to bridge. Although there appears to be a certain continuity between these two populations in their way of occupying the space (particularly through the agricultural terraces), there is no proven information to enable understanding of the initial configuration of the site and the co-evolution of the initial landscape and the current landscape.

ICOMOS considers that this criterion is demonstrated, but that further scientific research is needed to obtain more information on the populations who created the DGB structures and their initial configuration.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that the Diy-Gid-Biy Cultural Landscape of the Mandara Mountains illustrates and perpetuates, through its monumental dry-stone architecture, a unique form of occupation of the mountainous environment in the Sudano-Sahel area, marking a critical stage of human settlement in this semi-arid environment. The DGBs represent a unique and exceptional example of architectural ingenuity resulting from a technical tradition of dry-stone masonry constructed without mortar.

The State Party also highlights the fact that this architecture demonstrates a form of spiritual and political resilience in the face of the climatic adversity and political instability that has plagued the region for nearly ten centuries, and which continues today through the ritual practices of the Mafa. However, ICOMOS considers that the significant period of human history that the property illustrates has not been defined, and that the resilience aspect cannot be demonstrated to date, given the lack of existing information on the conditions inherent in the establishment and evolution of the DGB structures.

Furthermore, the comparative analysis did not demonstrate how the aspects related to the evidence of continuity of resilience, and the contemporary strategies, practices, and endogenous knowledge associated with the nominated property, were exceptional.

ICOMOS considers that this criterion is not demonstrated.

ICOMOS considers that the main attributes are the platforms, terraces, and complex dry-stone structures of the DGB ruins, integrated into a terraced landscape that can provide further information on the civilisation that built them. It is important for research to continue, in order to understand the conditions and context in which this landscape was created and evolved to its present condition, enabling understanding of the significance of the period concerned, as well as the history and characteristics of the people who created it.

ICOMOS considers that the nominated property meets criterion (iii), but that criterion (iv) has not been demonstrated.

Integrity and authenticity

Integrity

Due to their characteristic dry-stone architecture and associated cultural and worship practices, the sixteen DGB archaeological structures that make up the Diy-Gid-Biy Cultural Landscape are fully integrated into the local environment of the Mandara Mountains.

ICOMOS notes, however, that the integrity of the property faces challenges in a context marked by the expansion of political insecurity and extremist religious movements, as well as the increasing effects of climate change and environmental degradation.

It is also possible that stones have been removed from the DGB structures by populations over time for various purposes. In addition, some of these structures are used for agricultural purposes, these practices being carried out either near the walls or directly on the platforms of the structures, threatening their integrity. ICOMOS believes that all agricultural practices in the vicinity of the DGB structures should be strictly controlled. The current inhabitants should be involved, to ensure that important elements of these structures, which could shed light on their origins, their functions and ultimately the civilisation that built them, are not lost.

Conversely, invasive plants or tree roots may play a part in the distortion or destruction of these structures. A balance should therefore be found between agricultural practices that would not directly affect the ruins, but would prevent the risk posed by vegetation growth.

The 2002 study on the conservation of the DGB ruins reported the degradation of certain elements of the property, in particular the progressive collapse and detachment of stone blocks at different levels of the walls.

ICOMOS also notes the presence of several plots (family farms) within the nominated area. These are mostly built of stone using mortar, or of cob. In its interim report, ICOMOS asked the State Party to provide further details about these plots. In its response, the State Party clarified that these farms correspond both to the ruins of dwellings abandoned by the Mafa, but to which they show a particular attachment, and to the farms of the traditional guardians in charge of protecting the sites. They are built using local materials. There are 318 farms distributed among the DGB structures.

ICOMOS considers that the integrity of the nominated property has been demonstrated but remains vulnerable.

Authenticity

ICOMOS considers that the DGB sites preserve a high level of authenticity in terms of built structures and the potential for information that they can provide through further scientific research into their origins, construction methods and processes, past functions and, ultimately, the civilisation of their builders. The site's position at high

altitude, which makes it difficult to access, and its incorporation into the beliefs and spirituality of the local communities, have contributed to its preservation.

The strong spiritual connections of the communities that currently inhabit the area are an important factor that underpins community identity and resilience and may also help to preserve these structures.

All the structures have preserved their dry-stone architecture (mostly in granite) without mortar. DGB sites 02 and 08 have been excavated, but these archaeological excavations have not altered the structure of the sites.

Furthermore, although the origin of these ruins is unknown and pre-dates the Mafa communities that arrived in the region between the 15th and 17th centuries, they are today fully incorporated into the cultural and worship practices that punctuate the daily lives of the Mafa populations. The Mafa use them to ensure the quality and success of sowing and harvesting and to ward off disease, death, drought or famine. The Mafa have therefore helped to preserve the authenticity of the nominated property over the centuries, in an adverse, semi-arid mountainous environment.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met.

Boundaries

The nominated property covers an area of 2,500 ha and is surrounded by a 1km-wide buffer zone covering 2,372.3 ha.

The proposed area of the property has been increased compared with the initial proposal submitted in 2022 (which was 717.31 ha at the time), while the proposed buffer zone (3,247.73 ha previously) has been reduced.

In its request for additional information of September 2024, ICOMOS asked the State Party to provide further explanations of the reasoning behind the delineation of the proposed boundaries, including any changes compared with the initial proposal. The State Party explained in its response that the proposed area of the property was increased with a view to ensuring its integrity by including all elements essential to its Outstanding Universal Value and to providing protection and management of the property that would ensure its conservation and transmission to future generations.

It also reported that a comprehensive assessment of heritage sites associated with neighbouring communities had been carried out, in order to identify those with a direct and significant relationship with the property. In February 2025, the State Party clarified that the attributes included within the current boundaries of the property that were not included in the proposed boundaries in 2022 are

some terraces and two altars. The State Party also provided a detailed summary of the heritage sites associated with the surrounding communities inhabiting the buffer zone. These sites include enclosures, traditional wells, site guardians' plots, cemeteries, as well as blacksmith and pottery workshops, distributed among the DGB structures.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the nominated property constitutes a relict cultural landscape consisting of a group of dry-stone DGB archaeological structures associated with agricultural terraces. Despite the lack of information currently available on the context, period of establishment and evolution of this landscape, as well as the populations who created it, the attributes of the archaeological remains and terraces bear witness to the cultural tradition of a vanished civilisation and continue to be preserved thanks to the current Mafa populations. The comparative analysis, despite some gaps, justifies consideration of the property for inscription on the World Heritage List. ICOMOS considers that criterion (iii) is justified, but not criterion (iv). The conditions of integrity and authenticity are met, but integrity remains vulnerable, given the state of deterioration of the DGB structures.

4 Conservation measures and monitoring

Documentation

The nomination dossier contains a summary of the archaeological finds from the excavations in 2001 and 2002 collected from ten DGB sites. Thanks to these excavations, 25,821 artefacts were collected, consisting of lithic, ceramic and metal objects as well as bones, which are now stored in four storage chests.

The documentation relating to the Diy-Gid-Biy Cultural Landscape is mainly available at the Directorate of Cultural Heritage of the Ministry of Arts and Culture and at the National Archives of Cameroon, both located in Yaoundé, as well as at the Documentation Centre of the University of Maroua and the local archaeological site of Gouzda. The dossier also provides a relatively substantial bibliography of works relating to the site.

The dossier also mentions the existence of a study of the conservation conditions of the DGB ruins that was carried out in 2002, during the first archaeological excavation campaign funded by the "Africa 2009" programme and the documentation of the DGB 01 walls carried out in 2004, as well as a 2005 study that includes a comparative analysis of the stability of the walls with the aid of photographs. These documents have been submitted by the State Party, along with a brief inventory of each of the DGB structures, in response to the ICOMOS interim report, in February 2025.

ICOMOS considers that additional investment is needed to carry out research on the dry-stone DGB structures, in

order to clarify their origins, the reasons for their construction, their functions and any modifications they have undergone, and to shed light on the civilisation that built them.

In response to the ICOMOS interim report when the nomination dossier was first submitted, the State Party advised that a Memorandum of Understanding (MoU) between the Ministry of Arts and Culture (MINAC) and the University of Maroua had been signed on 27 February 2023 concerning research programmes, scientific events, capacity building for the conservation of DGB remains and research and fundraising for the protection of the nominated property. The MoU also provides for the implementation of an action plan.

Conservation measures

Conservation measures are under way, including conservation actions and programmes, as well as maintenance work.

In this regard, it should be noted that a plan has been developed for the streamlining and use of the spaces of the archaeological ruins, as well as a one-off programme of conservation activities, the revitalisation of traditional crafts, safeguarding and valorisation of intangible cultural heritage, and strengthening of security through cross-border cooperation mechanisms.

In September 2024, ICOMOS enquired about the current status of implementation of these various measures to the State Party. The State Party specified in its response that the plan for the streamlining and use of the spaces of the DGB ruins is still under development, but that a one-off programme of activities has been drawn up. This includes actions to stabilise the structures, restore damaged elements and set up weather protection systems.

ICOMOS considers that it is urgent to implement a set of detailed measures to limit the deterioration of the stone walls of the DGB and the terraces on which they are built.

The communities also actively participate in conserving and maintaining the site, in particular by regularly cleaning the altars before ceremonies are held or when visitors or dignitaries are expected.

Monitoring

The monitoring of the Diy-Gid-Biy Cultural Landscape of Mandara Mountains is administered at the national, local and traditional levels.

At the national level, it is carried out by MINAC through the Directorate of Cultural Heritage and the Sub-Directorate of Tangible Cultural Heritage.

At the local level, it is managed through certain administrations with decentralised services and decentralised authorities, which carry out daily monitoring on the ground. These include the Prefect of the Department of Mayo-Tsanaga, the Sub-Prefects of the Districts of Mayo-Moskota and Koza, as well as the

departmental delegates of the Ministry of Decentralisation and Local Development and of MINAC.

Lastly, at the traditional level, monitoring is carried out by the guardians of the sites and the persons in charge of sacrifices, who carry out and coordinate the various ceremonies.

ICOMOS considers that the identification of indicators that link attributes and factors affecting the nominated area, and understanding conservation trends, would provide a better monitoring system. ICOMOS also considers that developing indicators to measure the achievement of objectives would contribute to more effective conservation. In particular, it would be useful to develop active conservation and research.

ICOMOS considers that, although documentation and research, particularly on the DGB ruins, has been previous carried out, this should be continued in order to better understand who built these structures and why they were built. As part of ongoing conservation measures, dialogue with local populations is crucial to establish a shared conservation approach and agreed protocols for the careful use of the sites during rituals, to ensure effective protection and conservation, while respecting and maintaining the communities' links with these sites.

The monitoring system could be further developed, with the establishment of indicators linking the factors affecting the nominated area and its attributes, so that changes in their state of conservation can be assessed. It would also be necessary to develop indicators to assess whether the envisaged conservation objectives have been achieved. It is also essential that complementary monitoring between the national, local and traditional levels be maintained.

Lastly, ICOMOS considers that it would be desirable for the monitoring system to be adapted to facilitate the inclusion of its results in the periodic reporting questionnaire.

5 Protection and management

Legal protection

The Diy-Gid-Biy Cultural Landscape was classified as a national heritage site by Ministerial Order No. 0002/MINAC/SG of 28 February 2019. It is also protected by the Law of 18 April 2013 governing the cultural heritage of Cameroon, which protects listed sites.

Law No. 2013/003 regulates the identification, classification, management and enhancement of cultural property and sets out legal provisions for its protection. Decree 2020/4601/PM determines the methods of application of the provisions of this law, with the creation of the National Consultative Commission for the Management of Cultural Heritage (Commission Nationale Consultative pour la Gestion du Patrimoine Culturel – CNCGPC), which is competent to manage national

cultural assets in a rational and sustainable manner, and a national register of cultural heritage within the Ministry of Arts and Culture (*Ministère des Arts et de la Culture* – MINAC). The decree indicates that the enhancement and promotion of cultural property is the responsibility of the State and decentralised regional units. The responsibility for the conservation and restoration of registered cultural heritage lies with MINAC, in accordance with the advice of the CNCGPC.

In May 2019, a collaboration platform was established by MINAC and the Ministry of Tourism and Leisure (*Ministère du Tourisme et des Loisirs* – MINTOUL) in order to improve and promote cultural tourism.

In terms of traditional protection, the information provided in the nomination dossier focuses on taboos and prohibitions concerning the archaeological ruins, altars and sacrificial sites of the DGBs, but does not address other traditional protection mechanisms.

A number of plans relating to local planning are reported in the nomination dossier. Developed within the framework of the National Participatory Development Programme, these are the National Plan for Planning and Sustainable Development of the Territory of the Far North Region (in the course of approval), the Regional Plan for Planning and Sustainable Development of the Territory of the Far North Region (2019), as well as the Municipal Development Plan for the Municipality of Koza (2011), the Municipal Development Plan for the Municipality of Mayo-Moskota (2011) and the Development Plan for the Mozogo-Gokoro National Park (in the course of approval).

A curator has been appointed for all the DGB sites. He acts as an intermediary between the State and its representatives, on the one hand, and the guides and guardians of the DGBs, on the other.

Management system

The site is conserved and managed by three separate committees: a ministerial committee, a technical committee and a management committee.

A management plan was developed for the period 2022-2026 (as part of the first submission of the dossier in 2022) and subsequently for the period 2024-2028. The aims are to protect and conserve the physical and intangible cultural attributes of the site; to improve its presentation and promotion and the provision of visitor facilities; and to mobilise resources and incorporate the conservation of the site into the sustainable development of the communities.

In its response to the letter requesting additional information of September 2024, the State Party advised that a management committee has been established. The committee is made up of representatives of the relevant ministries, local communities, experts in archaeology and conservation and civil society organisations. It meets regularly to discuss management strategies, resource needs and upcoming projects.

The site is also managed under a traditional system. Each village has appointed a guardian who acts as a *biy* or "sacrificer" during ceremonies. All the inhabitants respect the instructions related to the DGBs. They regularly hold large traditional festivals that serve to preserve cultural values and pass down knowledge to young people. For example, no agricultural activity is allowed on DGB 09 due to its level of sacredness. At DGB 15, only the sacrificial team is allowed to approach the structure. Its stones must not be moved under penalty of bad luck, such as being struck by lightning.

In addition, measures have been taken to overcome the challenges facing the nominated property. These include, in addition to the implementation of the management plan, the establishment of a budget to support activities on the site since 2022; and co-oversight and co-monitoring of libation, fertility and rain rituals on the site, in concert with local communities, to ensure respect for popular spiritual Mafa traditions while guaranteeing the physical integrity and protection of the sites.

While the management plan specifies that the Chiefs of the Koza and Moskota districts should coordinate the activities of the site guardians, in collaboration with the chiefs of the various villages and the traditional curators, ICOMOS notes that it is unclear at what level of the management structure the representatives of the municipal subdivisions are integrated. ICOMOS also observes that the vision and main objectives of the management plan are based on the communities and how to improve their living conditions through a series of strategies and actions. However, the objectives for the documentation and conservation of the attributes are very general, and the actions planned in these areas are very limited. Among other things, the DGB archaeological remains are not assigned precisely described specific targets and actions in the management plan.

The plan also does not include any points relating to risk management

Visitor management

While the site had many visitors in the past, numbers have fallen dramatically due to the security crisis affecting the region.

Visitor management is sometimes carried out on a sporadic basis by certain tour operators in Maroua or by religious authorities, but no tourism policy has really been implemented.

The municipalities of Koza and Mozogo have nevertheless undertaken to give more visibility to the site in their tourism promotion strategy.

ICOMOS shares the State Party's view that efforts should be made to re-stimulate tourism. The process of improving the tourism infrastructure will involve addressing questions to do with the feasibility, level and timing of visitor access to the DGB sites, to which entry is prohibited under taboos when ceremonies are not taking

place, and addressing concerns about the well-being of local people in the face of the development of tourism in the area. Although this may currently be seen as a matter for the distant future, tourism could easily and rapidly become a problem to be solved rather than a solution to current problems, if it is not carefully planned and handled.

Community involvement

The communities are heavily involved in the management and protection of the property, including through traditional site management and regular maintenance of the altars

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that, although legal protection is in place for the nominated property, the presence of State agents to ensure protection is insufficient; consequently, any deterioration of the property is likely to go undetected. Prohibitions arising from traditional protection and taboos forbidding access to the DGB sites outside of rituals have helped to reduce human pressures, although human presence during rituals has been identified as a factor affecting the property. However, this traditional protection may not prove sufficiently effective in the face of increased visitor numbers if tourism is developed. Despite the existence of land-use plans at various levels, there are no urban planning instruments in place to regulate construction, land use, infrastructure development or building types. Currently, the pressures are low, but if they were to increase, no effective tools would regulate them.

The management structure is complex and involves many stakeholders. While participation and representation are very important, ICOMOS considers that this complexity may not be sustainable or effective over time, particularly given the constraints on resources. At the local level, ICOMOS recommends adopting an inter-village management approach, jointly involving the communities concerned and facilitating the harmonisation of planning and management methods for the DGB sites.

ICOMOS considers that a single curator for the entire property is largely insufficient, even to ensure minimal monitoring, given the size of the nominated property and the complexity of the conservation problems at the DGB sites. Specific conservation, research, and management strategies should be urgently developed for the DGB sites, whose conservation is essential to shed light on an ancient and important period of human history in the Mandara Mountains, which remains largely unknown. Involving archaeologists and experts with solid knowledge of the specific characteristics of these sites will be essential to accomplish this task.

Clarification of the management structure as it relates to the role of local governments is also needed; the management staff should be increased and its capacity strengthened, and a budget for conservation should be established. In particular, professionals with archaeological experience should be involved in addressing conservation and management matters at the DGB sites, in dialogue with the traditional custodians of these structures. Making the nominated property accessible to visitors requires the provision of basic infrastructure, which should be carefully implemented to ensure that the property is not affected by inappropriate development. There is an urgent need to understand how visitor access to the DGB sites will be managed. The presentation and interpretation of the dry-stone structures of the DGBs should be carefully designed, respecting the scientific findings and avoiding over-interpretation. It is crucial that their specific characteristics be highlighted, and that the research questions that are still unanswered also be presented to visitors. Lastly, it is important to include a risk management plan alongside the management plan, in order to address the various risks facing the property, whether natural or human.

6 Conclusion

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is organised around a group of sixteen drystone archaeological ruins, or DGBs, associated with agricultural terraces, which are believed to have been constructed between the 12th and 17th centuries by a nowvanished civilisation. The site is currently mainly occupied by the Mafa, who settled in the region between the 15th and 17th centuries and who help to preserve the property by continuing to use the structures as places of worship.

ICOMOS appreciates the commitment of the State Party of Cameroon to nominating this property for inscription on the World Heritage List, following an initial submission in January 2022 as an extension to the "Sukur Cultural Landscape" property (Nigeria), which had been withdrawn before examination by the World Heritage Committee on the basis of ICOMOS' recommendations. The dossier successfully demonstrates the efforts of the State Party and the local community to preserve the nominated property.

ICOMOS considers that the Outstanding Universal Value of the nominated property has been demonstrated, in light of the ingenuity of the DGB structures and terraces: the DGB sites constitute the most impressive series of drystone structures in sub-Saharan Africa, with the exception of the Horn of Africa and the ruins of Zimbabwe and Mozambique. These attributes contribute to the exceptional character of this relict cultural landscape.

Integrity and authenticity have been demonstrated, although the integrity is vulnerable due to the deterioration of the ruins. ICOMOS considers that only criterion (iii) has been demonstrated, as the ruins and terraces bear witness in an exceptional way to the cultural tradition of a vanished civilisation.

It is important that scientific research on the structures, their history, characteristics, and the people who created them be continued, and that measures be taken to limit the deterioration of the walls and the use of modern materials within the landscape. Agricultural practices should also be carried out in a way that prevents damage to the structures.

Lastly, ICOMOS considers that the measures taken for the protection and management of the property should be strengthened through the recruitment of additional staff, the restructuring of management through an inter-village approach, better consideration of archaeological ruins in the management plan and the integration of a risk management plan.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Diy-Gid-Biy Cultural Landscape of the Mandara Mountains, Cameroon, be inscribed, as a cultural landscape, on the World Heritage List on the basis of **criterion (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is located in the Far North Region of Cameroon. It is organised, in the form of terraces, around a group of sixteen archaeological ruins, or Diy-Gid-Biy, spread across seven villages associated with agricultural terraces. These dry-stone architectural structures were probably built between the 12th and 17th centuries. While the identity of their builders remains unknown, the property is currently mainly occupied by the Mafa people, who settled in the region between the 15th and 17th centuries. The expression "Diy-Gid-Biy" literally means "Ruin of the Chief's Residence" in the Mafa language. Today, the Diy-Gid-Biy s are used by the communities as religious sites. On the slopes and at the base of the mountain there are agricultural terraces, residential buildings, tombs, places of worship and many artisan activities.

Criterion (iii): The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains is a unique testament to a now-vanished civilisation, which created a remarkable drystone architecture, organised into terraces, that is very rare in sub-Saharan Africa. Although little is known about this civilisation, it shaped the landscape over a period of more than five centuries (from the 12th to the 17th century). These sixteen Diy-Gid-Biy ruins are characterised by their atypical dry-stone architecture, their location in a remote mountainous region, their designation as chiefs' residences and the pottery they contain, which was originally used for ritual purposes.

The Mafa who now live in the area play a significant role in perpetuating the landscape by continuing to use the structures as sacrificial and ritual sites.

Integrity

The integrity of the property lies in the archaeological structures and terraces, which are fully integrated into the Mandara Mountains area. All the attributes necessary to convey in a substantial manner the Outstanding Universal Value of the property are included within the boundaries of the property. However, the integrity of the property is very vulnerable, due to the degraded condition of the structures, combined with challenges related to political insecurity, the growing effects of climate change and environmental degradation.

Authenticity

The property presents a high degree of authenticity, due to the richness of its built structures. The Diy-Gid-Biy, fully integrated into the cultural and worship practices that shape the daily lives of the Mafa people, are thus being actively preserved. Extensive scientific research should provide insights into the origins, techniques and construction processes of the Diy-Gid-Biy, their previous functions and, ultimately, the civilisation of the people who built them.

Protection and management requirements

The Diy-Gid-Biy Cultural Landscape of the Mandara Mountains has been listed as a National Heritage Site by Ministerial Order No. 0002/MINAC/SG of 28 February 2019. It is also protected under the Law of 18 April 2013 governing the cultural heritage of Cameroon, which protects listed sites. The property is also subject to a set of traditional protections and taboos prohibiting access to the Diy-Gid-Biy ruins outside of rituals.

Careful monitoring and land-use planning instruments are essential complements to legal protection for the long-term protection, conservation and transmission to future generations of the property and its Outstanding Universal Value.

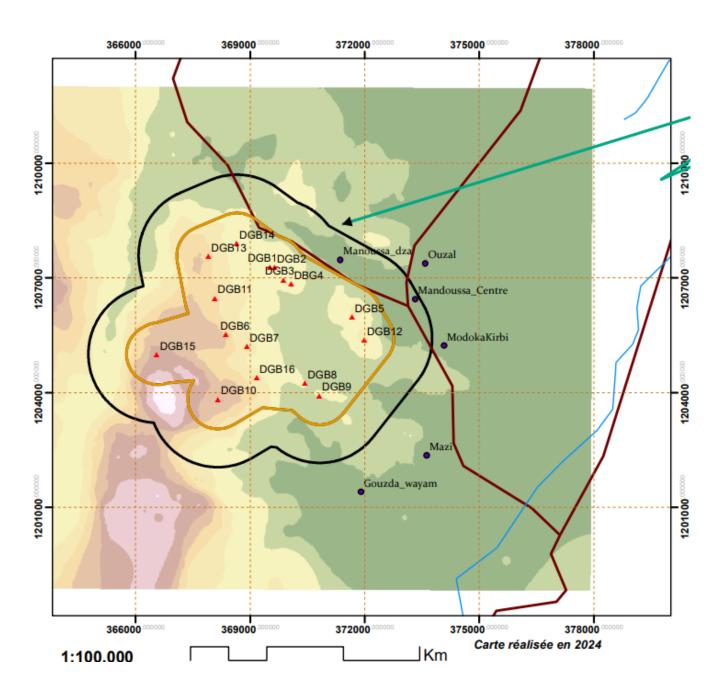
The management of the property, which falls under the responsibility of the Ministry of Arts and Culture (MINAC) in collaboration with local communities and decentralised local units, is carried out by three separate committees: a ministerial committee, a technical committee and a management committee. This system is reinforced at the traditional level by the appointment, in each village, of a guardian who serves as a sacrificer during rituals. A management plan has been developed for the period 2024-2028, and a curator has been appointed to oversee the management of all the Diy-Gid-Biy ruins, acting as an intermediary between the State, the guides and the guardians/sacrificers. However, representatives from municipal subdivisions are lacking in this management system, which would benefit from being restructured on the basis of an inter-village approach. Participatory management is crucial, and management methods should be focused on efficiency and the achievement of long-term goals, with the support of sufficient staff.

Conservation and research strategies are crucial to safeguard the attributes of the property and shed light on the people who built it. Tourist access should be carefully studied and planned, in order to preserve the authenticity of the property. Appropriate risk management should be integrated into management strategies and instruments to address natural and anthropogenic threats.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Continuing scientific research concerning the context of the establishment and evolution of the Diy-Gid-Biy ruins and the populations that created them,
- Implementing measures to conduct agricultural practices in a way that they do not damage the Diy-Gid-Biy ruins,
- Implementing measures to control and limit the deterioration of the walls and the use of modern materials,
- d) Continuing ongoing studies and initiatives on mitigation of natural risks and integrating a risk management plan into the management plan,
- e) Adopting an inter-village management approach by integrating representatives from municipal subdivisions in the management system,
- f) Increasing the management and conservation staff and reinforcing their capacity, and securing a budget for conservation,
- g) Implementing a strategy to manage visitor access to the property and facilitating its presentation and interpretation.



Map showing the boundaries of the nominated property

III Cultural properties

A Africa

New nomination

Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination Nomination deferred by a previous session of the World Heritage Committee

Mount Mulanje Cultural Landscape (Malawi) No 1201rev

1 Basic information

Official name as proposed by the State Party Mount Mulanje Cultural Landscape (MMCL)

Location

Mulanje and Phalombe districts Malawi

Brief description

Mount Mulanie Cultural Landscape (MMCL) encompasses the mountain range located in southern Malawi, with the imposing Mount Mulanje - one of the largest inselbergs in the world - in its centre, and its immediate surroundings. A place believed to be inhabited by gods, spirits, and the ancestors, it carries cultural meanings embedded in or embodied by the geological and hydrological features of its natural environment, and its ecosystems. Said to be imbued with spiritual powers, Mount Mulanje Cultural Landscape (MMCL) has been created and its sacredness sustained by cultural practices and a belief system shared by the Yao, Mang'anja and Lhomwe people.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

17 May 2000 as "Mulanje Mountain Biosphere Reserve"

Background

The World Heritage Committee has examined the nomination of Mount Mulanje Cultural Landscape, Malawi, at its 38th session (Doha, Qatar, 2014) and adopted the following decision 38 COM 8B.18:

The World Heritage Committee,

- 1. Having examined Documents WHC 14/38.COM/8B and WHC-14/38.COM/INF.8B1,
- <u>Defers</u> the examination of the nomination of Mount Mulanje Cultural Landscape, Malawi, to the World Heritage List in order to allow the State Party, with the advice of ICOMOS, IUCN and the World Heritage Centre, if requested, to:

- a) Strengthen the justification of criterion (vi) and explore the applicability of criterion (iii) to illustrate in more detail how spiritual traditions as well as traditional management approaches for cultural and natural resources might be said to be of Outstanding Universal Value and illustrate the tangible attributes these are associated to,
- Identify in relation to the identified attributes of Outstanding Universal Value the information sources of authenticity,
- Augment the comparative analysis, in particular at a regional level, to highlight the specific aspects of cultural guardianship at Mount Mulanje that would demonstrate Outstanding Universal Value;
- 3. Considers that, if such studies suggest that a robust case could be made to justify the Outstanding Universal Value of the site, then the State Party should also:
 - a) Initiate documentation and conservation activities for tangible cultural heritage resources, in particular those subject to regular visitation,
 - b) Analyse and describe the traditional management mechanisms and establish closer ties between the three official management agencies and community elders in view of integrating the traditional and spiritual management practices in the overall property management,
 - Promote a more active role of the Department for Culture in the management of the property, including – if necessary – additional financial resources and training to enable staff to fully commit to this responsibility,
 - d) Explore options of extending the buffer zone towards the east.
 - e) 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;
- 4. <u>Also considers</u> that any revised nomination would need to be considered by an expert mission to the site;
- <u>Recommends</u> that the State Party give consideration to the following:
 - a) Developing a training program and a system of licensing for local guides to ensure consistent quality standards in guiding services,
 - Exploring the qualities of Mount Mulanje with regard to natural heritage criteria as initially envisaged in the tentative list entry.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 12 to 21 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the cultural landscape, tangible expressions of intangible cultural heritage,

integrity, regional status, comparative analysis, protection, land ownership/land uses, threats, and management.

Additional information was received from the State Party on 11 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: maps, buffer zone, threats: mining and tourism, and development projects.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report 12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

Mount Mulanje Cultural Landscape (MMCL) encompasses the mountain range located in the southern part of Malawi, with two distinct mountains – Mulanje to the south and Michesi to the north – and their immediate surroundings. The geology of this vast granite massif, its hydrology and ecosystems define the nominated cultural landscape, which has been created and is sustained by cultural practices and a belief system shared by the local Yao, Mang'anja and Lhomwe people.

Mount Mulanje, among the largest inselbergs in the world, includes many ridges, forested ravines and gullies with streams and water pools, and culminates in numerous peaks, the highest of which, Sapitwa, reaches 3,002 metres above sea level. Mount Michesi, which rises to about 2,300 metres above sea level, is partially separated from Mulanje by a saddle. The mountain range stands above the surrounding Chiradzulu plains, dotted with villages amidst the cultivated land. Its hydrological system includes both perennial and seasonal rivers, which provide water for the local communities and sustain the ecosystems. The area is rich in biodiversity with a high level of endemism. It is located within the broad belt of Miombo woodlands, with the critically endangered Mulanje Cedar (IUCN Red List of Threatened Species) found in the nominated property. It is also part of the Afromontane Regional Centre of Endemism and features several taxa considered endangered and threatened due to anthropogenic pressures and climate change.

The nominated property, defined by the State Party as a continuing and associative cultural landscape, represents a place imbued with spiritual powers, inhabited by gods, spirits, and the ancestors. Within it, cultural values are attached to the natural features, embedded in or embodied by them. Accordingly, hills, water pools, caves, waterfalls, and rapids, associated with invisible entities, represent places of veneration. The numerous shrines of the spirits, sacred caves or sacrificial sites include the Dziwe la Nkhalamba pool, the Likulezi firebreak, the holy cave of Nambirira, and the Machemba rock shelter.

The Dziwe la Nkhalamba pool is believed to be the graveyard linked to the spirits of the Batwa predecessors, or the place where witches and wizards play. It is strongly associated with rainmaking practices.

The Machemba rock shelter is covered with geometric rock art paintings dated to the Stone Age. It is believed to be inhabited by ancestors who intercede for the present communities in exchange for offerings of beer deposited in clay pots.

Religious services held nowadays in the holy cave of Nambirira testify to the enduring sacredness of this space.

Remains of pottery sherds found at the Likulezi firebreak constitute evidence of sacrificial deposits.

The nominated cultural landscape has gained a mystical status among the local population as a dangerous place, where people disappear and strange things happen, often related to harsh weather conditions. The Sapitwa peak is greatly associated with such stories, being seen by some as out of bounds for spiritual reasons. It is also believed that between the Mulanje and Michesi mountains moves Napolo, a serpentine creature that causes severe weather conditions and disasters, like landslides or floods.

The places where mystical occurrences happen or ritual practices take place are not necessarily constant or associated with one geographical location or a specific feature

The sacred places, spirit shrines and other physical features with spiritual associations found within the nominated property are all commonplace in terms of ritual practices in the context of Malawi, and Southern Africa more generally, where African spirituality has been ordinarily practiced since pre-colonial times. However, the accumulation of sacred sites within Mulanje and the still living traditions and widely used spiritual practices are said to make the nominated property a particularly salient example of a sacred cultural landscape. Moreover, the sacredness and power of Mount Mulanje and its surroundings is said to be recognised well beyond the boundaries of the nominated property and Malawi. The mystic qualities of the area and its powerful healing potential related to herbal medicines found among the flora of the area has earnt it a reputation that stretches across Southern and Eastern Africa, even if the biochemical-pharmaceutical qualities of only a small fraction of the medicines have been tested so far. Research is needed to identify valuable indigenous knowledge that could be patented.

The spiritual power of Mount Mulanje can be harnessed by diviners and spiritual healers that have the ability to connect to the spirits. In present-day Malawi, African traditional religions coexist with Christianity and Islam. The introduction of dogmatic religions has led partly to merging of the African cosmological conceptions with religious doctrines but also contributed to the demise of some local traditional spiritual practices, deemed today by some as outdated or associated with witchcraft.

Limited archaeological investigations have been undertaken within the area. However, it has been attested that people were present around the place from at least the Middle Stone Age through Late Stone Age to Iron Age. The first inhabitants of the area were the Batwa huntergatherers who are believed to have found refuge on Mount Mulanje after the iron-making agriculturalists arrived to present-day Malawi around the 3rd century CE. The Batwa were possibly still living in the area in the 17th-18th century. They are remembered today as spirits who live on the mountain and the predecessors of current communities. The later 19th-century colonial history of the area is marked particularly by the presence around Mulanie of the Christian missionaries who aimed to suppress slave trade in the region. Two forts within the nominated property - Lister (national monument) and Anderson (preserved as a mount with scattered bricks) testify to this history. Simultaneously, first cotton, tobacco and coffee plantations developed around Mulanie. later replaced mostly by tea estates which are still a significant feature of the landscape today. Among the oldest in Africa, the tea estates that spread in the southern part of the nominated property symbolise the period of change from the era of slavery to paid labour in the region.

The body of ethnographic and anthropological work specifically focused on the Mount Mulanje area remains limited. The intangible cultural heritage associated with the mountain can be linked to three cultural groups – the Mang'anja, Yao and Lhomwe.

The Mang'anja, who might have been linked to the early iron making agricultural communities, arrived in the area probably with the 14th- 15th-century migration from Central Africa. They used to be involved in blacksmithing and are now predominantly subsistence farmers.

The Yao originated from northern Mozambique. They started moving to the area of Mulanje from the mid-18th century. They used to exist in groups without a centralised organisation. Having been introduced to Islam, they are today predominantly Muslim. Accordingly, some of their practices have evolved under the influence of the religion. Known for their weaving and basket-making, they have been historically involved in trade and commerce.

The Lhomwe migrated to the area from Mozambique at the end of the 19th century; some of them settled among

the Yao and the Mang'anja, others were employed at the plantations. Involved today in agriculture and fishing, the Lhomwe are also known for their pottery-making.

In present-day Malawi, the Mang'anja, Yao and Lhomwe people are socially and economically marginalised.

The cultural practices and beliefs of these groups have interacted with and influenced one another over time, leading partly to some hybridisation or interchange. Their intangible heritage rooted in African spirituality is key to understanding the nominated cultural landscape. It is tied to the physical features of the place as well as the climatological phenomena and botanical diversity. Based on the sacred associations between the natural world and the spirit world, the three groups developed a belief system that has created and sustains the nominated cultural landscape through cultural practices rooted in the human-nature relationship such as rainmaking, ancestor worship, spiritual healing and traditional medicine as well as rites of passage. In exchange, the sacred landscape provides the people with resources (water, food, medicine) that need to be managed sustainably and judiciously.

The sacredness of the landscape is effectively maintained through the practices and beliefs associated with the natural environment, which can be said to constitute in that sense a traditional management system, one that is produced and transmitted from generation to generation. Based on a social contract between the local communities, their Chiefs, Elders, spiritual practitioners and herbalists, the system embraces a set of rules that determine the code of conduct of the community and regulate the norms and behaviours within it based on established spiritual practices and taboos. The herbalists and spiritual leaders are the custodians of this traditional management system, watching over its preservation and transmission of knowledge together with the local community Chiefs, who lead the people. Given the close, spiritually-rooted relationship between the people and their environment, this traditional management system is specifically geared towards the sacredness of the "natural world".

There is paucity of literature regarding the protective nature of spiritual relations between traditional resource users in Mulanje and nature. A comprehensive survey of cultural practices and customs related to the nominated property is yet to be prepared. It could possibly reveal more details about the specific associations between the people and the sacred space of the mountain. However, this type of knowledge is deeply ingrained in the way of life of the local communities and sense of themselves, and may not necessarily be shared openly outside the community. Therefore, it is impossible to provide a full range of practices that govern land-use management in the area and regulate human activity thus contributing to nature conservation.

A substantial amount of research and documentation is also still missing to fill in the gaps in the understanding of

the history of the area and the socio-cultural aspects of the nominated cultural landscape related to the presence of the Yao, Lhomwe and Mang'anja populations around Mount Mulanje, including: documentation of plant usage by Mulanje herbalists; oral history of social life around Mulanje; archaeological excavation at appropriate sites to reflect change of mountain usage over time during different environmental conditions; and a comprehensive ethnographic study of the different local communities and their relation to the mountain, taking into account aspects of continuity and change in the fields of religion, herbalism and economic life.

In the additional information provided in November 2024, the State Party reiterated that the belief system of the local communities evolved with time through cultural interactions, but these changes are difficult to track, except for the most obvious, like the changes in the use of "cultural objects", the disappearance of certain practices from the nominated property (e.g., initiation camps, offerings at the Dziwe la Nkhalamba sacred pool) or change of place of certain rituals. The most detrimental has been the introduction of dogmatic religions, which tend to occupy the same cultural spaces. Nonetheless, the attitude of the communities to the sacredness of the landscape has not changed. It has also been highlighted that African traditional religions drop and take elements as the practitioners see fit, as there are no written prescripts for the beliefs. Research to track the evolution of the practices has not been conducted yet.

Baseline research on the traditional management system of Mount Mulanje has been done following recommendations made in 2014 by the World Heritage Committee and ICOMOS. This resulted in identifying, mapping, and documenting some cultural practices. The State Party hopes to intensify research and documentation of the intangible heritage of the area, which is included as a recommendation in the Cultural Heritage Resource Management Plan (CHRMP) for the nominated property.

Further information was also provided on the tangible expressions of intangible cultural heritage, which relate to natural features such as rivers, mountain peaks, natural water pools. At times, instead of one specific location, the whole area of Mount Mulanje can be associated with a ritual or sacrifice, as is the case of rainmaking practices or traditional healing.

In the additional information provided in February 2025, the State Party confirmed the land area of the nominated property to be of 89,549.18 ha (the figures provided in the nomination dossier were inconsistent). No buffer zone has been proposed for the nominated property.

State of conservation

The nominated cultural landscape, while tangibly embodied in the natural features of the Mount Mulanje Forest Reserve (MMFR) and its immediate surroundings, gets its meaning and significance from the intangible cultural heritage of the local communities. Conservation

efforts thus far have been focused on the biodiversity of the area. Research and monitoring, and reforestation initiatives have been ongoing since the establishment of the Mount Mulanje Conservation Trust (MMCT) in 2000. Despite these efforts, the forest coverage of the nominated property is depleting, the plains at the foot of the mountain range having lost vegetation significantly due to encroachment and land clearing for agriculture. The spread of tea estates in the south and the introduction of plantations of exotic tree species (such as pine and eucalyptus) have changed the landscape and led to the degradation of part of the indigenous flora.

The nominated property is vulnerable to veld fires caused by illegal charcoal burners, hunters, and vandals. The degradation due to fires is particularly visible on the eastern and western sides of Mount Mulanje, where the population density is the highest and where farms are spreading.

The intangible cultural heritage that sustains the existence of the nominated cultural landscape is in a vulnerable state. It requires adequate inventorying and documenting as a matter of urgency. Gradual decline in transmission of traditional knowledge and respect for community values is being observed, exacerbated by the socio-cultural changes engendered by Western-style education and economic system, as well as the introduction of dogmatic religions. Today, the belief system based on African spirituality, while amalgamated with elements of other religions, is still considered relevant by the local communities, even if its adherents are often disparaged by other believers. Yet, younger generations attracted by modernity are losing interest in pursuing the more traditional way of life and developing knowledge around the intangible cultural heritage of their communities. Research on the evolution of the cultural practices and beliefs related to the nominated cultural landscape is urgently needed to better understand the causes of changes to the traditions and the potential impact they might have on the preservation of the sacred space of Mount Mulanje.

Furthermore, in terms of preservation of the cultural landscape, more research is needed on the places and natural features in which spiritual and cultural meanings are embedded within the nominated property, including the assessment of their state of conservation. Among the places of cultural/spiritual value which are already known to be at risk of degradation are the Machemba rock shelter with its rock art and Dziwe la Nkhalamba pool with its shrine

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is satisfying but ecologically fragile. The related cultural values and associations need attention to prevent their dilution and disappearance.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are anthropogenic and environmental. They impact negatively both the natural environment of the nominated property and the associated intangible cultural expressions.

The key dynamic that gives rise to multiple threats appears to be population growth. It leads to encroachment on the area of the nominated property and unsustainable exploitation of its natural resources. Despite law enforcement and local community initiatives, the increased pressure for land has resulted in the deforestation of the southern slopes of the mountain and changes in ecosystems. Combined with the introduction of invasive species, the degradation is substantial. Deforestation is also a result of harvesting of wood to produce charcoal, illegal tree felling, ring-barking and man-made wildfires. While controls have been put in place by the authorities and the communities actively help with patrols and monitoring, management regimes in the country are said to be open to abuse. Pollution of rivers within the nominated property by the dumping of waste has also been observed. A need to develop a comprehensive waste management plan for local villages has been identified.

Another major threat is potential mining. Substantial deposits of bauxite and other minerals are located within the nominated property. Prospects of future exploration have not been clearly denied by the State Party, despite apparent strong opposition from the local communities and conservation bodies. Mining is not only a threat to biodiversity but also to the traditional lifeways. Rare earth elements have recently been found on the mountain in the area of Chambe Basin and Lichenya Plateau (eastern side of the nominated property), which prompted an ongoing Environmental and Social Impact Assessment. A mining licence has been recommended though its issuance is said to depend on the results of the said assessment.

Preservation of the cultural practices and beliefs that constitute the foundation of the traditional management system in the nominated property is threatened by the progressing westernisation of the society. Traditional knowledge is at risk of disappearing, all the more so that it is not protected by contemporary legal mechanisms, nor is it recorded in writing. While elements of Christianity and Islam have been integrated into the local belief system over the years, today the two religions are seen as a factor contributing to the decline of traditional practices. There is no formal legal protection of the intangible cultural heritage of the local communities, nor any programmes that would seek to integrate it with development plans, whether on local or national levels. To the contrary, the Witchcraft Act of 1911 apparently negatively affects the traditional healers, diviners and herbalists who feel stigmatised.

Catastrophic floods, rockslides and other natural disasters indirectly affect the nominated cultural landscape too, by dislocating communities and destroying their livelihoods. Phalombe District has a disaster preparedness plan. Given climate change, the risk of disasters is high and a mitigation plan will need to be prepared for Mulanje District as well.

Among new infrastructure developments within the nominated property, a sports arena is under construction in Likhubula (western side of the nominated property). It is unclear whether Heritage, Environmental and Social Impact Assessments have been conducted for this project.

Currently, tourism mostly represents a threat to the sites considered sacred. Waste left by visitors may become a problem as the numbers of tourists increase.

In the additional information submitted in November 2024, the State Party undertook to review its laws to include legal recognition and protection of the cultural practices and traditional beliefs, and work towards economic upliftment of their practitioners on whom the transmission of knowledge depends.

The State Party also admitted that exploration of minerals has taken place in the landscape, but no mining licence has been given to any company at this stage. It has been explained that the Department of Forestry regulates entry into the MMFR. Therefore, anyone even with a permit to extract or mine minerals or other resources, needs to conform to the regulations of the Forestry Act. which governs the MMFR, and the related policies, which do not allow mining. The traditional management system does not protect the nominated landscape from mining activities, there is therefore no guarantee that mining would not take place in the nominated property beyond the boundaries of the MMFR. The State Party believes that an inscription of the nominated property on the World Heritage List is the only way to keep future extractive industry activities away from Mount Mulanje.

In the additional information of February 2025, the State Party further informed that it revised the Mines and Minerals Act of 2019 in 2023 and adopted the Environmental Management Act of 2017. Environmental Management and Assessment Regulations was also introduced in 2024 and the Guidelines for Environmental Impact Assessment of 1997 revised in 2023. Within this refreshed framework, no mining license can be obtained and no mining activity can be carried out in the nominated property without relevant impact assessment studies and consultations with the affected communities to ensure that activities of mining companies align with community interests. The Malawi Mining Regulatory Authority (MMRA) and Malawi Environmental Protection Authority (MEPA) were established to ensure adherence of mining operations to environmental standards and license conditions.

Moreover, the State Party is working towards gazetting the nominated property to declare it a national monument, which would result in creating a no-go zone for mining in the Mount Mulanje Cultural Landscape (MMCL).

The State Party further informed of several development projects related to tourism planned within the boundaries of the nominated property. A visitor reception and information centre proposed next to the Likhubula Forest offices is at the conceptualisation stage; no impact studies have yet been commissioned. The Integrated Cable Car Resort on Mount Mulanje project includes installing within the MMFR a cable car (using the old cable system installed in the early 1970s) and constructing a mountain inn, a restaurant, an interpretation centre, an eco-lodge, a health spa and a wellness centre. The project has not undergone impact studies. The map provided by the State Party further suggests that the Lichenya Education Research Centre is being planned/constructed (no details provided) in the southwestern part of the nominated property.

Among ongoing infrastructure development projects, the upgrading of the Muloza-Chiringa Road, which constitutes the eastern boundary of the nominated property, to bitumen surface is underway. It underwent Environmental and Social Impact Assessment.

The State Party further suggested that zoning will be introduced to guide further tourism development, with a specific zone outside the nominated property established for tourism-related infrastructure.

ICOMOS welcomes the initiative of the State Party to declare the nominated property a national monument, which would be a no-go zone for mining. Simultaneously, ICOMOS notes that an official government report issued for the period 2020-2021 by the Ministry of Finance and Economic Affairs as a function of the Malawi Extractive Industries Transparency Initiative (MWEITI) includes a list of licenses granted for the period 2020-2021. ICOMOS further notes that, in 2024, a Mining Development Agreement was apparently signed for the Songwe Hill Rare Earths Project, with mining to commence in 2025. ICOMOS considers that no mining is acceptable within a World Heritage property or its immediate vicinity. It reiterates its recommendation from 2014 for the State Party to immediately revoke any mining exploration licenses granted and declare the long-term intention of the government to not initiate mining activities in the nominated property.

ICOMOS further considers that the planned tourism development projects could have a detrimental effect on the nominated property. The Integrated Cable Car Resort project, which is part of the Malawi National Tourism Investment Masterplan 2022-2042 developed with financial support from the African Development Bank, includes, besides major construction, development of activities such as hiking, rock-climbing and off-road cycling in the nominated property.

ICOMOS considers that given the state of conservation of the nominated area and the existing threats to both biodiversity and cultural heritage, tourism – existing and proposed – should be considered as an actual and potential threat both to cultural heritage and to the environmental integrity of the nominated property. Considering the nature of the nominated property (sacred cultural landscape), recreation should be restricted to minimal-impact activities.

ICOMOS also considers that Environmental, Social and Heritage Impact Assessments must be carried out on any project planned within the area of the nominated property and its surroundings, including the ongoing construction of the sports arena.

ICOMOS further considers that the controls and practical mechanisms in place to manage the population encroachment on the nominated property should be strengthened. The observed population growth has led to an ever-greater reliance on the woodlands and indigenous forest trees. Creating alternative economic opportunities to subsistence farming that would enable the local communities to sustain their livelihoods should be considered by the State Party as one of the means of protecting the nominated property. However, employment generation through activities such as tourism should be carefully planned, in order not to add new threats without any guarantee that existing threats will be mitigated.

Formal recognition of the relevance of the intangible cultural heritage of the Mang'anja, Yao and Lhomwe people, and support for the traditional mechanisms of land management by incorporating them in the development plans at the district level could further indicate the understanding by the government of the important role that the traditional management system plays.

ICOMOS considers that the state of conservation is satisfactory, but that the nominated property is ecologically and culturally fragile. The factors affecting the nominated property are serious and are not managed adequately at this stage. Concerted effort of the State Party in close collaboration with the local communities is needed to mitigate the harmful effects of mostly manmade threats. These efforts should go beyond mitigating the effects, in order to address the causes. Extractive industries must be prohibited from the area of the nominated property and its surroundings, and minimal-impact tourism development planned. All development projects must be subjected to Heritage, Environmental and Social Impact Assessments.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated cultural landscape has been created and sustained by the local cultural practices and a belief system which have developed around the sacredness of the area, the natural features and the ecosystems of which are imbued with spiritual powers. It is said to be a potent symbol of Southern and Central African cultural values and belief systems that developed on the basis of African cosmologies.
- The traditional management system that sustains the sacredness of the nominated property represents an exceptional value-based model of stewardship centred on African traditional spirituality. It is defined by codes of conduct, restrictions, and obligations towards access to the sacred spaces and utilisation of natural resources, thus safeguarding the natural environment of Mount Mulanje, which in turn provides people with food, livelihoods and medicinal plants with healing properties.
- Mount Mulanje Cultural Landscape (MMCL) as a
 place of power gives life and takes it away, while
 providing healing and constituting the resting place for
 the spirits of generations of people who have found
 spiritual home in the area. The power of the mountain
 is well known through much of Southern Africa and
 beyond, reaching as far as East Africa and the Horn
 of Africa.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: intangible cultural heritage of the Mang'anja, Yao and Lhomwe people (including cultural practices, beliefs and spiritual ceremonies related to different stages of life, rites of passage, or specific life circumstances, as well as healing); tangible cultural heritage (archaeological sites and architectural heritage that testifies to the occupation and development of the area at different points in time and to specific historical events); biodiversity of the nominated property.

ICOMOS considers that the sacred landscape of Mount Mulanje is "seated in culture". It has not changed in terms of its biophysical features and has also not been extensively shaped by the communities living on the lower slopes of the mountain. The beliefs have shaped the understanding of the place and have given cultural meaning to the mountain, but have not shaped the landscape as such. Villages, farming practices and physical representations of the sacred landscape have been incorporated in the form of shrines and sacred spaces, but its biophysical essence has not changed. Archaeological and ethnographic evidence seems to suggest that the people benefited from the landscape for centuries for their needs, attaching spiritual significance to the natural features of their environment and

associating them with their gods, spirits, and the ancestors. The indigenous spirituality and refrain from damage to the Mulanje landscape emanate from these beliefs. Whilst the cultural groups of Mulanje hold rituals and venerate the sacred spaces of the landscape, it is not evident whether their practices and knowledge systems have shaped the Mount Mulanje cultural landscape.

ICOMOS considers that the nominated property should be seen as an associative cultural landscape rather than an organically evolved continuing cultural landscape.

Comparative analysis

The comparative analysis has been developed around the qualitative assessment of similar properties using thematic (long-standing cultural traditions and practices; spirituality and sacredness; sustainable interaction between humans and their environment; traditional management systems) and typological (cultural landscape) parameters. Chronological and geographical frameworks have not been restricted. Properties throughout the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties as well as other properties have been analysed.

The State Party divided the comparative analysis into two levels — regional and international, comparing the nominated property to a large number of properties, not all of which could be considered relevant. In each case, a brief description of the comparator is provided by the State Party, but it is often not evident or clearly articulated what distinguishes the nominated property to consider it exceptional, besides being simply different. Among the properties not mentioned by the State Party, but which could be considered close comparators, is Bassari Country: Bassari, Fula and Bedik Cultural Landscapes (Senegal, 2012, criteria (iii), (v), and (vi)).

ICOMOS considers that the difficulty in articulating the exceptional character of the nominated property amongst its comparators lies in the fact that the value-based model of stewardship, as practised in the nominated property, is a typical way of managing sacred cultural landscapes/natural sites known throughout sub-Saharan Africa and beyond. Therefore, while singular differences in practices or traditions may be noted, the notion of spirituality and sacredness that gives meaning to the landscape is broadly the same across the many comparators.

However, ICOMOS considers that while the nominated property is part of a wider phenomenon that spans the continent and, in various forms, is also present on a global scale, Mount Mulanje nevertheless represents a particular example, known beyond its boundaries and those of the country, as an area of great power and healing potency recognisable in its healers and medicinal plants. Malawian healers operating in the nominated property and the plants they use are widely believed to be stronger and more potent, making the nominated cultural landscape exceptional and outstanding among other comparators.

Although the proposed comparative analysis does not consider this aspect, it is discussed by the State Party elsewhere in the nomination dossier. In the additional information shared in November 2024, the State Party also provided bibliographical references to confirm the status and reputation of Mount Mulanje outside Malawi, attesting to the supranational significance of the place and its powerful associations.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii) and (vi).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated property is an outstanding example of an African traditional system of management of cultural and natural resources, based on the cultural practices and beliefs developed around the sacredness of the natural environment and particularly its specific features (i.e., geological formations, water sources, hills, trees). It provides insights into a distinctive interaction between people and their land, informed by African cosmologies and grounded in mutual beneficiation. The system is rooted in the intangible heritage of the local communities that has created the cultural landscape of Mount Mulanje and sustains it through spiritually-rooted codes of conduct, obligations, and controls related to the behaviour of the community towards its environment.

ICOMOS considers that the nominated property is distinguished by the profound spiritual significance that permeates its physical environment: the imposing inselberg of Mount Mulanje, the rock shelters, water pools and other features of the landscape which reflect in an exceptional way the spiritual association that the local people have to this area. The nominated cultural landscape can be said to have been created and sustained through living traditions that constitute an exceptional traditional management system based on the values people attach to the sacredness of their natural environment which they protect. The place provides people with resources that should be managed sustainably and judiciously.

ICOMOS considers that this criterion is demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that Mount Mulanje Cultural Landscape (MMCL) has been created and is sustained by the living traditions of the Mang'anja, Yao and Lhomwe people, and their spiritual

practices linked to the natural environment and ecosystems of the nominated property. The varied natural features of the Mulanje Mountain and its surrounding landscape, such as geomorphological forms, water sources, natural phenomena and biodiversity, embody elements of the spiritual world inhabited by gods, spirits and the ancestors.

ICOMOS considers that the spiritual associations that make the nominated property a sacred space sustained through the traditional spiritual practices of the local communities can be considered of outstanding universal significance. While the belief system based on African cosmologies, and expressed through the relationship of people to natural places and resources, is characteristic of spiritual traditions common across Southern Africa and beyond, the specific case of the nominated property stands out. The spiritual power of the nominated property is renowned in the region, invoked by both by local populations and outsiders, and the mountain itself is respected beyond the borders of Malawi as a place that gives life and provides healing. This confirms the outstanding nature of the spiritual association which is at the heart of this cultural landscape. The cultural understanding and relationship of the people to the mountain is shaped by the close interaction of traditional beliefs with the physical environment and natural phenomena. In this context, the mountain and the beliefs about it are inseparable and should be seen in a holistic manner as an associative cultural landscape that serves as a repository of the intangible cultural heritage of the local communities.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the attributes of the proposed Outstanding Universal Value are the cultural practices and beliefs of the Mang'anja, Yao and Lhomwe people that are specifically associated with the area of the nominated property both physically and metaphysically and which sustain its sacredness (e.g., related to ancestor worship, rites of passage or rainmaking), as well as tangible features of the natural environment and ecosystems of the nominated cultural landscape through which this sacredness is expressed and in which cultural meanings are embedded, such as in geological formations, water ponds and rivers, rock shelters, caves, the mountain itself.

ICOMOS does not consider that the archaeological sites and architectural heritage preserved within the boundaries of the nominated property, as identified by the State Party, convey the proposed Outstanding Universal Value. They are less strongly associated with the nominated property but do provide some information on the socio-historical background of the creation of the cultural landscape, and grounds for claims of spiritual continuity between the contemporary Mang'anja, Yao and Lhomwe people and their spiritual predecessors – the Batwa people.

ICOMOS considers that the nominated property meets criteria (iii) and (vi).

Integrity and authenticity

Integrity

The integrity of the nominated property is based on the wholeness and intactness of the Mulanje sacred cultural landscape to which spiritual values are attached by the local communities.

The nominated property includes the mountain range of Mulanje and Michesi as well as the surrounding area, which is deemed to have spiritual powers and is inhabited by ancestral spirits and gods. The intangible aspects of the nominated cultural landscape (the cultural practices related to beliefs associated with nature) do not have physical boundaries. The nominated property lacks adequate mapping and documentation of the full spectrum of spiritual expressions of the Yao, Mang'anja and Lhomwe which are linked to the Mulanje landscape. However, this intangible cultural heritage finds its expression in the associated tangible elements of the natural environment of the area, and specifically the natural features of the Mount Mulanje Forest Reserve (MMFR) and the surrounding area. Accordingly, the boundaries of the nominated property include geological formations (caves, ravines, hills), hydrological system (water ponds, rivers) and elements of the ecosystem (biodiversity) to which cultural values are attached or which embody these values, as well as places where cultural practices are taking place.

Some cultural practices, including traditional healing, divination, initiation ceremonies, traditional dances, and other related cultural expressions of the Yao, Mang'anja and Lhomwe people are not necessarily tangibly linked to the proposed cultural landscape and can thus be practiced beyond the proposed boundaries of the nominated property. Similarly, singular *mpoza* trees that serve as individual "shrines" associated with family units, as opposed to *mpoza* trees of the traditional leaders that serve the community, have been left outside the boundaries of the nominated property as they do not form part of the collective expression of the sacredness of the place.

The integrity of the nominated sacred landscape is threatened by numerous factors mostly resulting from the socio-economic situation of the local communities but also political decisions. Gradual encroachment on the area, introduction of commercial plantations, and the related deforestation, all led to the reduction in size of the forest cover, and the transformation of the landscape and its ecosystems. The tea estates, part of a broader historical context of the nominated property and a source of alternative economic prospects for the local populations, have also contributed negatively over the years to the degradation of part of the indigenous flora. Harvesting of firewood and illegal charcoal processing

further gradually decimate vegetation within the nominated property.

Mining and the planned development of tourism infrastructure represent major threats that should be prevented before damage to the environment is done and negative effects of the political decisions are felt by the local communities.

Despite these threats, ICOMOS considers that the integrity of the nominated property has been demonstrated. However, without effective management of factors negatively affecting the nominated property, which are of serious nature, the integrity of the proposed cultural landscape may be compromised.

Authenticity

The authenticity of the nominated property is based on the use and function, traditions and management systems, as well as forms of intangible heritage that sustains the nominated cultural landscape.

Evaluating the credibility and truthfulness of the intangible heritage associated with the nominated property is challenging due to a lack of proper documentation and historical research on its origins, and the evolution it underwent over the years. Moreover, the cultural practices include rituals and ceremonies that may be private or taboo and relate to the sacredness that exists outside the physical realm. The practices, beliefs, and traditions are not formally documented in written form but are instead preserved through observances and oral tradition. The preservation of traditional knowledge is passed down through generations. This transmission underpins its authenticity. At the same time, African traditional religions tend to evolve, the practitioners adapting the elements as required. The lack of proper documentation of the traditions and practices related to the traditional management of the nominated property and the lack of understanding of why certain practices have been abandoned while others maintained, makes it difficult to assess the impact of change on the nominated cultural landscape; it is therefore difficult to make informed decisions about how to manage this change and what to preserve. Notwithstanding these changes, the attitude of the communities to the sacredness of the landscape remains unchanged.

Documenting the traditional management system is an urgent need, considering the emerging intergenerational gap among the traditional custodians and the gradual decline in affinity with indigenous knowledge and practices due to the introduction of other religions and modern lifestyle. However, ICOMOS considers that the documentation alone will not be sufficient to maintain the cultural values of the nominated property, as the sacredness is entrenched in the landscape through the association with the beliefs and the practices of the communities, which must therefore be sustained. Moreover, while the spiritual connection of the people to the landscape endures despite challenges, the belief

system and traditional management alone are not able to protect the nominated property from the negative impacts of activities resulting from the contemporary economic and social needs of the people. The latter therefore also need to be addressed.

ICOMOS considers that the authenticity of the nominated property has been demonstrated but the State Party should prioritise research and documentation of the spiritual beliefs and cultural practices that are directly associated with the sacred dimension of the cultural landscape, to inform appropriate management and protection of the intangible cultural heritage and thus contribute to the preservation of the authenticity of the nominated property. Keeping the intangible heritage of the local communities alive should be prioritised.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met.

Boundaries

The proposed boundaries of the nominated property follow the circular road that runs around mounts Mulanje and Michesi connecting the Mulanje and Phalombe districts. It includes the area of the MMFR and follows the boundary of Mount Mulanje Biosphere Reserve, inclusive of its transition and buffer zones.

As the inventory of the intangible cultural heritage of the Mang'anja, Yao and Lhomwe people living in the area is not available, it did not inform the perimeter of the nominated property.

The State Party did not propose a buffer zone. The road encircling the nominated property has been said to represent a clear limit and provide a fire barrier. The land uses and the related bylaws outside the nominated property have been considered by the State Party a sufficient "natural" buffering mechanism.

The exact number of inhabitants within the nominated property is not known. However, there are 139 village communities within seven kilometres from the MMFR limit, and the villages are densely populated.

In the additional information of February 2025, the State Party sent several maps presenting the boundaries of the nominated property. A map of land uses within and around the nominated cultural landscape was also shared to argue against the need to create a buffer zone. While the opinion that no buffer zone is required was reiterated, the State Party expressed willingness to consider creating one if it was deemed necessary. The process of establishing a buffer zone and enforcing the relevant regulations would take at least two years and require entering into negotiated contractual agreements with land users.

ICOMOS considers that current challenges in controlling the encroachment of farming into the nominated property, as well as the high risk of fires caused by human activity, suggest that the existing protection within the nominated property and the "natural" buffering mechanism outside of it are insufficient. Moreover, the current land uses and private ownership of land do not necessarily prevent the immediate surroundings of the nominated property from developments that could potentially have negative impacts (e.g., expansion of commercial farming that would produce pollution and noise). Given the already expected population growth within the nominated property that will need to be controlled, the density of the surrounding areas will add to the developmental pressures. Furthermore, the planned development of tourism in the area, if not done with caution, may potentially lead to cultural dilution and eventually cultural disintegration affecting the already fragile intangible cultural heritage of the populations inhabiting the villages within and around the nominated property. Therefore, ICOMOS considers that a formal buffer zone with specific regulations should be created as an additional layer of protection to the nominated property. This buffer zone should support the proposed Outstanding Universal Value by including the areas immediately surrounding it, which are inhabited by the Mang'anja, Yao and Lhomwe people who have communal affinity and historical and cultural connection to the nominated cultural landscape. The relevant regulations should additionally protect the livelihoods and lifeways of the communities whose beliefs and cultural practices give meaning to the nominated property.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies consideration of the property for the World Heritage List. ICOMOS considers that the nominated property meets criteria (iii) and (vi) and that the conditions of integrity and authenticity have been met but both are vulnerable and require urgent attention.

4 Conservation measures and monitoring

Documentation

A basic inventory of archaeological and architectural heritage located within the nominated property is available, but complete community-based inventories of intangible heritage associated with the nominated cultural landscape are missing. The places and natural features in which spiritual and cultural meanings are embedded also require more up-to-date research and documenting, including the assessment of their state of conservation.

The National Archives of Malawi contain a number of documents, including reports on forest conservation, geological surveys, and archival photographs.

The existing inventories and documentation are held by the Department of Museums and Monuments at the Ministry of Local Government, Unity and Culture; the Department of Forestry at the Ministry of Natural Resources and Climate Change, including its Phalombe and Mulanje district offices; as well as the Mount Mulanje Conservation Trust (MMCT).

In the additional information of November 2024, the State Party confirmed that more research on and documentation of the intangible heritage is required. Video documentation of tangible expressions of intangible cultural heritage associated with the proposed values (i.e., natural features imbued with cultural meanings), as well as research reports are available. Understanding changes to the traditional management system needs attention as it is unclear why certain cultural practices have disappeared while others remain pertinent.

ICOMOS considers that it is unclear what documentation is available on the geological formations, hydrological systems, and biodiversity within the nominated property, all of which constitute attributes of the nominated cultural landscape.

ICOMOS considers that detailed baseline documentation of all the attributes of the proposed Outstanding Universal Value, including the tangible elements of the environment with which intangible cultural heritage is associated, and the practices and traditions that sustain sacredness of the landscape and thus directly or indirectly contribute to land management and nature conservation needs to be in place. The current research and documentation are incomplete and not always adequate or up-to-date. The baseline documentation should become the basis for any future management and conservation arrangements and serve the purpose of monitoring and disaster risk preparedness.

Conservation measures

There are numerous conservation programmes in place within the nominated property. Most initiatives are coordinated by the MMCT working in partnership with government agencies, district commissioners, non-profit organisations, as well as local communities and tea estate owners. This work is done under the umbrella of the Mulanje Mountain Biodiversity Conservation Project. Community conservation groups formed at the level of traditional authority areas support the conservation efforts, promoting a culture of stewardship and increasing public understanding of the need to preserve the nominated cultural landscape. While focused on conservation of the natural environment and biodiversity, these programmes also ensure that traditional healers, diviners, herbalists and spiritualists have access to resources from the nominated property, thereby indirectly contributing to the preservation of the intangible cultural heritage. Conservation efforts have been bolstered recently by the involvement of We Forest and the African Parks, whose objectives align closely with those of the MMCT.

ICOMOS considers that the focus of the conservation measures is on the natural aspects of the nominated property, while deterioration of the features of the landscape associated with the intangible cultural heritage, such as sacred sites, shrines, shelters, lacks relevant response. There is an urgent need for the preparation of an

inventory of such sites and an assessment of their state of conservation which would constitute the basis for an appropriate conservation plan. Regular maintenance and monitoring of these sites should be scheduled.

Monitoring

There is no baseline data for monitoring of changes in the state of natural and cultural resources in the nominated property.

The Ministry of Natural Resources and Climate Change has the mandate to implement and monitor activities related to biodiversity and ecosystems protection within the nominated property, while the Ministry of Local Government, Unity and Culture monitors the state of conservation of cultural heritage assets. Periodically, reports are published on the encroachment on protected areas (every two years), invasive species (every five years), state of endemic and endangered species (every five years) and conservation of cultural and heritage assets (every five years).

It is unclear to ICOMOS what data is gathered to inform the monitoring reports and how it is gathered. It is further not well understood against what it is compared since there is no baseline data established to inform interventions.

ICOMOS considers that the existing monitoring system is largely geared towards the biodiversity of the Mount Mulanje Forest Reserve (MMFR) and not the elements of the natural environment, such as rivers or geological formations, which are seen as carrying special sacred meaning to the local communities and are thus the attributes of the nominated cultural landscape.

Moreover, key identified threats, such as fires or pollution, are not addressed in the current monitoring system.

It further appears that there is no monitoring of the changes within the intangible cultural heritage, and more specifically of the practices and activities on which the preservation of key values of the nominated property depends. Special indicators should be developed based on identified threats to the preservation of the intangible cultural expressions that are attributes of the nominated property and form the basis of the traditional management system, and appropriate actions should be designed to respond to possible negative impacts.

ICOMOS also considers that while monitoring is said to be undertaken in cooperation with the local communities, the modalities of this cooperation are not explained.

ICOMOS considers that detailed baseline documentation of all the attributes of the proposed Outstanding Universal Value and the assessment of their state of conservation is urgently needed. It should inform future conservation initiatives and inform management arrangements. Conservation measures should include physical features of the natural environment with embedded cultural values. ICOMOS also considers that the monitoring system

should be further developed to encompass all the attributes of the proposed Outstanding Universal Value and address key threats identified by the State Party. It is advisable that the monitoring system is conceived for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The Mount Mulanje Forest Reserve (MMFR) has been established in 1927. It is governed through the Forestry Act of 1997 (amendment of 2019) and the National Forest Policy of 1996 (under review). This legal framework ensures conservation and sustainable use of forest resources and protects the water catchment function of the Reserve. The Department of Forestry under the Ministry of Natural Resources and Climate Change is responsible for the implementation of the legal framework in relation to the natural environment of the nominated property. Recognising customary rights, this legal framework also allows for community-based natural resources management.

Supporting legislation includes the Environmental Management Act of 2017, Land Act of 2022 and National Parks and Wildlife Act of 2015. Several associated policies are in place.

Since 2000, the area of the MMFR with its outskirts has been designated a Global Biosphere Reserve under the UNESCO Man and the Biosphere Programme and is protected through the Statutory Framework of the World Network of Biosphere Reserves approved in 1995. It includes a core zone, a buffer zone, and a transitional zone. The primary objective of this designation is to conserve the ecosystem, ensuring sustainable use of its resources.

The protection of cultural heritage resources around Mount Mulanje is the responsibility of the Department of Museums and Monuments in the Ministry of Local Government, Unity and Culture, under the provisions of the Monuments and Relics Act of 1990, the Museums Act of 1989, and the Local Government Act of 2010 which empowers local communities to undertake measures to protect their cultural heritage.

There is no intangible heritage legislation at the national level. The traditional management system of the local communities is central in supporting the existence of the cultural landscape of Mount Mulanje. It is enforced through traditional custodianship based on the knowledge-practice-belief nexus. It has ensured a continuous use and preservation of the symbolic and cosmological significance of the nominated cultural landscape. The system provides codified and regulated protocols that inform the sustainable use and management of natural and cultural resources (through for e.g., refraining from felling sacred trees, passing down

mythical stories that emphasise the importance of moderation in resource collection), sustained by a wider frame of religious beliefs that define the roles and obligations and regulate behaviours of the community members. The practices, beliefs, and traditions are not documented in written form, but traditional courts exist to prosecute individuals who violate them.

In the additional information provided in November 2024, the State Party explained that the traditional management system fills the gaps in protection where other statutory mechanisms do not exist.

In the additional information sent in February 2025, the State Party further clarified that the sacred sites within the nominated property are protected through the traditional management system. The State Party will additionally develop, in collaboration with the local communities, visitor management plans and guidelines to control tourism activities, in order to minimise harm to the sacred sites, including introducing measures to restrict access to some of them. Any decisions regarding the use of sacred spaces within the nominated property will require consultations with and consent from the traditional custodians.

The State Party also clarified that Heritage Impact Assessment is included in the Environmental Management Act of 2017. Moreover, heritage law is currently under review and the new bill will include an article requiring Environmental and Social Impact Assessment to be conducted for any project within World Heritage properties.

ICOMOS considers that the current statutory legal framework refers mostly to the area of the MMFR and is focused primarily on the natural environment. It is not clear what protection regimes apply to the area on account of the Global Biosphere Reserve designation. It is also not clear whether the sacred sites, caves or water pools with embedded cultural meanings are seen as cultural assets or not, and under which ministerial control they fall. It appears that they benefit solely from the traditional protection mechanisms rooted in the intangible cultural heritage of the local communities, which itself can be said to be vulnerable as it is not protected by any legislation.

ICOMOS further considers that the effectiveness of the protection measures relies on the collaborative efforts of government departments responsible for enforcing protective legislation, in conjunction with district commissioners and traditional custodians. While the traditional management system contributes to the protection of the natural environment within the nominated property, including outside the boundary of the MMFR, it appears to be insufficient in the face of growing population needs. This has led to the overharvesting of natural resources, encroachment of agriculture and the related deforestation.

Management system

The Department of Forestry is responsible for biodiversity conservation and protection of watersheds within the MMFR. Its staff members are spread across a number of forest stations and assisted by community members.

The Department collaborates with the Mount Mulanje Conservation Trust (MMCT), which is an independent, non-governmental endowment trust established in 2000 and funded by the Global Environmental Facility through the World Bank. The MMCT focuses on biodiversity conservation, research, and environmental education as well as sustainable management of natural resources in the MMFR. It directs the financial assistance of donors to the activities undertaken by local communities. The MMCT is governed by representatives of the government sectors, local traditional leadership, businesses, and civil society. The Mount Mulanje Local Forest Management Board has been established to enable varied actors to participate in the management of the MMFR. Community representatives, traditional leaders from both Mulanje and Phalombe districts are included on the Board.

Cultural heritage resources located within the nominated property are managed by the Department of Museums and Monuments. A cultural officer has been appointed to serve as a site manager for the nominated cultural landscape. More staff specialising in conservation of cultural heritage sites will be deployed once the visitor reception and information centre is built.

A range of other government ministries are involved in varied aspects of the nominated property, including water management, energy-related issues, or land governance.

The local communities, as the customary custodians of the nominated property, are taught from a young age about the sacredness of the area and the need to protect it. The local Chiefs who operate under the framework of the National Cultural Policy lead their village communities in recognising the significance of the traditional knowledge and actively transmitting it, by maintaining the spiritual links between people and their environment through rituals and taboos. The spirit mediums or traditional healers constitute a direct connection between the communities and the spiritual world. They are organised in zones at the level of traditional authority areas, in chapters and associations at the district level, and, at the national level, they form the Malawi Traditional Healers Umbrella Organisation. Only registered healers who subscribe to an established code of conduct are allowed to practice their trade in the area. They actively collaborate with government institutions in delivering services to the public.

In the spirit of participatory management, some communities in the northern, southern, and eastern fringes of the MMFR have entered into Forestry Resources Co-Management agreements with the Department of Forestry. These agreements regulate access to the forest and control activities in it, including gathering of plants. Traditional cultural practices and

beliefs that constitute the traditional management system of the local communities are, however, yet to be integrated into these agreements.

The nominated property is located within the Mulanje and Phalombe districts, and several traditional authority areas. At the district level, environmental management is implemented and overseen by District Councils with authorisation from the Department of Forestry. The district offices work in conjunction with community conservation groups that are based at the traditional authority area level.

The Mulanje District Council prepared the District Development Plan (2018-2022). Both Mulanje and Phalombe districts also possess District Environmental Action Plans. It is unclear, however, whether and how the nominated cultural landscape with its proposed boundaries have been integrated into these planning documents. The intangible heritage has not been acknowledged in them.

The integration of the customary legal system and the formal legal framework has not been completed. During the preparation of the nomination dossier, issues have been raised by community members with regard to the role the local communities should play in the management of the nominated property.

An administrative framework for the management of the nominated property is being currently developed. Within it, the work of government departments responsible for biodiversity and for cultural resources, currently managed separately, will be organised in a collaborative manner. The Department of Forestry is presently leading the process of developing a public-private partnership at the MMFR, which should eventually also include government agencies responsible for cultural heritage and other aspects.

Currently there are two separate management plans. The MMFR Integrated Conservation Management Plan (2020-2030) addresses conservation of biodiversity and use of natural resources and supports adaptation to climate change. The Cultural Heritage Resources Management Plan (2024-2028, CHRMP) defines management of cultural resources. It envisages the creation of a Site Management Committee inclusive of all stakeholders to manage the nominated property. Roles responsibilities will be established. The key objectives of the CHRMP are to: improve the governance of the nominated property by integrating the traditional and the formal management systems; enhance the conservation of cultural heritage resources within the nominated property and develop a risk preparedness plan; strengthen the local human and financial capacity; develop a research agenda and an interpretation and presentation plan; promote sustainable development through tourism; enhance community engagement through partnerships and establishing a beneficiation model; and enhance the preservation of the intangible cultural heritage. The implementation of the CHRMP is the responsibility of the Department of Museums and Monuments.

Eventually, an Integrated Resources Management Plan that would combine the two existing management plans will be prepared. It will be driven by the government departments, the MMCT, and the traditional custodians/traditional authorities.

At present, there is insufficient human and financial capacity within the governance system. The financial resources for the operations come from the budgets of the Ministry of Natural Resources and Climate Change, and the Ministry of Local Government, Unity and Culture. In the past, a large portion of the funds required for management were fundraised through the MMCT.

The land within the MMFR is owned and managed by the State. The land surrounding it is divided between private and community ownership.

ICOMOS requested a map from the State Party to confirm land ownership in the nominated property and the surrounding area. It has not been provided. However, in the additional information of November 2024, the State Party informed that the Monuments and Relics Act of 1990 (section 15) provides for management of monuments and sites on privately owned land. Once the nominated property is inscribed on the World Heritage List, the State shall enter into agreements with private owners to ensure preservation of the nominated property.

ICOMOS also sought information on the cooperative arrangements that have been put in place to coordinate the work of the different institutions and authorities at the district and traditional authority area levels. The answer was inconclusive.

ICOMOS considers that the nominated property requires a multi-sectoral governance structure based on the collaboration between different departments, non-governmental organisations, and local communities, at different levels (national, district, as well as traditional authority areas). It appears that currently, while there are some agreements between the parties in place in relation to the co-management of the MMFR and its natural resources, the modalities of cooperation between the different stakeholders in relation to the entire nominated property, and in particular towards its cultural values, is not well established, and the roles and responsibilities of the different interest groups are not specified or agreed

ICOMOS also considers that the management efforts seem to be focused on the natural environment of the nominated property. Its sacredness is seemingly left solely in the hands of its traditional custodians, who face mounting challenges, both economic and socio-cultural. The State Party should ensure institutional support for the preservation of the cultural practices of the local Yao, Lhomwe and Mang'anja communities that constitute the traditional management system and are required to sustain the sacred landscape of Mount Mulanje. Since

these practices and beliefs convey the proposed Outstanding Universal Value of the nominated property, the focus of management should be balanced between preservation of natural environment which sustains the communities and which is believed to be imbued with spiritual powers, and safeguarding of the intangible cultural heritage of the people which created and sustains the nominated cultural landscape. Accordingly, the State Party should put efforts in developing initiatives supporting the local communities and thus maintaining their association with the nominated property.

ICOMOS further considers that the nominated property requires a stable and sustainable source of funds instead of over relying on non-governmental organisations. The human resources also require strengthening, in terms of numbers and onsite expertise which is currently inadequate to the needs.

It is unclear to ICOMOS what the timeframe for the preparation of the Integrated Resources Management Plan is. The existing management plans focus on natural and cultural aspects of the nominated property separately. It will be important to have both dimensions integrated administratively and strategically to manage the nominated property effectively, especially considering conflicting sectoral legal frameworks.

Visitor management

There are no visitor facilities at the nominated property. Signage is limited and no maps or information brochures are available.

An Info-Mulanje Centre operates in Chitakale, run jointly by the Department of Tourism and the MMCT. It provides basic information and reservation services. Cottages scattered across the nominated property are available for overnight accommodation, alongside lodges and other housing around the MMFR. The Tourism Association of Mount Mulanje and the Mount Mulanje Tour Guide & Porters Association help coordinate the tourism industry locally.

There is no visitor management plan developed for the nominated property. The MMCT is currently formulating a tourism strategy, the primary objective of which will be to generate opportunities for job creation and stimulating economic growth and development around Mount Mulanje.

In the additional information shared in February 2025, the State Party informed about a number of projects that are being currently conceptualised to develop tourism in the area. They include a major development (the Integrated Cable Car Resort on Mount Mulanje) near Likhubula village, which would require considerable changes to the infrastructure. Impact assessments appear not to have been carried out to date.

ICOMOS considers that given the nature of the nominated property (sacred cultural landscape) and its ecological vulnerability, minimal-impact tourism should be

recommended for the nominated property. Any new tourism development project within the nominated cultural landscape or its surroundings should be preceded by Heritage, Environmental and Social Impact Assessments to ensure that there are no negative impacts on the cultural and natural resources, and that potential adverse social impacts are eliminated.

Visitor statistics for Mount Mulanje indicate a considerable number of visitors to the area, but there are no studies to assess the cultural and ecological impacts of increasing tourism on the nominated property.

Community involvement

During the nomination process, local communities raised issues of future access to the nominated property in the event of an inscription, as they are dependent on forest resources. Concerns around the governance and inclusion of local communities in the management of the nominated property have also been indicated.

Currently, community representatives and traditional leaders sit on the Mount Mulanje Local Forest Management Board, which provides strategic guidance to the MMCT. Management arrangements for the nominated property are yet to be made.

The State Party indicated the need to prepare a community engagement framework for the nominated cultural landscape.

In the additional information provided in November 2024, the State Party reiterated that local communities were consulted, and that written consent was received from the leaders. The private landowners were informed about the nomination process and made aware of the implications of a potential inscription on the World Heritage List. Their attitude to the nomination is, however, not clear to ICOMOS.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the current measures of protection of the nominated property are insufficient and need to be strengthened. ICOMOS also considers that since the proposed Outstanding Universal Value is related to the cultural practices and beliefs associated with the nominated cultural landscape, the focus of protection and management should be balanced between preserving the natural environment which carries cultural meanings and the intangible cultural heritage of the Mang'anja, Yao and Lhomwe people that underpins the sacred nature of the nominated cultural landscape, and which is vulnerable to change and dilution, even disappearance. ICOMOS also considers that the management system that is being developed should be based on a multi-sectoral governance structure and be inclusive of the local communities as traditional custodians. Tourism in the area should be developed with caution, and any environmental and social impacts must be mitigated so as not to further weaken the already vulnerable nominated cultural landscape.

6 Conclusion

The Mount Mulanje Cultural Landscape (MMCL), located in the southern part of Malawi, has been created and is sustained by cultural practices and beliefs shared by the the Yao, Mang'anja and Lhomwe people. It is marked by the imposing Mulanje Mountain, one of the largest inselbergs in the world, which raises above the surrounding plains dotted with villages. The area, with its intricate geology, hydrology and ecosystems, is believed to be imbued with spiritual powers.

ICOMOS appreciates the work done by the State Party in response to the key recommendations raised by the World Heritage Committee in 2014, especially those related to the description of the traditional management mechanisms. The commitment of the State Party to intensify research and documentation of the intangible heritage of the local communities is acknowledged.

The proposed comparative analysis, although extensive, is not well focused. ICOMOS nevertheless considers that the information provided in other sections of the nomination dossier and in the additional information are sufficient to justify consideration of this property for the World Heritage List.

ICOMOS considers that the nominated property meets criteria (iii) and (vi) as an associative cultural landscape. The conditions of integrity and authenticity have been met, but the nominated cultural landscape is vulnerable, both in its natural and cultural dimensions, and ICOMOS notes that these are at risk if urgent attention is not given. The pressure arising from population growth and the critical threats posed by planned tourism development must be addressed effectively and any negative impact mitigated. Minimal-impact tourism should be developed in the nominated property. Mining activity must be categorically prohibited.

A formal buffer zone with specific regulations should be created to support the protection of the nominated property. It should include the areas immediately surrounding the nominated cultural landscape, which are inhabited by the Mang'anja, Yao and Lhomwe people who have communal affinity and a historical and cultural connection to the nominated property. The relevant regulations should, among others, provide protection of the livelihoods and lifeways of the communities whose beliefs and cultural practices give meaning to the nominated property.

Greater commitment of the State Party is required to the preservation of the cultural aspects of the nominated cultural landscape; the documentation of the intangible cultural heritage is incomplete, and the deterioration of the associated tangible features requires a relevant response.

The protection and management efforts need to be extended from the natural environment of the nominated property to its sacredness, which currently depends solely

on its traditional custodians, who face mounting challenges of economic and socio-cultural nature.

Given the variety of stakeholders, the nominated property requires a multi-sectoral governance structure, in which the implication of the local communities as traditional custodians of the sacred landscape in decision-making processes should be carefully defined. The integration of the natural and cultural aspects of the nominated property under one Integrated Resources Management Plan should ensure a holistic approach to the protection and management of the nominated property as a cultural landscape.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of the Mount Mulanje Cultural Landscape (MMCL), Malawi, be **referred back** to the State Party to allow it to:

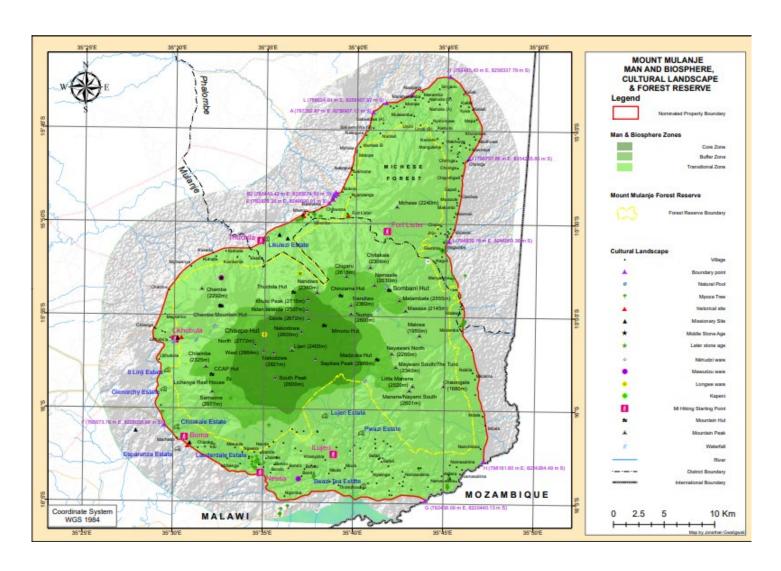
- Create a buffer zone around the nominated property and complete the required arrangements for the enforcement of buffer zone regulations,
- Complete the declaration process of the nominated property as a national monument to ensure that a nogo zone for mining is created within the Mount Mulanje Cultural Landscape (MMCL),
- Finalise the administrative framework for the management of the nominated property, with clearly defined cooperation modalities between different actors and interest groups, and particularly the inclusion of the local communities in the governance structure:

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Undertaking community-based inventories of intangible cultural heritage and developing research to track the evolution of the cultural practices that sustain the associative cultural landscape,
- Preparing an inventory of sites and natural features to which cultural meanings are attached, and assessing their state of conservation to inform the development of an appropriate conservation programme and management arrangements,
- c) Informing the World Heritage Centre of the intention to undertake or authorise all major projects which may affect the proposed Outstanding Universal Value of the nominated property, in line with paragraph 172 of Operational Guidelines for the Implementation of the World Heritage Convention,

- d) Developing and implementing Heritage Impact Assessments as well as Social and Environmental Impact Assessments for all planned and ongoing development proposals (such as the visitor reception and information centre, the Lichenya Education Research Centre, and the sports arena),
- e) Restricting tourism development within the nominated property and its surroundings to minimal-impact projects and activities,
- f) Prohibiting extractive industries from the area of the nominated property and its surroundings,
- g) Strengthening protection of the nominated property, especially the measures to sustain the intangible cultural heritage of the Mang'anja, Yao and Lhomwe people, by ensuring institutional support for the preservation of their cultural and spiritual practices that constitute the traditional management system and are required for the sacred landscape of Mount Mulanje to exist, and by developing initiatives supporting the livelihoods and lifeways of local communities in order to maintain their association with the nominated property,
- h) Completing integration of the customary and formal legal systems,
- Preparing and implementing the Integrated Resources Management Plan that would combine the management of natural and cultural aspects of the nominated property,
- j) Developing further the monitoring system to encompass all the attributes of the proposed Outstanding Universal Value, including the cultural and spiritual practices and beliefs on which the preservation of the cultural values of the nominated property depends, and addressing key threats.
- k) Exploring the qualities of Mount Mulanje in light of natural heritage criteria as initially envisaged in the Tentative List entry.



Revised map showing the boundaries of the nominated property (February 2025)

III Cultural properties

A Africa

New nomination Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination Nomination deferred by a previous session of the World Heritage Committee

Faya Palaeolandscape (United Arab Emirates) No 1735

1 Basic information

Official name as proposed by the State Party Faya Palaeolandscape

Location

Emirate of Sharjah United Arab Emirates

Brief description

The arid desert environment between the Persian Gulf and the Arabian Sea in the Emirate of Sharjah provides evidence of human occupation in Arabia during the early Middle Palaeolithic and Neolithic periods. The archaeological layers of the Faya Palaeolandscape, dating from about 210,000 to 6,000 years ago, form a significant stratigraphic record in the region. The nominated property reflects the presence of hunter-gatherers and nomadic pastoralists, shedding light on human responses to extreme climates. The region alternated between arid and rainy periods every 20,000 years, affecting water availability. Beyond subsistence activities such as hunting and herding, human groups exploited geomorphological features of the site for resource extraction. With its diverse water sources and raw materials, Faya exemplifies an inhabited desert landscape, offering insights into human resilience in hyper-arid environments.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

1 February 2023

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation, and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 6 to 10 October 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 27 September 2024 requesting further information about the justification for Outstanding Universal Value, the boundaries of the nominated property and buffer zone, and its protection and management.

Additional information was received from the State Party on 8 November 2024.

An interim report was provided to the State Party on 20 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further clarification was received from the State Party on 27 February 2025 on archaeological evidence supporting the proposed justification for Outstanding Universal Value, the developed Palaeolandscape Model, and comparative analysis.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Faya Palaeolandscape is in the Emirate of Sharjah (United Arab Emirates) between the Persian Gulf to the west and the Arabian Sea to the east. It includes limestone outcrops called "jebels" and parts of the Hajar Mountains, Rub' al-Khali sand desert, and Mleiha-Madam Plain inland basin. Its morphology is shaped by geohydrological features, lithic raw materials, rock shelters, and the ecotone between the jebels and the basin. The desert environment of this nominated cultural landscape has supported intermittent human settlement over a period of some 200,000 years, despite fluctuations between favourable and hyper-arid climates.

The Faya Range, formed during the Late Eocene-Miocene due to tectonic activity, includes five *jebels*: Jebel Mleiha, Jebel Faya, Jebel Aqabah, Jebel Emailah, and Jebel Buhais. These structures, visible as limestone anticlines, document the history of the Earth from the Late Cretaceous to the mid-Palaeocene (fifty-five million years). Some, such as Mleiha and Faya, include serpentinite layers from the Oman-United Arab Emirates ophiolite.

At Jebel Buhais, the Qahlah Formation features mudstone, ophiolitic breccia, and ophiolite-clast conglomerate topped with a layer of sandstone, indicating a marine transgression. The Simsima Formation (Upper Cretaceous) reveals marine influence from seventy million years ago. Overlying layers, including Muthaymimah and Dammam formations, contain shallow marine limestones. The lithic richness of the landscape arises from natural processes shaping raw materials and their spatial distribution.

In addition to these geomorphological characteristics, geohydrological features were crucial for sustaining human life during the Stone Age. The geohydrological system includes the inland basin of Mleiha-Madam Plain, wadis, water springs, potholes, and paleolakes.

The Mleiha-Madam Plain formed during the Eocene era, through the erosion of the Hajar Mountains due to uplift, marks the final phase of sediment deposition. Gravel deposits were created through alluvial processes and sculpted by fluvial actions into shallow *wadi* channels, which facilitate the movement of surface runoff driven by precipitation.

From the Hajar Mountains, two primary geohydrological features emerge, Wadi Yudayyah and Wadi Baraq, which flow through vegetated riverbeds, channelling water westward. Shaped by erosive forces and topography, the system was carved by water activity from occasional heavy rains, creating channels and valleys in the desert landscape.

In the lower reaches of the wadis, potholes accumulate water after precipitation, ensuring a relatively longer period of availability. These potholes work with freshwater springs, allowing water to be utilised after increased rainfall, and are formed by the grinding action of stones or coarse sediment (sand, gravel, pebbles, boulders), which are moved by the stream current of the activated wadi after rainfall.

The tufa formations along the Faya Range resulted from groundwater in underground aquifers in the Hajar Mountains rising through limestone cracks. Water enriched with calcium carbonate formed tufa when carbon dioxide was released during evaporation. These deposits, marking ancient springs, date back to the interglacial and glacial periods (Marine Isotope Stages 7, 6, and 4), influencing the location of archaeological sites such as Faya 1, Faya 15, and Buhais 18.

Palaeolakes formed between Jebel Faya and the *jebels* of Aqabah and Mleiha due to aeolian and fluvial processes during the Late Pleistocene and Early Holocene. Paleoenvironmental sequences indicate intervals of increased water availability around 55,000, 35,000, 20,000, 11,000, and 6,000 years ago. The cross-sectioned stratigraphy of Mleiha Palaeolake shows climatic shifts, indicating arid conditions back to 3,000 to 5,000 years ago and around 40,000 years ago, with the remaining periods reflecting lake activity or *wadi* flow.

The archaeological features can be divided into two main categories: rock shelter and cave archaeological sites, including Faya 1, Buhais Rockshelter, and Faya 10; and open-air archaeological sites, such as Buhais 18, Faya 15, Thanais 1, Nad al-Thamam, and Agabah 1 and 2.

Rock shelters and cave archaeological sites

Faya 1, a rock shelter at Jebel Faya, spans from 210,000 to 10,000 years ago, covering the Middle and Late Palaeolithic eras. The northern end of Jebel Faya was a source for the extraction of high-quality raw lithic material, with 35,139 lithic artefacts uncovered. The Middle Palaeolithic tools reflect East African traditions, while the Late Palaeolithic tools show regional developments, including in blade technology and the so-called Faya Point.

Faya 10, a cave in the "Wadi of Caves" at Jebel Faya has evidence of human activity from the Late Palaeolithic to Neolithic periods, including lithic production, cremation, and ornamentation. The presence of domesticated animal bones and marine shell beads suggests early Neolithic hunter-herder groups with links to the Persian Gulf. Revisited layers show generational knowledge transfer and social networks.

Buhais Rockshelter at the southern end of Jebel Buhais preserves Upper Palaeolithic layers, with systematic blade production from approximately 36,000 to 17,000 years ago. The lower layer is linked to Middle Palaeolithic traditions, and the site benefits from nearby water sources and lithic materials.

Open-air archaeological sites

Buhais 18, a Neolithic graveyard on the south-eastern end of Jebel Buhais, reveals human activity between 7,000 to 6,000 years ago. It contains 549 skeletons from primary and secondary burials, along with evidence of feasting, indicating mobile hunter-herder societies.

Faya 15, a Neolithic gravesite at Jebel Faya, dates to 6,800 to 6,200 years ago, with both primary and secondary burials, personal adornments, and domestic remains. Excavations uncovered adorned skeletons, beads, marine shells, and dugong ivory pendants, demonstrating stone tool production, animal domestication, and hunting, as well as a reliance on local paleoenvironmental resources.

Thanais 1, on the north-western side of Jebel Buhais, shows evidence of a Stone Age settlement with fourteen fire pits and 300 stone artefacts found. Radiocarbon dating places human occupation between 7,000 and 6,000 years ago. The lithic assemblage includes scrapers and bifacial foliates, revealing insights into tool procurement and production.

Nad al-Thamam, on a dune at Jebel Emailah, has a concentration of lithic artefacts, including bifacial foliates and arrowheads. Excavations revealed archaeological material up to fifty centimetres deep, with radiocarbon dating indicating an age of 9,000 to 8,500 years, offering

evidence of Late Palaeolithic mobile hunter-gatherer occupation.

The Aqabah 1 and 2 sites, between Jebel Aqabah and Jebel Faya, show human activity from the Late Pleistocene. The Wadi Baraq's sand-dammed water flow formed temporary lakes. Aqabah 1, on a high terrace, contains Upper Palaeolithic lithic artefacts similar to those at Buhais Rockshelter (36,000 years old). Aqabah 2, near ancient water pools, revealed Middle Palaeolithic tools, mainly scrapers and notched tools, with different lithic materials and production techniques, maintained *in situ*.

The nominated property has an area of 29,085 ha, and a buffer zone of 65,841 ha.

State of conservation

The geomorphological features constituting the anticline structure are relatively stable, although the impact of a non-operational stone quarry remains visible, as do the effects of modern human activities. Natural erosion effects are considered to be minor. The ophiolite and serpentine structures remain unaltered except for a road that traverses the tectonic uplift area in Mleiha.

Regarding the geohydrological attributes, the Mleiha-Madam Plain has retained its original morphology despite the presence of individual farms and construction works across the plain, in addition to the road crossing the inland basin. With regard to the wadis, the S153 double highway road is built parallel to the wadis in certain areas and is constructed directly upon the wadi bed in others. A variety of structures are installed within the wadis.

Most of the archaeological attributes excavated through both invasive and non-invasive methods remain unaltered. However, the open-air sites are more susceptible to natural erosion, affecting both artefacts and earth strata.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the overall state of conservation of the nominated property is vulnerable due to the impact of modern development on the proposed attributes.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are environmental dynamics, development pressures including transportation and service infrastructure, and visitor impact.

Environmental dynamics such as wind and water erosion gradually alter geological formations; open-air archaeological sites are especially vulnerable to artefact disturbance. Additionally, severe weather events such as sandstorms and flash floods pose immediate localised threats to archaeological sites such as Faya 15 and Buhais 18.

The development pressures encompass the introduction of visitor infrastructure, including hotels, cafés, and a sports stadium, in addition to a recreational activity park for driving all-terrain vehicles. Furthermore, residential and commercial construction is occurring along the roads and wadi beds, in small agglomerations or in isolated structures situated within the nominated property.

The ground transportation infrastructure represents a concern regarding the integrity of the nominated property. Numerous roads traverse the nominated property, including one constructed along Wadi Baraq, which overlaps with the riverbed between Jebel Aqabah and Faya.

The service infrastructure includes linear utilities such as power lines. The management authority plans to adjust the lines to bypass key archaeological areas and transition to underground cables.

ICOMOS considers that the state of conservation is vulnerable due to factors affecting the nominated property, and that this would require adequate monitoring.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Faya Palaeolandscape, in view of archaeological and paleoenvironmental evidence, is an exceptional example of a Stone Age desert landscape, documenting one of the earliest records of human occupation of the area from the early Middle Palaeolithic to the Neolithic, under varying climatic conditions on the Arabian Peninsula.
- The preserved evidence on-site illustrates the evolution of societal structures, from hunter-gatherer groups to pastoral nomadic herders with complex funeral practices, offering new insights into human adaptation to challenging desert environments.
- As one of the earliest known inhabited desert landscapes, it addresses significant gaps in understanding early human development and adaptation in the Arabian Peninsula, even during periods of extreme aridity.

ICOMOS notes that the State Party indicates that the geographic position of the nominated property suggests it may have been an integral point on a prehistoric migration route out of Africa, potentially making it an exemplary site for illustrating human behavioural evolution and dispersal. However, this aspect is not explicitly included in the proposed justification for Outstanding Universal Value.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows:

- Geomorphological attributes: comprising the Faya Range, which includes five *jebels*: Mleiha, Faya, Aqabah, Emailah, and Buhais; and the dunes of Rub' al-Khali desert.
- Geohydrological attributes: encompassing the inland basin (Mleiha-Madam Plain), wadis, water springs (tufa formations), potholes, and paleolakes.
- Archaeological attributes: including rock shelters and cave archaeological sites (Faya 1, Buhais Rockshelter, and Faya 10), as well as open-air archaeological sites (Buhais 18, Faya 15, Thanais 1, Nad al-Thamam, and Aqabah 1 and 2).
- Further known but unexcavated archaeological sites.

Comparative analysis

The comparative analysis has been developed around six interdependent parameters: sites with Palaeolithic findings; sites with Neolithic findings; sites with intermittent Stone Age occupation; sites showing human adaptation to the arid/semi-arid climatic conditions; desert landscape environments; and sites with the availability of palaeohydrological features. It has examined properties throughout the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

Forty-two properties in Africa, Asia, the Pacific, and Arabia were grouped into two categories: those meeting at least five of the six parameters; and those meeting one to four parameters.

Twelve properties were determined to belong in the first category and were therefore considered to be the closest comparators. These included properties such as Wadi Rum Protected Area (Jordan, 2011, criteria (iii), (v) and (vii)); Sites of Human Evolution at Mount Carmel: The Nahal Me'arot / Wadi el-Mughara Caves (Israel, 2012, criteria (iii) and (v)); Mundafan and Khujaymah Palaeolakes (Saudi Arabia); and Dhofar Region (Nejd Plateau) (Oman).

The nominated property is said to stand out in comparison to these twelve properties for various reasons. In the case of the Dhofar Region, for example, the geomorphology and topography are not considered by the State Party to be representative of a complex mosaic of interrelated attributes, which would be located in a concentrated area where water was limited, nor is there a distinct stone tool tradition. The analysis also highlights the proximity of the region to the coast, grassland, and water as being more conducive to human life. However, ICOMOS considers that the argument put forward by the State Party, based on environmental change, does not appear to be a characteristic sufficient for the nominated property to meaningfully stand out.

The additional information provided by the State Party in response to the interim report highlighted that Dhofar's archaeological record is fragmented while Faya's sedimentary conditions preserved a more complete cultural sequence.

Of the comparators meeting one to four parameters, the Nefud Desert in Saudi Arabia is compared with the nominated property. The State Party concludes that the Nefud Desert may show patterns of adaptation to a climate with higher aridity than the nominated property, due to its greater inland position and isolation from coastal climate effects. However, the analysis states that the intermittent periodic occupation of the Nefud Desert provides evidence that it was not inhabited during the drier periods, in contrast to the nominated property. These claims do not appear to be supported by adequate scientific research.

The additional information provided by the State Party in February 2025 further argued that the nominated property stands out for its features which allowed continuous occupation while the occupation in the Nefud Desert relied on the presence of interdunal lakes which disappeared during periods of aridity.

Other potentially comparable sites include El Kowm (Hummal, Umm el Tlel, and Aïn al Fil) in Syria and the Alborz Range in Iran. The comparative analysis indicates that El Kowm does not provide substantial evidence of human adaptation to a changing climate in desert environments. While it provides evidence of human adaptability, the State Party contends that the link to specific climate changes and adaptations may not be as explicitly documented as in the case of the nominated property, which has more detailed climatic data.

ICOMOS considers that the absence of recorded climatic shifts does not imply their non-existence, given that the El Kowm site covers almost the entire history of human evolution from approximately 2.5 million to 12,000 years ago.

As for the Alborz Range, the lack of sufficient comparable data on adaptation and the limited archaeological research are cited to justify the distinctiveness of the nominated property. ICOMOS considers that, on the contrary, the comparison reveals that the lack of available documentation represents a significant obstacle to understanding prehistoric human occupation and climate history in Arabia, rather than highlighting the distinctive character of the Faya Palaeolandscape.

Research projects such as Green Arabia are ongoing to address these knowledge gaps by investigating key sites in the Nefud Desert. The primary objective of the project is to gain insight into Quaternary climate changes and their impact on human dispersals in Arabia. Initial findings have provided critical insight into how shifts between wetter and drier periods may have affected human occupation and movement across the Arabian Peninsula. Given that scientific projects are still uncovering crucial data and numerous potential sites remain inadequately researched or poorly documented, it is evident that these initiatives have yet to provide a sufficient basis for a comprehensive regional analysis.

ICOMOS considers that the gap in archaeological and environmental records makes it difficult to assess the role of the nominated property in a wider landscape, particularly in terms of its contribution to migration routes out of Africa or its environmental history.

The comparative analysis, conducted as a checklist of parameters, provides a structured approach but oversimplifies the relationships between the attributes and the potential Outstanding Universal Value. Furthermore, the interdependent parameters do not allow for the assessment of the stand-alone value of each group of attributes. The typological approach based on the nominated property being a desert landscape limits the possibility of comparison with sites that do not exhibit a sand desert landscape.

Despite the revised comparative framework provided by the State Party in response to the interim report, ICOMOS considers that there is insufficient basis to establish, on a comparative basis, the exceptionality of the nominated property in line with the proposed justification for inscription.

ICOMOS does not consider that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii) and (iv).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party based on archaeological evidence of continuous human occupation in harsh and shifting climate conditions from the early Middle Palaeolithic to Neolithic periods. The evidence would demonstrate human adaptation to the challenging desert environments in the Arabian Peninsula. Stratigraphic data would indicate that early human groups occupied the region during both hyper-arid and more favourable conditions. Marine Isotope Stages, although showing that temporary abandonment periods overlap with periods of harsh conditions, would indicate that occupation also occurred during harsh periods.

The nominated property is seen as an example of intermittent occupation, highlighting the remarkable ability of early human groups to adapt to extreme climates. However, the nomination dossier does not explain how occupation during hyper-arid conditions makes the nominated property stand out as compared to other sites in Arabia, nor does it provide evidence that this is unparalleled elsewhere.

ICOMOS considers that, while the site demonstrates human occupation, no direct link to a distinct, integrated cultural tradition or civilisation can be established. The site reflects human responses to environmental changes

rather than a specific cultural tradition, limiting its alignment with this criterion, which is based on cultural tradition. The nomination dossier suggests intermittent occupation driven by environmental factors, rather than continuous cultural development on the site.

The additional information provided by the State Party in response to the interim report highlights shifts in tool production regarding blade and bladelet tools, however, these represent more material economisation rather than cultural complexity. In comparison with sites such as Dhofar, Faya lacks distinctive technological traits that would differentiate it as an independent centre of innovation.

Furthermore, while the nomination dossier offers an overview of human occupation and dispersal across Arabia, it does not provide a coherent narrative relating to a specific culture. There is only limited reference to the human groups that occupied the site. While early modern humans are mentioned, it is not specified that Homo sapiens created the discovered tools.

ICOMOS also notes that the archaeological record contains insufficient evidence to substantiate the hypothesis that the early human groups that inhabited the nominated property belonged to anatomically modern human species.

Consequently, ICOMOS considers that the current state of knowledge does not allow such conclusions to be drawn at this stage. Further fossil evidence would be necessary to resolve this uncertainty.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that the nominated property would represent an exemplary Stone Age desert landscape typology, distinguished by unique geomorphological and geohydrological features. These preserved features, which capture paleoclimatic variations across multiple Marine Isotope Stages, would provide a valuable foundation for research on environmental and climate evolution. According to the State Party, the ability of Palaeolithic and Neolithic groups to adapt to their environment is linked to the landscape features in situ, subject to fluvial and aeolian processes. These features supported the survival of these groups during climatic shifts. The State Party contends that the nominated property represents a significant phase in human history, as evidenced by environmental and archaeological records that document early human-environment interactions and the responses of ancient communities to changing natural conditions.

ICOMOS observes that shifts in occupation across different historical periods in the chronology of the nominated property have not been demonstrated. The nomination dossier suggests that there is no evidence of human occupation in Arabia during the postulated arid periods of approximately 190,000 to 130,000 years ago, 75,000 to 60,000 years ago, and 29,000 to 12,000 years ago. It also does not demonstrate precisely how early modern humans adapted to the environment, particularly how the tool repertoire at the nominated property differs stylistically and technically from those at other regional sites, which would have enabled the population to adapt to the harsh climate.

Furthermore, there is limited documentation of how human groups managed resources or responded to changing environmental conditions, beyond relying on the inherent features of the site. Demonstrating dynamic human-environment interactions would be crucial for establishing the contribution of the site to broader narratives of human adaptability.

The additional information provided by the State Party in response to the interim report indicates that the shift in mobility of human groups, from logistical to residential, can be seen as an adaptation measure. However, this change appears driven by increasing aridity and resource scarcity, and therefore reactive rather than innovative, aligning with broader regional trends rather than being site-specific.

Skeletal evidence of early modern humans dating to around 55,000 years ago is notably absent, despite supporting data indicating increased hydrological activity in the Faya region, including the formation of water bodies. Therefore, the claim that the site provided resilience during hyper-arid periods remains unproven. Paleoenvironmental and archaeological records suggest that Marine Isotope Stage 6 (165,000 to 141,000 years ago) was not consistently hyper-arid. Instead, brief phases of increased rainfall and vegetation development during periods such as Marine Isotope Stage 15, and likely Stage 13, made human occupation possible.

It was highlighted in the response of the State Party to the interim report that the absence of fossilised evidence is attributed to climate conditions. However, this contrasts with neighbouring sites where such remains are present. In addition, there is no evidence of physical modifications to the environment that might demonstrate human ingenuity. While the nominated property offers insights into immediate survival strategies, the lack of such key elements prevents it from providing sufficient evidence of continuous long-term processes of behavioural changes that would demonstrate *in situ* adaptation.

While the Palaeolandscape Model that articulates the values of the site within the interconnected system of geomorphology, hydrology, climate, and human activity was initially absent in the dossier, the State Party provided it in February 2025 in response to the ICOMOS interim report.

ICOMOS notes, however, that the Palaeolandscape Model presented as evidence of adaptation primarily highlights environmental facilitation rather than cultural adaptation and does not demonstrate progressive adaptation but rather recurring occupation of the landscape.

Such a model is essential to demonstrate the significance of the nominated property within a broader archaeological and paleoenvironmental context. Without it, representations risk being incomplete or misinterpreted. Developing further this model is crucial to link the collected data with the defining features of the Faya Palaeolandscape, providing a clear representation of how the landscape appeared and functioned during the early Middle Palaeolithic and Neolithic periods.

ICOMOS considers that this criterion is not demonstrated.

ICOMOS considers that the claims for the interconnection between natural and cultural elements are not sufficiently substantiated to justify considering the nominated property as a cultural landscape. The combination of archaeological sites and landscape cannot be considered as a cultural landscape, as the precise way in which this landscape has shaped the human settlements in an outstanding way has not been demonstrated. It is indicated that human occupation persisted through both wet and dry periods, yet no explanation is provided as to how the arid conditions shaped the settlements during those dry periods. Evidence is needed to demonstrate that this interaction both shaped and sustained a distinctive way of life.

ICOMOS considers that since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated, respective supporting attributes cannot be confirmed.

ICOMOS does not consider that any of the criteria have been demonstrated.

Integrity and authenticity

Integrity

According to the nomination dossier, the site is of adequate size to encompass all the key geomorphological, geohydrological, and archaeological elements necessary to express the proposed Outstanding Universal Value. The archaeological attributes remain in situ, undisturbed by research activities, allowing for a comprehensive understanding of the human adaptation of early modern humans. Structural integrity is ensured through the direct interrelation between archaeological sites and water sources. While surface water no longer flows and the landscape no longer displays similar hydrological dynamics, the underground water system remains functional. There is a visual impact on the nominated property caused by nearby power lines, in addition to surrounding development pressure, which is being monitored and will require further mitigation in the future.

ICOMOS observes that roads traversing the site have introduced modern alterations that have an impact on the natural morphology of the landscape. The roadway built on the bed of a wadi may have damaged the sedimentological deposits and disrupted the proposed hydrological attributes, thereby impacting the integrity of the nominated property. Furthermore, ICOMOS notes that the nominated property is adversely affected by power lines and urban development which also have an impact on the values of the landscape. Activities at the decommissioned quarry have had a negative impact both visually and functionally. The State Party has confirmed that these activities will no longer take place in areas of archaeological or geological value.

Past and current research activities have been non-intrusive. The State Party indicates the need for further excavation, with the methods yet to be determined. The absence of clear material evidence attributable to early modern humans or a specific hominin group creates a gap in understanding the population that inhabited Faya, as well as the associated chronology.

The intermittent archaeological evidence reflecting climate-induced alternations between abandonment and reoccupation is insufficient to support an uninterrupted narrative of the nominated property as representative of stable and continuous occupation and adaptation by early modern humans. The incomplete sequences of human presence, along with elements yet to be excavated, limit the archaeological background and prevent the assessment of whether all relevant attributes are included within the boundaries of the nominated property to illustrate the adaptation of early human groups in a holistic manner.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated, attributes of Outstanding Universal Value cannot be confirmed and integrity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated.

Authenticity

The State Party justifies the authenticity of the nominated property based on its well-preserved cultural and natural significance, conveying its history in a credible manner. The key features include the defining desert landscape typology, such as the Faya Range and various types of sand dunes at Rub' al-Khali. Environmental features, such as the wadis and paleolakes, reflect stable conditions since the Meghalayan Age of the Holocene, indicating early human adaptation. Archaeological features comprise *in situ* artefacts, showing the shift from hunting-gathering to nomadic pastoralism. The State Party states that the authenticity, visual appearance, and functions have remained unchanged to a high degree, despite inevitable minor changes.

ICOMOS observes that the landscape has been impacted by urban pressure and the construction of roads, including on the riverbed of one of the wadis. The impact of urban development is not limited to isolated incidents but extend to concentrated areas such as the Mleiha and Al-Ruwadha agglomerations.

These modern interventions, some of which traverse or are superimposed on the proposed key attributes, have an impact on the desert typology and affect the historical environment in which human groups lived. ICOMOS considers that such modifications have an impact on the authenticity of the landscape and its representation of the historical desert context.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated, attributes of Outstanding Universal Value cannot be confirmed and authenticity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have not been met.

Boundaries

The State Party has provided a comprehensive description of the boundaries of the nominated property, though a clear rationale has not been included for the delineation of the nominated property or of its buffer zone.

In the additional information of November 2024, the State Party clarified that the nominated property was defined to include all attributes, to represent different landscape types, to align with existing legal delineations, and to arrange these elements along road corridors and property plots.

ICOMOS notes that while the proposed attributes are included within the boundaries, the delineation forms a nonorganic shape that does not follow the natural contours of the topography of the landscape. Such a landscape, with its multi-layered composition of geomorphological, geohydrological, and archaeological elements, requires boundaries that follow these elements. Their current shape, with straight lines and angles, fails to respect them. Moreover, boundaries must safeguard the attributes, which is not evident from the proposed delineation, as it cuts through key proposed attributes such as wadis.

The wadi channels, fundamental elements of the geohydrological system, extend beyond the designated boundaries, raising concerns about whether the hydrological and geomorphological features are fully captured, or have been partially omitted due to boundary cuts.

Additionally, only a small portion of the Rub' al-Khali sand desert is included within the proposed boundaries – that is just 0.03 percent of its total surface area – which is insufficient to represent the dynamics of occupation and adaptation in the largest area of continuous sand in the world. Complex and varied patterns of human settlements and dispersal likely occurred across this vast desert,

making the spatial continuity of the nominated property across Rub' al-Khali questionable.

The scope of the nominated property appears incomplete and may not encompass the full extent of the relevant landscape, whose significance could extend beyond the currently defined boundaries.

Evaluation of the proposed justification for inscription

The nomination provides an incomplete and fragmented perspective on multiple levels.

With ongoing research in the Arabian Peninsula yielding ground-breaking insights into its climate history and human migration out of Africa, it remains challenging to objectively assess the contribution of the Faya Palaeolandscape to these processes across Arabia without a more holistic understanding of climate history and human dispersal dynamics. Furthermore, the comparative analysis fails to demonstrate how the nominated property stands out, as its structure limits comparison with relevant comparators.

Furthermore, the nomination does not demonstrate how the Faya Palaeolandscape reflects long-term human adaptation, as opposed to short-term survival responses reliant on the natural features of the site. The evidence suggests recurrent, opportunistic occupation in response to periods of environmental availability, rather than continuous settlement sustained by behavioural or cultural adaptation. Therefore, ICOMOS considers that, due to insufficient archaeological background, criteria (iii) and (iv) have not been demonstrated. Accordingly, the conditions for authenticity and integrity have not been demonstrated.

In summary, ICOMOS considers that the scope of the nominated property may be incomplete and may not capture the full extent of the landscape, whose significance likely extends to a broader regional scale.

4 Conservation measures and monitoring

Documentation

The State Party indicates that a detailed baseline report on the state of conservation of the nominated property is in the process of being compiled. Nevertheless, the State Party contends that the state of conservation has been maintained due to its remote and minimally disturbed context.

The region has been a focus of ongoing research for decades, with new archaeological areas continually being discovered and reported. Consequently, the nominated property is routinely and thoroughly documented through annual archaeological surveys, legal agreements, research initiatives, and recording of discovered artefacts. The State Party also highlights that ongoing monitoring is facilitated

by means of systematic comparisons, with this preliminary body of documentation serving as a reference.

ICOMOS acknowledges that the ongoing research has enabled documenting archaeological discoveries, but considers that this does not replace a comprehensive baseline conservation assessment of the state of conservation. A complete holistic inventory of the significant geomorphological, geohydrological, and archaeological features of the landscape, as well as a comprehensive conservation plan, must be established to constitute a basis for monitoring and decision making.

Conservation measures

Conservation is mentioned under the strategic objective for conservation and monitoring of the State Party, and focuses on preserving the integrity of the nominated property through a comprehensive conservation approach. This includes implementing both preventive and intervention-based measures to address erosion, to stabilise fragile remnants, and to maintain the proposed archaeological, geological, and environmental attributes of the nominated property. The State Party does not mention the existence of a conservation plan with clearly defined conservation activities.

ICOMOS notes the importance of a conservation programme for maintaining integrity. Its implementation should therefore be continued and supported by a reliable flow of resources. It further stresses the importance of developing a framework to guide conservation activities and ensure their coherence throughout the nominated property.

Monitoring

Based on an analysis conducted during a management plan workshop held in 2022, conservation and monitoring have been identified as a strategic objective for the management of the nominated property. The monitoring framework defines a set of actions, measures, indicators, and periodicity for both the action plan and the subsequent quality assessment.

While the monitoring framework is well-structured, the extent to which it is operational should be confirmed.

ICOMOS considers that the nominated property lacks consolidated documentation, which is crucial to prepare a well-informed conservation policy and programmes. Such documentation should be prepared, and a comprehensive conservation plan should be developed to constitute the basis for the state of conservation and to inform the monitoring framework.

5 Protection and management

Legal protection

At the national level, the 1971 Constitution of the United Arab Emirates is the foundation of the legal framework for heritage conservation. It allows the coexistence of federal and state laws regarding heritage protection, management, preservation, and conservation. Federal Law No. 4 of 2020 provides the highest level of protection for the Faya Palaeolandscape. It designates the nominated property as a cultural landscape of significant importance to the United Arab Emirates due to its inclusion on the World Heritage Tentative List. Federal Law No. 24 of 1999 for the Protection and Development of the Environment aims to prevent or mitigate environmental degradation.

In addition, Federal Law No. 11 of 2017 on Antiquities focuses on the ownership, registration, and protection of archaeological objects (antiquities). It plays an essential role in preserving the archaeological heritage within the nominated property by establishing strict regulations and penalties against activities such as the illegal excavation and trading of antiquities. These legislative mechanisms serve as the foundational framework for the protection of both the nominated property and its buffer zone at the federal level.

At the state level, Sharjah Law No. 6 of 1998 defines the establishment and tasks of the Environment and Protected Areas Authority (EPAA) and outlines its responsibilities for the management, protection, and conservation of the environment and protected areas in Sharjah. This includes the environmental features and protected areas within the nominated property. Sharjah Law No. 1 of 1992 plays a crucial role in protecting archaeological areas within the Emirate. It includes clear instructions for identifying, registering, and preserving antiquities and cultural artefacts. Emiri Decree No. 16 of 2024 establishes the Mleiha National Park in the Emirate of Sharjah, defines its geographical boundaries, and assigns its management to the Sharjah Investment and Development Authority (SHUROOQ).

Emiri Decree No. 5 of 2018 recognises the establishment of an environmental and archaeological protected area at Jebel Buhais, which covers part of the nominated property. It outlines the responsibilities of the Sharjah Archaeology Authority (SAA) and the EPAA for the management of the respective area. Emiri Decree No. 57 of 2016 officially established the SAA as an independent authority within the Emirate of Sharjah. This Decree, which is directly linked to Sharjah Law No. 2 of 2017, provides the legal framework for the organisation and responsibilities of the SAA. In general, the Emirate of Sharjah entrusts the management, protection, and promotion of archaeological sites and cultural heritage to the SAA. In the context of the Faya Palaeolandscape, the SAA also represents the managing body of the nominated property.

ICOMOS acknowledges that there is legal protection in place at the national and regional levels through various laws, decrees, and regulations, but considers that the

current legal protection measures might not be sufficiently effective in light of the current state of conservation of the nominated property.

Management system

The SAA is responsible for managing the Faya Palaeolandscape. This includes oversight of all geomorphological, geohydrological, and archaeological elements that constitute the proposed key attributes of the nominated property. Within the management system of the Faya Palaeolandscape, the SAA is entrusted with executing and supervising the management plan and designating the site manager as the highest administrative position. The Director General of the SAA serves as the representative of the entire Authority and would act as World Heritage Site Manager. The Director General also oversees the World Heritage nomination process.

In addition to general responsibilities within the SAA, the Director General also oversees the work of the Archaeology Department and the Tangible Cultural Heritage Department. The day-to-day management of the nominated property is a collaborative effort involving SHUROOQ and the SAA. The roles of the SAA include providing expert knowledge, implementing legislative measures, and monitoring and conserving the nominated property. SHUROOQ, as the operational entity at the Mleiha Archaeological Centre, oversees the on-site educational, touristic, and informational programmes.

The nominated property includes six designated environmental and/or archaeological protected areas. Heritage and Environmental Impact Assessments are required for any proposed developments, alterations, or modifications to the nominated property and buffer zone boundaries. All proposed developments and transformation projects within the boundaries of the nominated property must be authorised and approved by the SAA.

The management plan of the nominated property, which was developed between 2021 and 2023, is the guiding document for the management system. The management plan was developed through a participatory process. It defines a common vision as well as four strategic objectives for the management of the nominated property: protection and governance; conservation and monitoring; archaeological, geological, and paleoenvironmental research; and visitor management and site interpretation. A set of actions has been developed under each of the four strategic objectives for the nominated property.

ICOMOS considers that the management plan provides a comprehensive framework to address the pressing conservation and management issues of the nominated property. Nevertheless, it must be synchronised with the baseline report on the state of conservation once the latter is completed, to ensure that the conservation interventions are based on an accurate assessment. The implementation of the management plan is of outmost importance.

Visitor management

The Faya Palaeolandscape has two visitor facilities: the Mleiha Archaeological Centre and the Buhais Geology Park. They are tourist centres that play a key role in raising visitor awareness about the geological and archaeological significance of the nominated property. Opening its doors in 2016, the Mleiha Archaeological Centre is situated on the eastern side of the Faya Range. It is jointly managed by the SAA and SHUROOQ. It offers guided excursions, educational workshops, and on-site visits.

Local staff members who specialise in the history and significance of the area are available to accompany visitors to the archaeological sites at Jebel Faya and Jebel Buhais. The Buhais Geology Park, managed by the EPAA since 2020, is an educational and interpretation centre on the north-eastern side of Jebel Buhais. Visitors can take self-paced excursions or guided tours, and educational excursions are available for private groups, universities, and institutions.

In addition to the educational programmes offered by the two main visitor facilities, several private companies operate within the nominated property. They offer different types of sand-dune safaris, paragliding, and a sports stadium, among other experiences and venues. As acknowledged in the management plan, these activities represent disruptive elements and risks to the conservation of proposed natural attributes and features such as the Rub' al-Khali sand desert.

Currently, the sand desert landscape west of the Faya Range is experiencing a touristic overuse due to an unsustainable number of sand-dune safaris, thus risking the integrity – and potential destruction – of different sand dune formations. Some major tourism accommodations and their associated recreational infrastructure have also been affecting the Faya Palaeolandscape.

ICOMOS considers that the current impact of tourismrelated activities within and near the nominated property necessitates intervention through the implementation of key conservation actions outlined in the management plan and revision of the current tourism strategy for the Faya Palaeolandscape.

Community involvement

The geographic extent of the nominated property encompasses three municipalities, Bataeih, Mleiha, and Madam. The buffer zone extends to encompass the municipality of Dhaid. Several larger urban centres, including Mleiha and Madam, are situated where a substantial portion of land is privately or commercially owned.

The local communities are involved in the protection, conservation, and management of the nominated property in two ways: they are consulted as stakeholders in the process of preparing the management plan of the nominated property (identification of the strategic objectives, for example); and they are employed as guides within the Mleiha Archaeological Centre.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the nominated property is legally protected under the highest level of cultural and natural heritage protection in the State Party. However, the existing legal protection measures might not be considered sufficiently effective in light of the factors affecting the present state of conservation of the nominated property, particularly regarding infrastructural development and tourism-related activities.

Tourism-related recreational activities impacting the sand dunes, along with major tourism infrastructure constructed on-site, directly affect its integrity, making immediate intervention necessary as per the management plan.

A management system is in place, and the management plan provides a comprehensive framework to address the pressing conservation and management issues, which must be synchronised with the baseline state of conservation report once finalised. However, the effectiveness of management depends on the execution of the management plan.

6 Conclusion

The Faya Palaeolandscape has been nominated as an exceptional example of a Stone Age desert landscape.

ICOMOS notes that given the early stage of research on migration routes out of Africa and of the construction of the climate history of Arabia, it is not possible to assess the contribution of the nominated property to these dynamics without a comprehensive understanding of the interconnections of the wider context and a unified coherent narrative, based on a stable state of advanced research allowing for a holistic interpretation of the patterns of human-environment interactions at a larger scale.

ICOMOS also considers that the proposed comparative analysis did not allow to contextualise the significance of the Faya Palaeolandscape within the broader framework of early human dispersal out of Africa and climate history in the Arabian Peninsula, whereas this would be essential to understanding its role within larger-scale migratory patterns and environmental adaptation. It further considers that the nomination, as it stands, provides a fragmented and incomplete reading of the landscape, whose significance likely extends to a broader regional scale.

Accordingly, criteria (iii) and (iv) have not been demonstrated, mainly due to the lack of archaeological background sufficient to sustain the claims being advanced, at the level of both the site and the region.

Criterion (iii) cannot be demonstrated, as the documentation of human response to shifting climates cannot be considered a tradition or a civilisation that have disappeared. Additionally, very little is known about the human groups that have inhabited the site, and scientific

evidence is not sufficient to support the claim that they were early modern humans.

Regarding criterion (iv), the nomination does not demonstrate long-term processes associated with behavioural changes demonstrating adaptation rather than temporary human survival in reliance with the features of the site, and does not prove any constructed advanced system for resource management or a complex pattern of spatial organisation.

The provided Palaeolandscape Model reflects environmental facilitation rather than cultural adaptation, suggesting that occupation was intermittent and opportunistic in response to favourable climate condition, indicating reliance on the natural features of the site rather than long-term adaptation supported by behavioural or cultural change. This is supported by Marine Isotope Stage data pointing to gaps in occupation overlapping with hyperarid phases.

ICOMOS further emphasises the need for comprehensive documentation and conservation frameworks. A baseline report for the state of conservation is under development, and in the absence of such a consolidated report, no proper assessment providing a detailed diagnosis of the state of conservation of the different attributes is feasible.

The legal protection of the Faya Palaeolandscape is in place at the national and Emirate levels, encompassing various laws, decrees, and regulations. However, the current legal protection measures do not appear sufficiently effective, given the current state of conservation of the nominated property. The management plan outlines the conservation actions required to address urgent management and conservation challenges. Nevertheless, it should be grounded in the baseline state of conservation report to support well-informed decision-making. Its effectiveness depends on its proper implementation.

ICOMOS considers that this nomination is premature. Without firmly established potential global significance, it is not possible to justify the criteria and therefore, it is not possible to determine with certainty what might constitute the potential Outstanding Universal Value and its supporting attributes, or whether certain attributes would reflect different processes and values. The nomination, therefore, cannot fulfil the requirements set out in the Operational Guidelines for the Implementation of the World Heritage Convention in relation to justifying Outstanding Universal Value.

ICOMOS recognises the potential significance the nominated property may have, given the scientific interest and ongoing research, particularly in the broader context of human migration.

The nominated property also has a paleoenvironmental and archaeological potential in light of the ongoing research and elaboration of a climate history for the Arabian Peninsula at a macro-regional scale. Research projects in Arabia are uncovering new scientific discoveries and

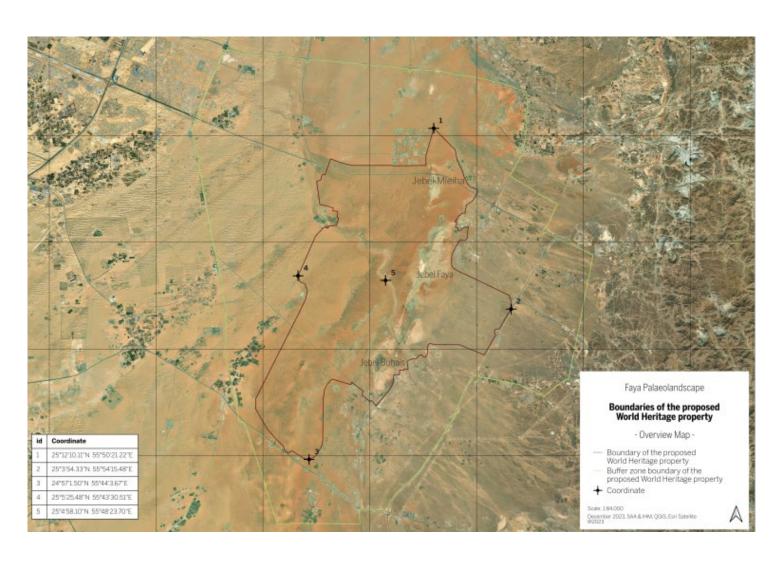
bringing insight into understanding the complex dynamics of the region.

An appropriate nomination strategy might be determined based on research findings, which may involve collaborative efforts with neighbouring countries within the framework of a transboundary nomination dossier.

ICOMOS recommends that, once the state of knowledge becomes conclusive, further research and documentation work could be undertaken to provide a clear assessment of the precise role of the nominated property in, and contribution to, the climate related and human dispersal processes, in comparison with other sites in the wider regional context of human-environment interactions.

7 Recommendations

Recommendations with respect to inscription ICOMOS recommends that the Faya Palaeolandscape, United Arab Emirates, should **not be inscribed** on the World Heritage List.



Map showing the boundaries of the nominated property

III Cultural properties

A Africa

New nomination Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination Nomination deferred by a previous session of the World Heritage Committee

Murujuga Cultural Landscape (Australia) No 1709

1 Basic information

Official name as proposed by the State Party Murujuga Cultural Landscape

Location

Pilbara region Western Australia Australia

Brief description

Murujuga is a landscape of ancient rocks located in northwest Australia, which comprises the Burrup Peninsula as well as the forty-two islands that constitute the Dampier Archipelago and other adjacent marine areas. Its rocky gullies and hills are shaped by the Lore (set of rules and narratives that were put in place to create the Country, which brings together the lands, waterways and seas) and the presence of the Ngarda-Ngarli people, who are the Traditional Owners and Custodians of the site. The nominated property holds deep spiritual and cultural significance, which is translated into tangible and intangible attributes that attest to at least 50,000 years of use and care for the land and seascape by the Ngarda-Ngarli. It is known for its high concentration of petroglyphs, which include unique motifs that showcase artistic originality and technical skill. They provide a visual repository of cultural practices and a record of history through times of environmental and climatic change. The evidence of occupation, petroglyphs, stone structures and rich living cultural practices demonstrate adaptive human use of land and sea.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a site

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

23 January 2020

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 26 August to 4 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the boundaries, the attributes, and the protection, conservation and management of the nominated property.

Additional information was received from the State Party on 6 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the boundaries of the nominated property, the buffer zone and wider setting, the underwater cultural heritage and biodiversity, the tourism strategy, the use of the terms "petroglyphs" and "rock art", and the transmission of knowledge.

Additional information was received from the State Party on 24 February 2025.

Third-party correspondence on the nominated property was received on 25 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

Located in the Pilbara region of Western Australia, the Murujuga Cultural Landscape is a Land and Sea *Ngurra* or *Country* (terms used by the Aboriginal people to describe the lands, waterways and seas to which they are connected), made up of forty-two islands, islets and rocky outcrops ranging from 2 to 3,290 hectares. It includes the Burrup Peninsula as well as the islands that constitute the Dampier Archipelago and other adjacent marine areas. The

term Murujuga means "hip bone sticking out" in Ngarluma, one of the traditional languages spoken at Murujuga. It is today looked after by the Ngarda-Ngarli people, its Traditional Owners and Custodians, who include the Ngarluma, Yindjibarndi, Yaburara, Mardudhunera and Wong-Goo-Tt-Oo groups. They, however, acknowledge that Murujuga was initially the land of the Yaburara people, who lived in the area for at least 50,000 years until the devastating consequences of European settlement decimated their numbers and required the coming together of neighbouring groups to protect the spirit of the place.

Once a prominent geological and cultural landmark on a vast arid plain, Murujuga is now an archipelago considered by the Ngarda-Ngarli as a continuous and significant landscape that records the movements of the ancestral creation spirits as well as the interaction between the landscape and generations of ancestors. The islands that shape this landscape are regarded as both a part of the existing landscape and seascape, and as a remnant of the now submerged ancient landscape, with a direct connection to generations of occupation and cultural sites now hidden beneath the ocean.

Most of the cultural landscape is located underwater today. Through detailed bathymetric mapping of the sea floor, it has been possible for those with the relevant knowledge to identify named places in underwater topographic features. Studies are being undertaken to understand and document the underwater heritage, in particular through the collecting of high-resolution bathymetry data. According to the State Party in its response to the September 2024 ICOMOS information letter, these studies have so far enabled the identification of several significant underwater sites, most specifically Wonky Hole. Cape Bruquieres (considered as the first confirmed underwater Aboriginal site), and Madeleine Shoals. ICOMOS also enquired about the existence of studies regarding underwater biodiversity in its interim report. In its response from February 2025, the State Party explained that the high marine and island terrestrial biodiversity is being monitored via several surveys, as well as through regular land and sea patrols.

The cultural landscape is governed by the *Lore* (rules and narratives put in place for *Country* at creation) and *Law* (Aboriginal practice of cultural law and ceremonial business). It holds several tangible and intangible attributes which are all intricately connected to the history, identity and sacred beliefs of the Ngarda-Ngarli. The tangible attributes include petroglyphs, archaeological sites, and stone structures, as well as important natural features formed by the geology, topography, landforms, waterways and flora and fauna that shape the landscape. The intangible attributes, on the other hand, are linked to the spiritual knowledge and practices of the people. They include stories, songs, systems, spiritual places, language, traditional ecological knowledge and customary management.

The most dominant feature are the petroglyphs. This diverse collection records an extensive memory of secular and sacred activities, including changes in climate and

environment, subsistence activities, social and cultural traditions, ceremonial and ritual behavior and creation cosmogony. They demonstrate diversity in form and style, as well as skill in production and artistic execution. Some of these motifs are distinctly "Murujuga style", evident in their stylised human forms which evidence early, intermediate and recent production styles. For the Ngarda-Ngarli and Aboriginal people across the Pilbara region, the petroglyphs are the work of the *Marrga* (creation spirits), placed in the *Country* as a permanent reminder of the natural order of *Lore*. They are considered to retain the spiritual power of the *Marrga*, and are seen as both significant expressions of ancestral actions and a written history recording the mythological, linguistic, subsistence and ceremonial systems.

In addition, almost 3,000 stone arrangements have been identified within the nominated property, indicating a long history of intense modification of the Murujuga landscape. The arrangements range from single standing stones to hundreds of deliberately placed stones within complex arrangements. Their purpose is diverse, and is likely to reflect multiple functions, from practical activities (shelter, subsistence, resource extraction) to social and sacred behaviours (communication, memorialisation or ritual, and ceremonial symbolism).

The rich intangible heritage within Murujuga reflects the spirituality and world conception of the Ngarda-Ngarli. It is driven by Lore and Law, around which spiritual knowledge and several spiritual practices revolve, which are also depicted in the petroglyphs. Galharra is a kinship system that structures relationships and cultural obligations between people and the natural world, helping individuals understand their roles in the community and ceremonies. Jinna represents a system of songs, dances, and stories that create a geographical map of Country, documenting the creation of the natural world and passing down cultural knowledge. Thalu are sacred sites for rituals that maintain balance in the Galharra system, ensuring the strength of the land, animals, and spiritual elements. The Marrga spirits, along with other creation spirits, are tied to petroglyphs and spiritual places, embodying the connection between the physical and spiritual realms.

Lastly, the Murujuga Cultural Landscape is also valued for its rich biodiversity and ecology, together with the knowledge associated with it, which is held and transmitted through songs and stories.

The nominated property has an area of 99,881 ha, and no buffer zone.

The history and development of Murujuga is the result of a long process which started more than 50,000 years ago, and which consists of several phases testifying to the long and complex history of dramatic environmental, cultural and social changes that characterise the territory.

The narration of the history of Murujuga started when the physical world was created, in *Ngurra Nyujunggamu* ("When the world was soft"). It is at that time that the land,

sea, sky, plants, animals, people and language were put in place and *Lore* was created for *Ngurra* (or *Country*) and everything that lived in it. Back then, the sea level was significantly lower than it is today. A rapid rise in sea levels brought the coastline increasingly closer to Murujuga from around 18,000 years ago, until it reached the outer islands around 9,000 years ago, as the archipelago began to approximate its current form around 4,000 years ago.

The territory was initially occupied by small, highly mobile groups of people, and the population increased as the sea level rose. The first community that occupied the landscape was the Yaburara people.

The 1600s marked the period of the first encounters of explorers from Europe with Murujuga, in particular by Dutch navigators sailing between Holland and the islands of Southeast Asia. The earliest known account of the Murujuga coastline dates back to 1628, with subsequent records by European explorers documenting evidence of occupation across the islands, but no direct contact with the Yaburara people was established until asurvey was carried out in 1818–1822. In the 1840s and 1850s, American whaling vessels operated in the area, and in 1861, British exploration of the northwest part of Australia began, with the Yaburara eventually sharing a base camp in Hearson Cove, after initial strong resistance against the attempt of the crew to take possession of the land.

European colonisation of the region began in 1863 with the establishment of a settlement at Bajinhurrba, followed by the foundation of the town of Roebourne in 1866. This led to extensive land leasing for pastoral stations, causing damage to the land and restricting the access of local Aboriginal communities to resources. Drought, the introduction of livestock, and the start of pearl shell harvesting further compounded the hardships, with the arrival of smallpox devastating Aboriginal populations and intensifying conflict. All this resulted in significant damage to the *Country* and immediate restrictions for local Aboriginal communities, including limited access to *Law* grounds, sacred sites, water, hunting grounds, natural resources, and traditional travel routes.

It later led to increased tensions between Aboriginal people and European trespassers that culminated in a violent punitive campaign by European armed groups against unarmed camps, sparking the Flying Foam massacre, a months-long killing spree that resulted in the deaths of many Ngarda-Ngarli people and marked a turning point in the history of Murujuga.

After this, Yaburara survivors became increasingly displaced by the development of pearling and other industries and became far more migratory, moving frequently between islands of the archipelago and the mainland. Pearl shell collection started at Murujuga during the exploration of Gregory in 1861 and developed into a significant industry by 1865, as colonists exploited the abundant beds at Nickol Bay. In 1869, commercial pearling operations expanded to the Flying Foam Passage, and the industry continued to grow rapidly throughout the 1870s.

This industry led to the forced labour of Ngarda-Ngarli men, women and children. Murujuga was the focus of the pearl shell industry for forty years.

The second half of the 20th century saw industrial mineral extraction, known as the "second wave of colonisation", which further disrupted the landscape and livelihoods of the Ngarda-Ngarli, fragmenting their connection to the land. This era brought significant industrial development, including mines, ports, and infrastructure, leading to the destruction of cultural sites, a sharp increase in the non-Aboriginal population (from just over 3,000 in 1961 to nearly 40,000 by 1976), and the transformation of the Murujuga coastline into an industrial hub, including offshore gas exploitation and ammonium nitrate production.

Following colonisation, the loss of Yaburara knowledge holders and the dispossession of people from the *Country*, parts of Murujuga became what is colloquially referred to by the Ngarda-Ngarli as "orphan *Country*". There were not enough Yaburara people left to care for Murujuga.

In 1993, the Native Title Act was introduced, recognising Aboriginal land rights, and by the early 2000s, three groups made native title claims for Murujuga: Ngarluma-Yindjibarndi, Yaburara-Mardudhunera, and Wong-Goo-Tt-Oo. After overcoming challenges caused by the colonisation, in 2013 the Murujuga Aboriginal Corporation (MAC) gained freehold title of Murujuga, making it the first national park owned by Aboriginal people in Western Australia, with joint management arrangements established in 2022 to protect the heritage and cultural values of the land. Today, the MAC continues to represent Traditional Owners, ensuring the preservation of their cultural connections to Murujuga.

State of conservation

The Murujuga Cultural Landscape is overall in a good state of conservation, with its tangible and intangible attributes reflecting its heritage significance. The Ngarda-Ngarli people have played a crucial role in maintaining this landscape over time through their enduring cultural practices, which include the transmission of knowledge, beliefs, and traditions from their ancestral creator beings. These traditions are passed on through the practice of *Law*, creation stories, language, songs and petroglyphs.

The Law determines how Ngurra (Country) must be cared for and ensures cultural safety in doing so. Annual ceremonies and ongoing cultural education have kept the Traditional Law strong, enabling the Ngarda-Ngarli to share and sustain their knowledge and traditions across generations. This cultural continuity has allowed the Ngarda-Ngarli to manage and protect the Murujuga landscape for tens of thousands of years, even in the face of challenges posed by colonisation and industrial development.

The nominated property has remained largely undeveloped due to a robust legislative and management framework and protective designations, supported by long-standing traditional customary practices as well as governance

arrangements, all outlined in the Murujuga Cultural Management Plan.

The nomination dossier also reports that biodiversity at Murujuga has been well preserved over time. The islands in particular support a high diversity of flora and fauna, some of them being listed as special conservation zones where no public access is allowed. This ensures safe nesting sites for threatened seabirds and marine turtles, offering greater protection to the petroglyphs and cultural features.

A 2022 aerial survey revealed only 0.06 percent of the Murujuga Cultural Landscape has been impacted by land use, while around 15 percent of the Burrup Peninsula has been affected by industrial development since the 1960s.

The petroglyphs, which represent the most numerous features of the site, are also in good condition overall. Over the past twenty years, scientific studies have examined the potential effects of industrial emissions on the chemistry and mineralogy of the petroglyphs. The nomination dossier states that the studies found no scientific evidence of measurable impacts from industrial emissions on the petroglyphs. It explains that the petroglyphs remain largely intact and unaltered, except for a small number relocated due to industrial construction. Approximately 1.800 petroglyphs (less than 0.1 percent) were moved in the 1980s and relocated within the Murujuga National Park in 2014 under the guidance of senior Ngarda-Ngarli to culturally appropriate locations. Additional relocations occurred in 2012, with petroglyphs kept as close as possible to their original sites.

The dossier further states that only a few archaeological sites and petroglyphs have been destroyed or damaged. In 2008, unauthorised mining activity cleared 1.1 hectares within the Dampier Archipelago National Heritage area, likely destroying three undocumented sites. The event prompted an enforceable undertaking under the Environment Protection and Biodiversity Conservation Act (EPBC Act), leading to improved cultural heritage management and a comprehensive inventory of archaeological sites. Large-scale, long-term research has enhanced understanding of the petroglyphs, revealing how the Ngarda-Ngarli adapted their culture, subsistence, social behavior, and *Law* over time.

However, according to several media articles found by ICOMOS, the petroglyphs are under major threats because of the pollution generated by the nearby industries, in particular the production of liquefied natural gas. In the process, acidic and nitrate-rich pollutants are emitted that may accelerate weathering of the petroglyphs, impacting their visibility and stability. The articles point out in particular grave warnings from rock art scientists that Murujuga could be destroyed within a century because of the pollution, and advocate for the stopping of all industrial development at Murujuga.

ICOMOS referred to this in its interim report, and requested the State Party to provide the results of the studies currently being undertaken in this regard. In its response in February 2025, the State Party submitted a draft copy of the Murujuga Rock Art Monitoring Program (MRAMP). The document includes a confidential report which presents the first two years of results of monitoring studies and research being undertaken to establish acceptable and unacceptable air pollutant thresholds to protect Murujuga petroglyphs. As the study is still being undertaken, the final results are yet to be made publicly available. Also attached was a summary from the Western Australia Department of Water and Environmental Regulation (DWER) on the Murujuga Rock Art Strategy, as well as the existing controls, mitigation measures and regulation of industry emissions, along with the framework for future control of industry emissions based on the results of the MRAMP.

Information received by ICOMOS on 25 February 2025 from a third-party organisation reveals that the Australian government is currently considering approval of a major multi-decade extension to Woodside Energy Ltd's Karratha Gas Plant, the single most significant source of these acidic emissions, until at least 2070, and confirms the additional acidic industrial emissions, chemical discharge and transport pollutants that would result from this extension.

According to the third-party information, this would have a significant degrading impact on the integrity of the petroglyphs, to the extent that, if not stopped, they would no longer meet the requirements for World Heritage status. Apparently, regulatory and technological mechanisms would be available to prevent on-site acidic emissions, however these measures do not seem to have been pursued.

The same third-party information reports that, on this matter, five United Nations Special Rapporteurs on human rights, climate change, transnational corporations, cultural rights, the environment and the management of hazardous wastes and substances wrote to the Australian Government in September 2022 to express their concerns about alleged human rights violations due to management of industrial facilities at Burrup Peninsula.

The State Party responded in November 2022 to the United Nations Special Rapporteurs to explain its decision-making process.

Based on the information provided by the State Party, the observations of the ICOMOS technical evaluation mission, the additional information gathered by ICOMOS and provided by the third-party, ICOMOS considers that, although the state of conservation of the nominated property is still satisfactory, the conservation conditions of the petroglyphs are extremely vulnerable and threatened by industrial acidic emissions.

Factors affecting the nominated property

Based on the information provided by the State Party, the observations of the ICOMOS technical evaluation mission, and the additional information gathered and received by ICOMOS, ICOMOS considers that the main factors affecting the nominated property are industrial

acidic emissions, natural weathering, water pollution, invasive species, visitation, and other human activities.

Most of these factors are related to industrial activities. Three Major Hazard Facilities associated with industrial uses are located in the proximity of the proposed boundaries for the nominated property, and the nominated property includes approximately 1,360 hectares of industrial leased land containing cultural attributes. Industrial activities in these areas involve quarrying, moorings, vessel transit, and supporting infrastructure such as roads, power lines, and service corridors.

Industrial activities such as iron ore export, liquefied natural gas production, and renewable hydrogen projects, are regulated by environmental laws, with unused industrial land transferred to the MAC for conservation. Dampier, a major port hub, manages exports under cultural and environmental guidelines, with emergency response plans for maritime risks.

Many industrial operations have restricted Ngarda-Ngarli access to cultural sites and caused some destruction. The nomination dossier however informs that efforts such as employment opportunities, decision-making inclusion, and mapping initiatives help reclaim heritage connections. Vibrations and blasting pose risks to cultural features, while visual and auditory impacts from industrial activities affect the nominated property. Industrial proposals undergo landscape assessments to mitigate visual and cultural impacts.

Severe pollution issues from chemical-producing industries outside the nominated property represent a significant adversely-affecting factor and a major threat against the petroglyphs within the site and their conservation in the next decades. The ongoing monitoring programme (MRAMP), for which the preliminary draft report was submitted by the State Party in February 2025, is expected to determine to what extent the industrial air emissions affect the cultural landscape.

Environmental and biological processes, including microbial activity, can also degrade petroglyphs. Water pollution risks, such as nitrogen emissions causing algal blooms, are addressed through industrial monitoring, while invasive plant species and introduced animals threaten native ecosystems, prompting targeted eradication and restoration efforts by Murujuga rangers. Climate change, coastal processes, tropical cyclones, and wildfires present additional challenges, though the high natural resilience of the region and adaptive management strategies, such as cultural burning and disaster preparedness, help safeguard its cultural and environmental values for future generations.

Lastly, the Murujuga Cultural Landscape is a popular destination for its cultural, spiritual, and natural significance, attracting visitors for recreational activities such as swimming, fishing, and camping. However, unauthorised use, vandalism, and illegal activities, such as graffiti and habitat disturbance, threaten its integrity.

ICOMOS considers that although development pressures, natural disasters, visitation and other human activities are under control through an important set of legislation and management measures, the state of conservation is under major threat due to the particular presence of active polluting industries in the direct vicinity of the nominated property. While taking note of ongoing studies on the impact of industrial air emissions in Murujuga, ICOMOS considers that the state of conservation is extremely vulnerable to industrial pollution; therefore the total removal of degrading acidic emissions caused by industrial processes is necessary to secure the conservation of the petroglyphs. ICOMOS also considers that further industrial development adjacent to, and within, the Murujuga Cultural Landscape, is to be prevented and the development of an appropriate decommissioning and rehabilitation plan for existing industrial activities is to be developed.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The unified tangible and intangible attributes located within the Murujuga Cultural Landscape attest to at least 50,000 years of use and care by the Ngarda-Ngarli people.
- The particularly extensive assemblage of petroglyphs that the Murujuga Cultural Landscape holdscombine artistic originality and technical skills and record the cultural practices and history of the landscape and its people through times of significant climatic and environmental change.
- The living essence of the cultural landscape testifying to deeply rooted cultural traditions, creativity, spirituality and ecological knowledge spanning tens of thousands of years.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: the cultural landscape as a whole, governed by Ngurra (or Country); historic artefacts in the shape of petroglyphs, archaeological sites and stone structures; intangible attributes linked to the spiritual knowledge and practices of the Ngarda-Ngarli and dictated by Law and Lore (including stories, songs, kinship system, spiritual places, language); and the rich biodiversity associated with ecological knowledge.

ICOMOS has observed that the State Party uses the terms "petroglyphs" and "rock art" interchangeably in the nomination dossier. In its interim report in December 2024, ICOMOS asked the State Party if there would be a preferred term for the Ngarda-Ngarli that could be standardised for future publications and signage, and what would be the terms used by Traditional Owners and

Custodians of the nominated property. The State Party replied that it is the preference of the Ngarda-Ngarli that the term "petroglyph" be used. It also specified that there is no direct translation for "petroglyph", nor "rock art".

Comparative analysis

The comparative analysis has been developed around the following parameters: human interaction with the landscape since deep time; a creative and diverse collection of rock art; continuing cultural traditions and living knowledge associated with the rock art; traditional knowledge and use of the land and seascape; and adaptation to significant climatic and landscape changes. It has examined properties within the geocultural context of Australian cultural landscapes and with cultural landscape and rock art properties elsewhere in the world. The properties are inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

The nomination dossier reveals that Murujuga Cultural Landscape shares strong parallels with other Australian Aboriginal cultural landscapes. Seven different cultural landscapes were selected in particular, including cultural landscapes in Australia already on the World Heritage List (Budj Bim Cultural Landscape, 2019, criteria (iii) and (v); Uluru-Kata Tiuta National Park. 1987. 1994. criteria (v). (vi), (vii) and (viii); and Kakadu National Park, 1981, 1987. 1992, criteria (i), (vi), (vii), (ix) and (x)) - as well as sites identified by ICOMOS in its thematic study L'art rupestre: Une étude thématique et critères d'évaluation (Clottes, 2002) and by an Australian rock art thematic study (McDonald and Clayton, 2016) - Kimberley, Quinkan, Greater Sydney Basin, and Western Desert - Jillakurru, Katjarra & Kaalpi. It demonstrates how the connections between petroglyphs and living cultural traditions attest to a representative example of a continuing Aboriginal cultural landscape.

The comparative analysis further highlights the Murujuga Cultural Landscape as an example of a continuing cultural landscape with extensive petroglyphs. It foregrounds similar cultural landscapes worldwide, focusing on those where rock art and living traditions persist, such as Writing-on-Stone/Áísínai'pi (Canada, 2019, criterion (iii)), Matobo Hills (Zimbabwe, 2003, criteria (iii), (v) and (vi)), and Chiribiquete National Park - "The Maloca of the Jaguar" (Colombia, 2018, criteria (iii), (ix) and (x)). These properties share stylistic diversity, cultural continuity, and tangible links to human interaction with the environment. The distinctiveness of Murujuga lies in its deep-time social networks, continuity of petroglyph carving until the late 19th century, which provides an exceptional record of the longevity of this practice (and record of events important to the Indigenous People living in the area), diverse artistic expressions, and ongoing custodianship by Traditional Owners, justifying its nomination as a model for indigenous-led World Heritage inscriptions.

Overall, the comparative analysis provides a detailed and qualitative assessment underscoring that while many other sites in Australia and globally share characteristics with Murujuga, none combine its scale, artistic variety and ongoing cultural relevance. The Murujuga Cultural Landscape stands out as being the only one combining historical human interaction, diverse petroglyphs, living cultural knowledge, traditional land use and climate adaptation.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (i), (iii) and (v).

Criterion (i): represent a masterpiece of human creative genius;

This criterion is justified by the State Party on the grounds that the petroglyphs of the Murujuga Cultural Landscape represent an extraordinary artistic and cultural achievement spanning 50,000 years. This collection of one to two million petroglyphs is one of the densest created by a hunter-gatherer-fisher society in the world. It vividly records secular and sacred activities, cultural traditions, and environmental changes, showcasing diverse artistic styles ranging from naturalism to abstraction.

The petroglyphs include diverse anthropomorphic, therianthropic, and zoomorphic figures, showcasing advanced knowledge of animals and spiritual symbolism, as well as geometric and abstract designs. Some of these motifs are distinctly "Murujuga style", recognisable through their stylised human forms which evidence early, intermediate and recent production styles.

For the Ngarda-Ngarli and Aboriginal people of the Pilbara region, these artworks, created by the *Marrga* ancestral spirits, serve as both spiritual expressions and a permanent cultural record, reflecting mythological, linguistic, and ceremonial systems. The deliberate arrangement of the petroglyphs highlights a deep connection to the landscape, preserving a vast repository of cultural knowledge and creative legacy.

ICOMOS considers that the petroplyphs of the Murujuga Cultural Landscape stand out for their qualities as rock art, including the aesthetic quality of the art, their quantitative dimension, their intrinsic originality and the evidence of a long artistic tradition in that location. All these highlight Murujuga as an exceptional example of human artistic achievement, reflecting the high level of artistic, technical and symbolic endowment of the Ngarda-Ngarli people over time.

ICOMOS considers that this criterion is demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the Murujuga Cultural Landscape is a profound testament to the living cultural traditions and spiritual connection of the Ngarda-Ngarli to their land, a relationship spanning at least 50,000 years. Central to this connection are the concepts of *Lore* and *Law*, which structure the spiritual, social, and cultural framework of Ngarda-Ngarli life. *Lore* encompasses creation stories, ancestral movements, songlines, and the natural order, while *Law* governs men's and women's roles, social obligations, and cultural responsibilities that uphold the balance of *Lore*. Together, these principles shape a rich spiritual worldview, expressed vividly through the remarkable rock art and deep cultural practices embedded in the landscape.

All this is associated with a rich intangible heritage that represents an exceptional testament to Ngarda-Ngarli culture by showcasing the spiritual and cultural systems of *Galharra* and *Jinna*, which define relationships between people, the land, and the spiritual world. Through songlines, dance, and creation stories, these practices create a living map of the landscape while preserving ancestral knowledge and spiritual connections to the land, sea, and natural phenomena. The petroglyphs, with their depictions of sacred laws and spiritual power, serve as permanent reminders of the *Lore* inscribed in the land, while stone structures and *Thalu* (increase sites) reflect adaptive strategies and social organisation, playing key roles in ceremonies that maintain balance and vitality within the natural world.

ICOMOS considers that this interconnected system of stories, rituals, and stewardship make the Murujuga Cultural Landscape a unique and exceptional testimony and enduring symbol of the Ngarda-Ngarli cultural traditions. The stories, resources and spirit of the land are alive and as important to the Ngarda-Ngarli today as they have been for at least 50,000 years.

ICOMOS considers that this criterion is demonstrated.

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that the Murujuga Cultural Landscape is a profound testament to the harmonious interplay between nature and humankind. It has been shaped over at least 50,000 years by the Ngarda-Ngarli people, who consider it both a physical and spiritual connection to their ancestors. This landscape integrates cultural and natural heritage, reflecting creation stories, ecological knowledge, and spiritual practices.

The extensive collection of petroglyphs, alongside other cultural heritage attributes such as the nearly 3,000 stone arrangements, documents the deep interaction of the Ngarda-Ngarli with their environment. These features reflect ecological transitions such as sea level rises that transformed the plains into an archipelago, while also capturing ancestral movements, cosmology, and sacred traditions. The petroglyphs serve as lasting records of the adaptation of the people to environmental changes, and through intangible heritage like songlines (*Jinna*), the kinship system (*Galharra*), and sacred rituals at *Thalu* sites, the Ngarda-Ngarli maintain their connection with the land. These practices preserve ecological and cultural balance, reinforcing the deep relationship between people, *Country* and the spiritual world.

Murujuga is further enriched by its exceptional biodiversity, with over 4,500 marine species, diverse terrestrial plants and animals, and intricate ecological systems that have supported Ngarda-Ngarli subsistence and ceremonial practices for millennia.

ICOMOS considers that by seamlessly integrating all these cultural and natural attributes, Murujuga exceptionally embodies the enduring relationship between the Ngarda-Ngarli people and nature, making it an extraordinary cultural landscape of global significance. It offers a unique case study in human adaptation to ecological transition and environmental stewardship. where sustainable practices of land and sea use are embedded in the physical landscape and cultural expressions of the Ngarda-Ngarli. The long history of adaptation to environmental changes illustrates a balanced. symbiotic relationship with demonstrating the deep and sustainable connection of the Ngarda-Ngarli to their Country.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the main attributes include the traditional system perpetuated by the Ngarda-Ngarli, which governs the cultural landscape as a whole; the petroglyphs, which are central to the continuation of the culture of the Ngarda-Ngarli and are imbued with meaning and associated with spiritual knowledge and practices; cultural artefacts; the archaeological record; and the landscape.

ICOMOS considers that the nominated property meets criteria (i), (iii) and (v).

Integrity and authenticity

Integrity

The nomination dossier demonstrates the integrity of the nominated property on the basis of the following aspects: wholeness; intactness; absence and mitigation of threats; and the protection of the cultural landscape.

The Murujuga Cultural Landscape represents a unique and well-preserved cultural and natural heritage site, showcasing a harmonious relationship between humankind and the environment over 50,000 years. Its integrity is maintained through the preservation of both tangible and intangible elements, including petroglyphs, stone structures, songlines, and cultural traditions, within a delineated boundary that excludes areas impacted by industrial development.

The good condition of its archaeological sites and cultural attributes, along with minimal external damage, highlights the intactness of the landscape.

The dynamic relationships and cultural functions of the Murujuga Cultural Landscape remain vibrant, supported by Ngarda-Ngarli traditions, *Law*, and respect for *Ngurra*. The integration of traditional knowledge into management plans ensures that cultural safety, access protocols, and the interconnected relationships of cultural and natural systems are maintained. This adaptive and culturally informed approach protects the potential Outstanding Universal Value of the landscape while celebrating its significance as an enduring example of human interaction with a dynamic environment. Through the active stewardship of the Ngarda-Ngarli and comprehensive protections, the integrity and cultural vitality of Murujuga are safeguarded for future generations.

However, it is to be noted that although the areas impacted by industrial development have been excluded from the boundaries of the nominated property, their proximity to the site constitutes a threat to its integrity. Certain sites near industrial facilities experience visual impacts and restricted access and the nominated property is extremely vulnerable to industrial pollution. The nomination dossier states that cultural practices and monitoring continue regardless and that World Heritage designation would provide the Ngarda-Ngarli with greater leverage to improve management.

Regarding the cultural features located within the industrial areas, ICOMOS, in its December 2024 interim report, requested further clarification on how the continuity of Murujuga as a cultural landscape is ensured, even without these cultural features being part of the proposed boundaries, and if there is any legal and/or traditional protection in place to ensure that these sites are maintained.

In its response, the State Party explained that although the industrial areas include features that would contribute to the nominated property, the storying and human modification of the industrial areas are not critical to the expression of

the Outstanding Universal Value within the property boundary. It further outlined that parts of the cultural landscape outside the nominated boundary have been excluded due to industrial lease areas with consents, while conservation areas with significant cultural values within those leases have been included. Any activities outside the boundary will require heritage assessments and consultations with Traditional Owners. The State Party also stressed that the Murujuga Aboriginal Corporation (MAC) and its members actively engage in environmental and heritage work outside the nominated boundary, maintaining their traditional rights, while ongoing research may lead to future minor boundary modifications to protect additional areas with potential Outstanding Universal Value.

The petroglyphs reflect the rich artistic traditions of the Ngarda-Ngarli. Their geographical spread and density contribute to a complete and undisturbed cultural landscape that encompasses sacred sites, ceremonial locations and natural features integral to the Ngarda-Ngarli's beliefs and values. ICOMOS, however, considers industrial proximity to remain a major threat to the integrity of the nominated property. It undermines the long-term preservation of its attributes, particularly the petroglyphs, as acidic industrial emissions can lead to their rapid deterioration.

ICOMOS considers that the integrity of the nominated property has been demonstrated but is highly vulnerable due to its direct proximity to industries and exposure to their emissions.

Authenticity

The authenticity of the Murujuga Cultural Landscape is deeply intertwined with the tangible and intangible elements that reflect the traditions, beliefs, and cultural practices of the Ngarda-Ngarli people. This authenticity is evident in the petroglyphs, traditional land and seascape use, and the ongoing cultural practices that embody Aboriginal cultural understandings. These elements, passed down through generations, maintain a deep connection between the people and the environment, ensuring that the landscape remains a living expression of Ngarda-Ngarli heritage and reinforcing the authenticity of Murujuga as a site of deep cultural meaning and continuity.

The authenticity of the landscape is also demonstrated through the continuity of cultural practices, with the Ngarda-Ngarli maintaining traditions such as initiation rites, gender-based access restrictions, and the interpretation of petroglyphs. These practices ensure the transmission of knowledge, *Law*, and spirituality, keeping the cultural landscape vibrant and alive. The connection between people and the landscape is reflected in culturally significant locations, restricted areas tied to identity, and ceremonial practices. Together with ecological diversity, resource management, and the revitalisation of traditional practices, these elements further substantiate the authenticity of Murujuga as an enduring source of spiritual and cultural significance.

The authenticity of the nominated property closely relates to traditional knowledge and its intergenerational transmission. Impacts from colonisation led to the reduction of Yaburara Indigenous People Elders and disrupted traditional knowledge. While much of this knowledge has been revitalised, it remains vulnerable to socio-economic pressures and interruptions, such as the COVID-19 pandemic, which delayed ceremonies and cultural initiations.

In its interim report, ICOMOS asked the State Party if and how the transmission of the Yaburara culture is still ensured from older to younger generations today. The State Party replied that if culture was traditionally transmitted gradually over decades spent with Elders in *Country*, today MAC supports its members with practical initiatives to safeguard the ongoing transmission of language, culture, and land management. Regular meetings, cultural days, culture camps, and visits to significant places are organised between rangers and Elders.

Modern tools like drones and scientific research, used by the Ngarda-Ngarli to care for the land, challenge outdated perceptions of indigeneity but remain guided by traditional knowledge and Elders. The limited number of Elders and the reliance on their involvement in leadership and cultural education further highlight the fragility of these systems.

Despite these threats, the resilience and commitment to cultural education of the Ngarda-Ngarli people, revitalisation of ceremonies, and innovative adaptations strengthen the authenticity of Murujuga. Continued support for Elder-led guidance and cultural transmission is essential to safeguarding this unique cultural landscape.

ICOMOS considers that the authenticity of the nominated property has been demonstrated, although the capacity of the petroglyphs to reflect the proposed Outstanding Universal Value and to activate the Ngarda-Ngarli traditional practices is vulnerable due to exposure to polluting industrial emissions.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met but that they are both highly vulnerable.

Boundaries

Although there are no people living permanently within the proposed boundaries of the nominated property, it is nevertheless located at a short distance from the towns of Dampier and Karratha, which have around 1,060 and 18,750 residents respectively.

The nominated property encompasses 99,881 hectares along the northwest coast of Western Australia, including 8,356 hectares of the Burrup Peninsula, forty-two islands of the Dampier Archipelago, and adjacent marine areas. The area of the nominated property includes the Murujuga National Park, the Dampier Archipelago conservation estate, Western Australian unallocated Crown land and other Crown reserves, local government land, Dampier

Archipelago waters, port lands and waters, industrial leased land, and Department of Defence leased land.

The boundary as proposed in the nomination dossier was defined in early 2007, when a heritage listing decision was deferred until a final boundary was discussed with several stakeholders, including industry partners. The boundary was subsequently revised to exclude several strategic industrial areas. The proposed World Heritage boundary excludes these heavily impacted areas, focusing on protecting cultural features within 930 hectares (0.9 percent) of industrial lease land that remain undisturbed. It is to be noted, however, that there are still some cultural elements related to the Ngarda-Ngarli located within the industrial areas, which are not part of the nominated area.

In addition, the major part of the boundaries of the nominated property as proposed is located underwater. The nomination dossier reveals that although much of the Law associated with the submerged landscape has been lost due to its discontinuation in practice, some of the Jinna songs provide the names of submerged places which are no longer visible in the current landscape. Detailed bathymetric mapping of the seafloor has enabled those with the appropriate knowledge to recognise these named places in underwater topographic features.

In its September 2024 additional information request letter. ICOMOS invited the State Party to provide more clarification on the process that led to the definition of the boundaries as proposed, and to specify on which basis and iustification these limits had been defined. While acknowledging its complexity, the State Party explained in its response that the proposed boundary was carefully developed to reflect its potential Oustanding Universal Value in line with World Heritage guidelines, Traditional Owners' knowledge, stakeholder input, and management needs. It includes lands and seascapes significant to Ngarda-Ngarli traditions, where creation stories, rock art, and cultural practices define the cultural value of the landscape. Areas affected by industrial development, such as ports and gas plants, were excluded to maintain integrity. It further specified that the boundary covers lands managed by the MAC in partnership with the Western Australian Government, with robust legal protections in place. Stakeholder consultation ensured full consent and support for inclusion. Both tangible and intangible cultural features were incorporated to preserve the continuity of the values of the landscape.

ICOMOS also enquired in September 2024 about the named places located underwater, as well as their location. In its response, the State Party confirmed that bathymetric mapping has identified several significant underwater sites within the submerged landscape, and gave details about three specific sites, also providing a map with their location. Flying Foam Passage's Wonky Hole, linked to a *Jinna* over 7,000 years old, and Cape Bruguieres, the first confirmed underwater Aboriginal site in Australia, with over 260 artefacts and stone arrangements, highlight the deep cultural significance of submerged sites, while the underwater features of Madeleine Shoals help identify

Jinna such as the Seven Sisters and the Fish. The State Party added that Ngarda-Ngarli knowledge, combined with bathymetric data, continues to locate and confirm named underwater features that reflect the terrestrial landscape.

ICOMOS also requested if the town of Dampier, which is particularly close to the boundaries, has been subject to any urban planning. The State Party responded that the city is constrained by the City of Karratha Dampier Masterplan as well as the Dampier local planning scheme, which both guarantee that any extension to the town will not affect the boundaries proposed for the nominated property.

In its interim report, ICOMOS requested the State Party to provide an explanation for the rationale for delineating the boundaries in the marine area.

In its response, the State Party explained that this area has been determined on the basis of what was considered the extent of the Murujuga Cultural Landscape prior to inundation. The delineation took into account in particular the inclusion of submerged landscape features with archaeological or cultural value; unexplored features likely tied to the Murujuga landscape; waters used by the Ngarda-Ngarli for connection and resource exploitation; as well as the exclusion of areas impacted by historic dredging or under the Pilbara Ports Authority's jurisdiction for shipping lane management. The proposed boundary was further defined on the basis of traditional language group boundary lines.

Lastly, it is to be noted that no buffer zone has been proposed for the nominated property. According to the State Party, a buffer zone was not necessary because the nominated property is safeguarded through an extensive array of existing protections, which include traditional customary practices as well as national and local legislation, management plans, and strategies providing statutory protection.

In its interim report, ICOMOS requested the State Party to specify how activities in the immediate and wider setting are regulated to ensure the long-term protection of the attributes. In its response, the State Party explained that the Environment Protection and Biodiversity Conservation Act (EPBC Act) requires any action potentially impacting a the values of a World Heritage property, even outside its boundaries, to be referred to the Australian Government Minister for the Environment and Water, acting as a legislative unlimited buffer zone.

It also requested more detail about the mitigation measures in place to control the pollution threat from industries. In its response, the State Party mentioned the Protection of the Sea (Prevention of Pollution from Ships) Act 1983, the primary Australian Government legislation that gives effect to the International Convention for the Prevention of Pollution from Ships (MARPOL). It shared a full list of Australian Government legislation giving effect to MARPOL. The State Party informed that emissions can also be considered through the EPBC 1999 Act referrals process.

ICOMOS considers that legal systems such as the EPBC Act are not enough to ensure the sustainable protection of the cultural attributes located within the industrial areas in the absence of a buffer zone, particularly with regard to the information provided by the third party organisation concerning the approval of the multi-decade extension of Woodside Energy Ltd's gas plant in Karratha.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers the property to be a cultural landscape whose exceptional value lies in the traditional system governing it, which manifests itself through cultural artefacts, particularly the petroglyphs, and through an important set of spiritual knowledge and practices which perpetuate its meaning and significance. It has perpetuated through time thanks to the active care of the Ngarda-Ngarli. The comparative analysis justifies consideration of this property for the World Heritage List; the property meeting criteria (i), (iii) and (v). The conditions of integrity and authenticity of the nominated property have been met, but both are vulnerable due to industrial emissions, considered the major adversely affecting factor for the petroglyphs. The absence of a buffer zone remains a cause of concern for ICOMOS, in particular with regards to maintaining, and even expanding, the industrial activities.

4 Conservation measures and monitoring

Documentation

Early archaeological surveys, which were first developed in the 1960s, documented significant sites, such as the 1968 recording of 572 locations by Robert Bednarik and the 1980-1981 Dampier Archaeological Project, which recorded 720 sites, though many were lost to industrial activity. Many other surveys have been developed within the nominated property since then, including ethnographic, heritage, biodiversity or human-use surveys. To these must also be added a broad range of records, inventories and archives for the nominated property. These documents are held within the following institutions: the Murujuga Aboriginal Corporation (MAC); Australian Government (Department of Climate Change, Energy, the Environment and Water); the Western Australian Government (Department of Biodiversity, Conservation and Attractions); the Department of Water and Environmental Regulation; and the Department of Planning, Lands and Heritage.

The nomination dossier also provides a very detailed bibliography compiling existing publications related to the Murujuga Cultural Landscape and associated topics.

Conservation measures

The undertaking of inventories, recording, and research has been instrumental in implementing conservation measures within the Murujuga Cultural Landscape.

These research and documentation efforts have enhanced cultural heritage management, providing a shared

understanding of the rich history of Murujuga and facilitating its preservation. However, concerns remain about the disproportionate focus on tangible attributes, such as petroglyphs, over endangered Indigenous knowledge and practices. To address this, the MAC is strengthening its leadership in research partnerships, emphasising cultural components and training for its members. Increased resources, including an expanded ranger program and educational initiatives for Ngarda-Ngarli youth, are recommended to ensure the continuation of cultural heritage alongside environmental conservation in this extraordinary cultural landscape.

Monitoring

The monitoring is ensured by a comprehensive set of customary and legislative protective measures, supported by a robust governance framework led by the MAC, which integrates traditional knowledge and cultural heritage with modern management practices.

The MAC, representing five Aboriginal groups, is central to this structure, integrating traditional knowledge into management practices. MAC co-manages the Murujuga National Park and Dampier Archipelago with the Department of Biodiversity, Conservation and Attractions (DBCA) of Western Australia, ensuring both cultural and natural values are protected. The Murujuga Circle of Elders provides crucial cultural guidance, working with Murujuga rangers to uphold traditional *Lore*. The Murujuga Park Council, comprising MAC, DBCA, and other stakeholders, advises on conservation and policy, aligning activities with cultural and environmental objectives.

Monitoring the state of conservation and the effectiveness of management plans and mitigation strategies are both integral to the Murujuga Cultural Landscape Strategic Management Framework, which ensures a coordinated and property-wide approach to monitoring and reporting. An evaluation and monitoring regime is in place, with the results of monitoring regularly reviewed, evaluated, and used to inform management decisions as part of the adaptive management cycle, and guide future improvements in monitoring. The MAC, the Western Australian and Australian governments regularly report on the monitoring programs, with information published on their respective websites. The monitoring programs and key indicators are regularly reviewed to ensure that best practice methodologies and techniques are being implemented, that monitoring programs are effectively and efficiently monitoring relevant key indicators for measuring the state of conservation of the Murujuga Cultural Landscape, and that no redundant information is being collected.

The nomination dossier provides a table with key indicators for measuring the state of conservation of the nominated property, specifying the monitoring periodicity as well as the location of records. The indicators are grouped around the following categories: cultural heritage; resource extraction and industrial development; continuation of Ngarda-Ngarli *Lore* and culture; industrial air emissions; water; flora; fauna; climate change; large-scale wildfires; and tourism.

ICOMOS considers that conservation and monitoring are ensured thanks to a comprehensive set of measures combining both customary and legislative tools, under the participatory supervision of the MAC.

ICOMOS considers that it would be advisable that the monitoring system be adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The Murujuga Cultural Landscape comprises national park and nature reserves, unallocated Western Australian Crown land, leasehold and freehold land, each managed under different statutory and management frameworks. The Australian and Western Australian governments, in partnership with the MAC and landowners, ensure a unified and collaborative management approach across the nominated property, guided by the Murujuga Cultural Landscape Strategic Management Framework.

The protection of Murujuga relies on a complex interplay of Australian and Western Australian legislation. At the federal level, the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is crucial, protecting nationally significant heritage and requiring impact assessments for potentially harmful actions. The Aboriginal and Torres Strait Islander Heritage Protection Act 1984 offers additional protection for cultural sites, though rarely used due to state-level equivalents. The Underwater Cultural Heritage Act 2018 safeguards underwater cultural heritage, and shipping pollution is regulated by the Protection of the Sea (Prevention of Pollution from Ships) Act 1983 and the Navigation Act 2012.

The framework of Western Australia includes the Land Administration Act 1997 for Crown land management and reserve creation. The Aboriginal Cultural Heritage Act 2021 is key, empowering Traditional Owners in protecting their cultural heritage. The Environmental Protection Act 1986 focuses on pollution control and environmental impact assessments. The Biodiversity Conservation Act 2016 addresses biodiversity protection and customary activities. The Mining Act 1978 regulates mining, with exemptions for areas like Murujuga. The Conservation and Land Management Act 1984 governs conservation reserves and joint management. The Planning and Development Act 2005 guides land use planning. The Port Authorities Act 1999 governs port operations, and the Fish Resources Management Act 1994 regulates fisheries. Specific industrial projects are often governed by individual State Agreement Acts.

Finally, the Local Government Act 1995 empowers local governments in areas like town planning, development approvals, public health, and licensing, adding another layer of local oversight to the management and protection of Murujuga.

In its interim report, ICOMOS asked the State Party whether any other legal or management document would allow it to ensure that the underwater cultural heritage and biodiversity are properly preserved. The State Party replied that the Dampier Archipelago island reserves draft joint management plan outlines strategies to protect the natural and cultural values of both the terrestrial and adjacent marine areas of the Murujuga Cultural Landscape, focusing conservation, impact reduction, knowledge enhancement, monitoring, and improved management. Other documents include the Australian Government's Underwater Cultural Heritage Act 2018, the Western Australian Aboriginal Heritage Act 1972, as well as the EPBC Act.

Management system

The Murujuga Cultural Landscape is managed and protected through a comprehensive system that combines traditional Aboriginal knowledge and practices with Australian and Western Australian legislation, joint management agreements, plans, policies, strategies, and programs.

All of these elements are integrated within the Murujuga Cultural Landscape Strategic Management Framework, reflecting the Aboriginal philosophy of Ngaayintharri Gumawarni Ngurrangga ("We all come together for Country"). This framework provides overarching guidance for the protection, management, and monitoring of the landscape, ensuring alignment with existing legal and governance structures and fulfilling Australia's World Heritage Convention obligations. Its core objectives are to protect and present the potential Outstanding Universal Value of the area, integrate this protection into planning, engage the community, promote understanding and respect through education, inform the public about the condition of the area, and implement necessary measures to achieve these goals. Supported by both Australian and Western Australian governments, the framework will be in place for ten years, with a review after seven years to assess progress, incorporate new information, and adjust objectives and strategies as needed. According to the nomination dossier, several risk management strategies and management plans are in place to mitigate impacts and ensure preparedness for natural disasters.

The management of Murujuga is characterised by a collaborative, indigenous-led approach, with the MAC playing a key role in overseeing the site. The involvement of MAC ensures that traditional Ngarda-Ngarli practices and values are integrated into the management and decision-making processes, maintaining the authenticity and cultural relevance of the nominated property. Efforts are underway to establish a cooperative management agreement placing the MAC at the centre of decision-making for sustainable economic partnerships and funding for adjacent industrial land. Although industrial areas within the nominated property are all managed under cultural heritage plans and the EPBC Act, they remain a major concern.

The Murujuga rangers, guided by the Circle of Elders and Murujuga Park Council, manage the conservation estate alongside the Western Australian DBCA. Their duties include visitor impact monitoring, infrastructure maintenance, and conservation programs, ensuring that traditional knowledge remains integral to the management and protection of the area.

This framework ensures coordinated monitoring and protection of the landscape, combining Indigenous knowledge with technical expertise in biodiversity and conservation. Significant initiatives, such as the Cultural Heritage Management System, facilitate documentation and intergenerational transfer of cultural knowledge, while the Murujuga Rock Art Strategy and Murujuga Rock Art Monitoring Program evaluate petroglyphs for resilience to environmental changes, finding no significant damage to date. Additionally, the Deep History of Sea Country: Climate, Sea Level and Culture project explores submerged landscapes and oral histories, uncovering evidence of early human occupation.

Should Murujuga achieve World Heritage status, additional protections will be implemented, guided by international best practices. A key development will be the establishment of a Murujuga Cultural Landscape World Heritage Advisory Committee, incorporating local, cultural, and scientific expertise to further strengthen governance and safeguard the Outstanding Universal Value of the nominated property.

While the framework is comprehensive, continuous engagement among all stakeholders is crucial to adapting management practices as needed, particularly in response to industrial and environmental challenges.

Visitor management

The management of Murujuga balances cultural heritage, natural beauty, and recreation, recognising increasing which necessitates careful planning. Inappropriate tourist behaviour and even minor infractions can negatively impact the landscape, so visitor education is prioritised through guided tours and interpretive materials. Commercial tourism is permitted but carefully managed through licensing to ensure cultural appropriateness and ecological sustainability. Financial sustainability is ensured through funding from both Australian and Western Australian governments, supporting initiatives like the Murujuga Ranger Program. Most importantly, Ngarda-Ngarli traditional practices and ongoing connection to the land are central to all management decisions, with partnerships embodying the philosophy of "We all come together for Country." Designated visitor areas are being developed to accommodate increased tourism while protecting sensitive sites.

In its response to the September 2024 ICOMOS additional information letter, the State Party provided more detail about the tourism strategy within the nominated property. It explained in particular that tourism at Murujuga is being carefully managed, with assessments of visitor numbers and the development of a Tourism Precinct. This Precinct, crucial for handling increased visitation, will feature a Living

Knowledge Centre for cultural education. An Interpretive Masterplan and trail network are in development. A partnership with the City of Karratha is funding and constructing the access road. Planning is well advanced, with technical studies and designs completed, and a business case under review.

In its interim report, ICOMOS enquired about the possibility for the State Party to share the schematic design for the Tourism Precinct, and requested if a Heritage Impact Assessment (HIA) was conducted for this project. ICOMOS also requested to receive the Recreation Master Plan developed for the Murujuga National Park as well as the jointly managed islands of the Dampier Archipelago. The State Party provided both documents. It also specified that the Murujuga access road and the Living Knowledge Centre will go through Western Australian and Australian Government environmental and heritage approvals, including a HIA once the final design schematics are approved.

Community involvement

The Murujuga World Heritage nomination process was Indigenous People-led. It involved extensive consultation beyond the Ngarda-Ngarli cultural leadership. Government and non-government stakeholders, interest groups, and the local community were engaged through various means, including public meetings, newsletters, and social media. Targeted meetings were held with residents, tourism operators, and industry. An Interagency Taskforce, including Australian and Western Australian government agencies and the MAC, provided technical input. Upon inscription, a property-specific advisory committee will be established to advise ministers on protection and management, promote the values of the site, and enhance community stewardship.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the property is managed through an extensive set of management and legislative measures effective at traditional, local, regional and national levels. However, the absence of a buffer zone remains a disadvantage in terms of management with regard to the industrial activities. Continuous engagement among all stakeholders remains crucial to adapting management practices as needed, particularly in response to industrial and environmental challenges. In addition, efforts are being made as regards the management of visitors, which must be pursued while being subject to relevant HIAs.

6 Conclusion

The Murujuga Cultural Landscape, located in northwest Australia, includes the Burrup Peninsula, the Dampier Archipelago, and adjacent marine areas. It holds deep spiritual and cultural significance for the Ngarda-Ngarli people, who have cared for the land and seascape for at least 50,000 years and who are the initiators of this nomination. Through the seamless integration of cultural and natural attributes imbued with spiritual meanings and deep history thanks to an interconnected system of stories, rituals, and stewardship, Murujuga exceptionally embodies the enduring relationship between the Ngarda-Ngarli and nature, and their cultural traditions, making it an extraordinary cultural landscape of global significance. The Ngarda-Ngarli traditional system governs and shapes the cultural landscape as Country. It combines places and cultural artifacts with spiritual knowledge and practices. The main tangible representation of the latter is the dense concentration of petroglyphs which, with their unique motifs and expression of technical skill, serve as a rich visual record of cultural practices and historical changes in response to environmental shifts in deep time.

The joint effort of the State Party and the Ngarda-Ngarli to nominate the Murujuga Cultural Landscape to the World Heritage List is to be praised. The nomination dossier is of great quality and sensitivity, and demonstrates the active involvement and contribution of the Indigenous People and all actors involved in championing this nomination. There is an evident commitment to the conservation of this nominated property by the State Party and the Ngarda-Ngarli, who have ensured, in an exemplary way, its preservation for thousands of years. ICOMOS also appreciated the commitment of the State Party in providing comprehensive additional information.

ICOMOS considers that the nominated property has the potential to be inscribed on the World Heritage List, according to criteria (i), (iii) and (v). The petroglyphs, the living cultural traditions and spiritual connection of the Ngarda-Ngarli to their land through a relationship spanning at least 50,000 years, and the harmonious interplay between nature and humankind, all contribute to the intrinsic exceptional quality of the property, demonstrated through a meaningful and detailed comparative analysis. The authenticity and integrity of Murujuga Cultural Landscape are upheld through the continuity of Ngarda-Ngarli traditions, sacred sites, and ecological stewardship and the still vibrant dynamic relationships and cultural functions of the landscape.

However, the presence and intensive activity of several industries in the vicinity of the nominated property remains an utmost concern for ICOMOS. Pollution from these industries, particularly from acidic emissions, puts the petroglyphs under serious threat and makes the integrity and the authenticity of key attributes of the nominated property highly vulnerable. ICOMOS notes with appreciation the current ongoing studies to assess the actual impact of these industries on the petroglyphs and on the property at large. It also noted the important set of

measures combining both customary and legislative tools under the participatory supervision of the Murujuga Aboriginal Corporation. However, these, together with the absence of an actual buffer zone for the nominated property and the recent information received regarding the approval of the multi-decade extension of Woodside Energy Ltd's gas plant in Karratha, constitute several important aspects that require further action by the State Party.

It is urgent that the State Party ensures the total removal of degrading acidic emissions, currently impacting upon the petroglyphs of the Murujuga Cultural Landscape, to maintain the long-term integrity of the site and the values for which the nomination is taking place. The State Party must also prevent further industrial development adjacent to, and within, the Murujuga Cultural Landscape and develop an appropriate decommissioning and rehabilitation plan for existing industrial activities, as required.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of the Murujuga Cultural Landscape, Australia, be **referred back** to the State Party in order to allow it to:

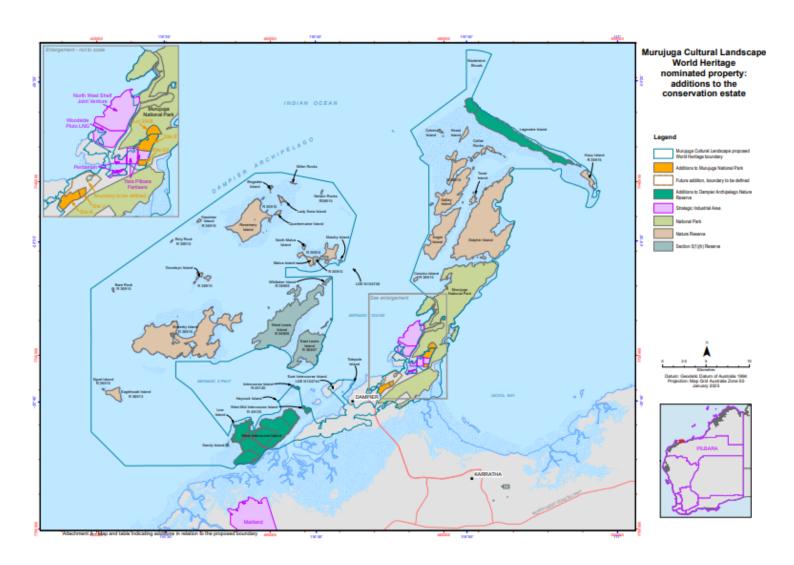
- Finalise the ongoing studies on the impact of the industries on the petroglyphs and on the nominated property,
- Ensure the total removal of degrading acidic emissions, currently impacting upon the petroglyphs of the Murujuga Cultural Landscape,
- Prevent any further industrial development adjacent to, and within, the Murujuga Cultural Landscape,
- Develop an appropriate decommissioning and rehabilitation plan for existing industrial activities, as required,
- Establish strengthened protection measures, subject to the free, prior and informed consent of, and developed in close consultation with, the Ngarda-Ngarli, ensuring the application of the precautionary principle.
- Establish the Murujuga Cultural Landscape World Heritage Advisory Committee, incorporating local, cultural and scientific expertise to further strengthen governance and safeguard the proposed Outstanding Universal Value of the nominated property;

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

 Undertaking measures to ensure that interlinked cultural and natural values are fully protected, both in the terrestrial and the marine areas,

- b) Undertaking measures to ensure that both cultural and natural values, and the impacts from the port and industries on the marine and terrestrial cultural artefacts and biodiversity are regularly monitored,
- c) Continuing the research and studies underway on the underwater feature of the nominated property,
- d) Informing the World Heritage Centre of the intention to undertake or authorise all major projects which may affect the proposed Outstanding Universal Value of the nominated property, in line with paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention,
- e) Developing and implementing a Heritage Impact Assessment for development proposals, such as the Tourism Precinct.



Revised map showing the boundaries of the nominated property (February 2025)

Cambodian Memorial Sites (Cambodia) No 1748

1 Basic information

Official name as proposed by the State Party

Cambodian Memorial Sites: From centres of repression to places of peace and reflection

Location

Kampong Chhnang Province Kampong Speu Province Phnom Penh Cambodia

Brief description

The Cambodian Memorial Sites are comprised of three component parts which portray the abuses of human rights by the Khmer Rouge regime between 1971 and 1979. In April 1975, the Khmer Rouge occupied the capital and rapidly established a nation-wide security system to repress opposition and impose a new social order on the Cambodian people. This was a system of immense violence, torture and execution that impacted the lives of every Cambodian. The serial nomination of three sites demonstrates this widespread experience. The former M-13 prison site is associated with the initial phase of the repression and violence; and the two other sites are the former S-21 interrogation prison (Tuol Sleng Genocide Museum) and its associated execution site (Choeung Ek Genocidal Center). From the earliest phases following the Khmer Rouge period, these sites have been memorialised and conserved. Following the end of the Khmer Rouge period, the Extraordinary Chambers in the Courts of Cambodia (ECCC) documented these traumatic experiences. The Tuol Sleng Genocide Museum maintains an extensive archive of records and other collections.

Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of three *sites*.

In terms of the Guiding Principles for the preparation of nominations concerning sites of memory associated with recent conflicts (Guiding Principles) (2023), it has also been nominated as a site of memory associated with recent conflicts.

Included in the Tentative List

27 March 2020 as "Former M-13 Prison/Tuol Sleng Genocide Museum (former S-21)/Choeung Ek Genocidal Center (former Execution Site of S-21)"

Background

This is a new nomination.

The World Heritage Committee adopted the *Guiding Principles* at its 18th Extraordinary Session (2023, 18 EXT.COM 4). These have been applied to the evaluation of this nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 16 to 23 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the boundaries and buffer zones, legal protection, conservation and archaeological heritage management, planned and approved development projects, management coordination, updated actions, as well as community and stakeholder involvement.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: boundaries and buffer zones, legal protection, the conservation of paper documents and museum objects, urban development pressures, the notion of "living archaeological site", the management of the Choeung Ek Genocidal Center, the future vision for the former M-13 prison, Heritage Impact Assessment, the interpretation plan, and sand dredging.

Additional information was received from the State Party on 26 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

In the instability following the second Vietnam War, civil war occurred in Cambodia between Lon Nol of the Khmer Republic and the Communist Party of Kampuchea, known

as the Khmer Rouge, led by Pol Pot. The Khmer Rouge gradually took control of Cambodia from 1971. In April 1975 they occupied Phnom Penh, instituting a radical ideology and a nation-wide system of repression of unimaginable cruelty and violence against Cambodian people until 1979.

The Khmer Rouge imposed a radical revolution oriented at the Maoist-inspired "super great leap forward" that involved forced population movement, forced labour, abolishing money and religion, restructuring of family life, and targeting of particular populations including former Khmer Republic officials, members of the Cham and ethnic Vietnamese Cambodian minorities, monks and nuns, and "intellectuals" broadly speaking. Within a period of a few days, the entire population of Phnom Penh (around two million people) was displaced to the countryside.

The individual known as "Duch" (Kaing Guek Eav) was one of the key people that implemented the ideology of the regime and is a link between the three nominated component parts. He was appointed Deputy Chair in charge of interrogations when S-21 prison became operational in October 1975, and in March 1976 was promoted to Chairman and Secretary. He personally oversaw the interrogation of prisoners at S-21. However, at an earlier stage, the Khmer Rouge established prisons to punish "enemies of the revolution". At the M-13 prison, he and his staff developed interrogation techniques that were later used at S-21. Every person that was taken to the S-21 prison was destined for execution. Duch was also responsible for selecting the execution site.

During the reign of the Khmer Rouge, between 1.5 and 2.2 million people, equivalent to between a fourth and a third of the population, died. Around half of those who died succumbed to starvation, malnutrition, lack of medical care and disease, and the other half were killed violently, in what is known internationally as "the killing fields". These were grave violations and crimes against humanity.

In January 1979, the Khmer Rouge were ousted from Phnom Penh by a combination of Vietnamese and dissident Cambodian forces, although they remained in control of some parts of the country during the 1980s. At that time, the United Nation General Assembly accorded the credentials to represent Cambodia to the remaining Khmer Rouge rather than to the Phnom Penh based government, as the latter was dismissed as a puppet of Vietnam

During the 1980s, some of the remaining Khmer Rouge leaders questioned the veracity of the accounts of the S-21 prison. However, academic research and the legal investigations by the Extraordinary Chambers in the Courts of Cambodia (ECCC) confirmed these accounts.

The conflict has been studied with increasing intensity since the 1990s, particularly in relation to two of the nominated component parts, the Tuol Sleng Genocide Museum (former S-21 prison) and the Choeung Ek Genocidal Center (former execution site of S-21). The ECCC were established through an agreement between the United

Nations and the Cambodian government and contributed significantly to knowledge on the conflict. It examined two cases, producing evidence of atrocities.

This nomination does not represent the entirety of the Khmer Rouge conflict, since many Cambodians suffered from famine and hardship. However, it is intended to demonstrate the repressive security system that was brutally implemented during this period.

This is a serial nomination of three component parts that represent the historical narrative from the beginning of the crime to the detention and mass killing. All three sites are associated with the figure of Duch. Two of the sites (former S-21 prison and its execution site) represent the peak of the repression and violence, and the third site (M-13 prison) is an earlier site, that demonstrates the beginnings of the "security system" and its methods.

Component part A: Former M-13 prison

This site is located in the rural countryside approximately ninety kilometres northwest of Phnom Penh, on the banks of a small river. In 1971, during the civil war, this area was taken by the Khmer Rouge, and the M-13 prison operated here between 1973 and 1975. It is now seen as an experimental site that foreshadowed the atrocities that occurred at the other component parts. Following revisions to the boundaries submitted in the additional information of February 2025, the State Party has confirmed the area of 1.4 hectares for this component part.

Prisoners were detained and interrogated in pits covered by roofs made of natural vegetation. Accommodation, offices and cooking facilities were constructed of bamboo and other perishable materials, leaving few above-ground remains. However, the depressions and mounds in the landscape indicate their former locations, and these have been confirmed by archaeological investigations and guidance from informants, including pits for interrogation and detention (some iron shackles remain *in situ*), several mass graves, guard tower and several kitchens and other structures. Some artefacts and human remains have been recovered at the site

The site was acquired by the government in 2019 and is managed by the Tuol Sleng Genocide Museum. It is likely that more features exist and will be revealed by planned ground penetrating radar studies. Currently the detention pits have been covered with soil and are marked by a temporary bamboo structure.

The M-13 prison is associated with the early development of the regime of repression and violence of the Khmer Rouge. It is considered to be the site where Duch (who later headed the S-21 Prison) developed his interrogation and torture techniques.

Compared to the other two component parts, the research, management and protection for this site are rather recent and still in their infancy. In the additional information received in November 2024, the State Party indicated that

component part A is being proposed as a living archaeological site, which means that there will be ongoing archaeological investigations alongside memorialisation and visitor management. Commemoration events have recently begun, and the State Party advised that an existing natural mound will be developed as a focus for future ceremonies.

Component part B: Tuol Sleng Genocide Museum (former S-21 prison)

The Tuol Sleng Genocide Museum was established in 1979 on the site of the former S-21 Prison. This component part of 1.17 hectare is located in the city centre of Phnom Penh and was a high school prior to the Khmer Rouge occupation of the capital.

The site was preserved immediately following the end of the Khmer Rouge occupation of Phnom Penh on 7 January 1979, keeping intact the buildings and cells for mass and individual detention and interrogation. The Museum also contains an extensive archive of more than 766,000 pages of documents, as well as artefacts and some human remains (which have been brought to the museum from other mass graves). There are ongoing projects related to documentation and curation at the museum.

The buildings of the former high school were adapted to the purposes of detention and torture. The complex is made of four three-storey buildings with a single storey timber and concrete office building. There is at least one mass grave known to be at the site, although its location has not been determined. Since the original S-21 was much bigger than the present site, the location of the mass graves might be under buildings in the buffer zone. For the most part, prisoners were transported to Choeung Ek for execution, although some detainees were killed at the prison, particularly in the early periods.

The site is enclosed by walls and barbed-wire fencing, and the former entrance gate. There is some preserved graffiti that has been inventoried. The first courtyard includes the tombs of the last fourteen victims killed at S-21, a sculpture entitled "For those who are no longer here", and a memorial established in 2015 as a nonjudicial reparation project from the ECCC's case 001 (in which Duch was convicted for his crimes at S-21). The monument is surrounded by marble steles that have the names of approximately 12,000 known victims.

The S-21 prison was much larger than the current museum site. When people returned to Phnom Penh in 1979, the area became rapidly urbanised.

Component part C: Choeung Ek Genocidal Center (former execution site of S-21)

The Choeung Ek Genocidal Center is located within the Phnom Penh municipal area, approximately fifteen kilometres from the capital. Since 1981, this site has been responsible for the preservation of the mass graves holding the remains of the estimated 18,063 S-21 prisoners who

were brought here to be executed between 1976 and 1979. Prisoners were brought to this site from Tuol Sleng by truck and were executed at night according to different methods. The site was identified by villagers immediately after the Khmer Rouge regime was overthrown and soon afterwards some 129 pits were identified. Following revisions to the boundaries submitted in February 2025, the State Party has confirmed the area of 1.33 hectares for this component part.

A tall stupa was constructed in the centre of the site in 1988 to house human remains (mostly skulls and long bones) recovered from the site. The State Party estimates that 8,985 persons were exhumed from 86 out of the 129 graves, and other human remains have been collected from the ground surface. There are a number of mass graves that are visible on the site, protected by fences, shelters and wooden walking platforms. Many of these have not been exhumed, and human remains and other materials can be seen in the ground surface. There are several other elements that reflect the atrocities committed at this site, including an execution tree (used to kill children), and a "music tree". Visitors leave small bracelets and other objects on or near these trees. The locations of various sheds and other structures have also been identified through oral testimony and archaeological survey.

There is an older Chinese cemetery on the site, and a concrete gazebo associated with this former use still stands (the location of graves is not known). The documentation of this component part is held in the Tuol Sleng Genocide Museum.

The site is a significant focus for memorialisation throughout the year, but especially on Remembrance Day (20 May), *Pchum Ben* (Ancestors Day, September) and Khmer New Year (April).

In the additional information received in November 2024, the State Party advised that a Cambodian legacy institute for peace and remembrance will be established following the completion of the judicial functions of the ECCC. The Tuol Sleng Genocide Museum and Choeung Ek Genocidal Center are playing a key role in the planning for this initiative.

Based on the additional information of February 2025, the area of the three component parts totalled 3.9 ha, with buffer zones totalling 21.22 ha.

State of conservation

For component part A, the proposed attributes consist of below-ground archaeological sites and materials that are still being researched and identified. These are vulnerable to flooding and natural processes of deterioration. The historic dimensions of the interrogation pit have not yet been determined. In the additional information received in November 2024, the State Party confirmed that the detention pits have been stabilised to maintain their shape. There are current proposals to re-open the trenches and use them for display and education, which could possibly increase the risks to these features. Such

changes will potentially require the establishment of a roof/cover and flood barriers to protect the excavated pits. Proposals are under consideration to install some markers or other mechanisms to prevent further filling and loss of visibility of this feature. ICOMOS considers that the proposed attributes are fragile and that the conservation treatments being considered for component part A are technically complex. These should be the subject of rigorous Heritage Impact Assessment processes.

For component part B, the buildings, collections and exhibitions have been subject to condition assessments that underpin the setting of priorities for conservation work. The buildings are generally in sound condition and require maintenance, and many *in situ* elements and collections have complex conservation needs (including for example, the gates and barbed wire fence, and the graffiti found throughout the site, which are vulnerable). An overall maintenance plan for the site is recommended. The diversity and fragility of the proposed attributes and associated materials in the archive and museum collections pose serious and ongoing conservation and storage challenges.

For component part C, the state of conservation of the landscape elements is generally good, although it is vulnerable when rainy weather occurs. The Phnom Penh Municipality created a dam around the site in 2000 to protect the mass graves from flooding.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is generally good, although each component part is vulnerable due to different pressures.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property vary across the three component parts and include urban development, tourism development, natural deterioration of significant materials, and flooding.

The State Party acknowledges that all three component parts are under strong development pressure due to urbanisation and infrastructure projects, and that changes in the settings are likely, especially for component part C.

Regarding component part A, the additional information received in November 2024 confirms that the State Party recently halted sand mining nearby, and agricultural activity is considered to be a medium risk. In the additional information of February 2025, the State Party outlined the legal frameworks for sand dredging, and advised that the relevant Ministry is active in prohibiting illegal activities. It is not clear whether future sand dredging would be permitted in the wider setting of this component part.

The site is potentially susceptible to flooding, with mud filling the depressions and pits. Flood control measures are planned to minimise this risk. Since the submission of the nomination, fencing has been installed, a vehicle access road has been built, along with a car park and a wooden footbridge to cross the stream to access the site. A permanent bridge to access the site is planned to be constructed in 2025. Installation of a small solar energy station and re-installation of a traditional water wheel for irrigation purposes are also under consideration. Minimal memorialisation and interpretation (a memorial plague, a small shelter and amenity block, signage, first aid station, rest benches), as well as further archaeological research will be preceded by Heritage Impact Assessments. There are currently no buildings in the buffer zone and the area is covered with plantations.

Regarding component part B, the primary factors that could impact on the museum site are related to the proximity of urban development. The State Party is considering changes to the traffic management arrangements to reduce congestion near the entrance.

Regarding component part C, there are some impacts from a nearby garbage deposit and factory, and rapid urbanisation poses a potential threat to the ambience of the site (including land reclamation of wetland areas for new residential and commercial developments). Flooding is a potential threat to the pits and mass graves during heavy rain periods. Flood control measures have been constructed to mitigate these possible sources of threat. In the additional information received in November 2024, the State Party has indicated that the roofing over the three largest mass graves is currently being replaced with more permanent wood material resistant to termites. Stabilisation of the perimeters of the other individual graves is planned. Demarcation of the nominated property is proposed by extending the low-level hedges.

ICOMOS considers that the state of conservation is generally good, although vulnerable due to a range of factors affecting the nominated property, including urban development, flooding, natural deterioration and development of tourism infrastructure. Sand dredging should be prohibited within the wider setting of component part A.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

 The Cambodian Memorial Sites are evidence of the Khmer Rouge regime which perpetrated one of the most serious abuses of human rights in the period 1971-1979 through a repressive system of imprisonment, interrogation, torture and execution.

- The three component parts illustrate the essential stages of the Khmer Rouge security system and represent hundreds of such centres and execution sites throughout Cambodia.
- The Khmer Rouge regime impacted every aspect of Cambodian life through imprisonment, transfers and forced labour, and resulted in the death of one quarter to one third of the population of Cambodia.
- The nominated sites have become places of memory and memorialisation and demonstrate the movement from repression to peace and reflection.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: all tangible features and materials associated with the Khmer Rouge period (including buried and exhumed human remains) and memorialisation elements and uses.

Comparative analysis

The comparative analysis has been developed around the themes of prison systems, war and conflict, and genocide. It has examined properties throughout the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties as well as other properties.

In the global comparative analysis, the State Party has considered nine sites, including the following World Heritage properties: ESMA Museum and Site of Memory - Former Clandestine Centre of Detention, Torture, and Extermination (Argentina, 2023, (vi)); Australian Convict Sites (Australia, 2010, (iv) and (vi)); Funeral and Memorial Sites of the First World War (Western Front) (Belgium and France, 2023, (iii), (iv) and (vi)); Hiroshima Peace Memorial (Genbaku Dome) (Japan, 1996, (vi)); Auschwitz Birkenau German Nazi Concentration and Extermination Camp (Poland, 1979, (vi)); Sites Mémoriaux du génocide: Nyamata, Murambi, Bisesero et Gisozi (Rwanda, 2023, (vi)); and Robben Island (South Africa, 1999, (iii) and (vi)). Other sites discussed are: Stasi Prison Berlin-Hohenschön-hausen (Germany) and Centro Nacional Chega/Balide-Comarca Prison 1974-1999 (Timor-Leste).

While additional sites associated with losses through wars in the region could be mentioned, ICOMOS considers that the focus of the comparative analysis on 20th century genocides is appropriate. There are no doubts about the scale and significance of the nominated property, and as the *Guiding Principles* emphasise, there is no single site that can represent mass crimes worldwide.

The State Party has compared the selected component parts with 196 known prison/security centre sites and 81 memorials to the victims of the genocide within Cambodia. The parameters used are the following: evidence of their role in the Khmer Rouge security system (including execution sites), and evidence of their current use as a place of memorialisation and education. The State Party has used several in-depth sources of documentation about these sites, including the cases of the Extraordinary Chambers in the Courts of Cambodia (ECCC), Cambodian Genocide Project "Mapping

Reports" with updates from the Documentation Centre of Cambodia, the "Mapping Memories Cambodia Project", and various dissertations and academic materials.

From the larger total, fifteen sites were considered by the State Party to be worthy of further analysis. The State Party has explained its reasons why twelve of these were not selected for the serial nomination.

Within this comparative analysis, ICOMOS notes that the ECCC found that S-21 and Choeung Ek stood out amongst all security centres through their intimate and direct connection to the central Khmer Rouge leadership and policy. The S-21 prison was "an organ" of the Communist Party of Kampuchea, had national reach, and was the centre to which high level prisoners would be taken. Duch reported directly to the highest echelon rather than to a regional or less senior leader. Thus, the presentation of S-21 and Choeung Ek as outstanding within a broader system of security centres is in accordance with the legal findings of ECCC. The State Party explains that Choeung Ek cannot be understood without S-21 and S-21 cannot be understood without Choeung Ek, the most well-known "killing fields" of Cambodia.

The justification for the inclusion of component part A as part of the serial nomination is less obvious. It has only recently been identified as a place for visitation and memorialisation, and plans for its protection, research, and curation have just begun. There are fewer tangible attributes of the conflict. The arguments for inclusion of component part A depend to an extent on the associations with Duch, as an early experimental site for his methods. However, ICOMOS considers that claims that the three properties represent "stages" of the system is compelling. ICOMOS supports the inclusion of this component part, and considers that the rationale for the selection of the serial nomination is appropriate.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of cultural criterion (vi).

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the basis of the associations between the three component parts and the events of the repressive Khmer Rouge system, characterised by imprisonment, interrogations, torture and executions, as well as the subsequent memorialisation of these events. Each of these component parts have tangible and intangible links with the events of the genocide, and were managed directly by one perpetrator, Kaing Guek Eav (Duch), a senior leader of the Khmer Rouge.

ICOMOS considers that the events in question for this nomination are of universal significance. The violence of the regime and its intention to remove all internal and external enemies involved arresting, interrogating, torturing and executing many Cambodians and constitutes one of the most egregious human rights violations of the 20th century. The Khmer Rouge conflict and its victims have been commemorated at these and other places since the regime was ousted from Phnom Penh in January 1979.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the attributes of the nominated property include all tangible features and materials associated with the Khmer Rouge period (including buried and exhumed human remains, and archaeological evidence of former structures) and memorialisation stupas, elements and uses. These have been clearly identified by the State Party.

ICOMOS considers that the nominated property meets criterion (vi).

Integrity and authenticity

Integrity

The integrity of the nominated serial property is based on the rationale for the selection of the component parts, the ability of the component parts to convey the proposed Outstanding Universal Value of the nominated property, the state of conservation, the way major pressures are managed, and the intactness of the material evidence of the selected component parts.

ICOMOS considers that the serial approach is justified, and the attributes necessary to demonstrate the proposed Outstanding Universal Value have been identified. The boundaries are satisfactory, although they are relatively tightly drawn and do not anticipate the possibility of discovering additional attributes (such as mass graves) in the wider setting (particularly in component part A, which is at an early stage of research). The nominated component parts have a satisfactory state of conservation, although they are vulnerable. The State Party has identified these pressures, and the Comprehensive Cultural Management Plan (CCMP) has outlined appropriate responses.

ICOMOS considers that the integrity of the whole nominated series and of each of the component parts has been demonstrated.

Authenticity

The above and below ground attributes of the nominated component parts, together with the associated collections and archives, demonstrate a high degree of authenticity. The authenticity of the nominated serial property is supported by the extensive physical, written and oral information about the Khmer Rouge security system,

including video and photographic materials. The Tuol Sleng Genocide Museum Archives has been included in the UNESCO Memory of the World International Register, and there are extensive judicial records of the international ECCC.

ICOMOS considers that the authenticity of the whole nominated series and of each of the component parts has been demonstrated.

In conclusion, ICOMOS considers that the conditions of authenticity and integrity of the nominated series and of each of the component parts have been met.

Boundaries

The State Party provided clarifications and revisions to the buffer zones in the additional information received in November 2024 and February 2025. These boundaries are formally established for the three component parts through the Royal Decree that was finalised in February 2025.

For component part A, the boundaries reflect the core area of the former prison, located alongside a small river. There is a narrow buffer zone that includes the recently constructed access road. Land uses in the buffer zone are limited to agricultural activities and light constructions. ICOMOS notes that some areas that the State Party indicated as possible locations of mass graves are not located within the property boundaries, and suggested to extend them to include these areas. In the additional information received in February 2025, the State Party indicated that it did not wish to change the boundaries because the presence and location of these possible mass graves is not known at this stage. ICOMOS considers that if future discoveries determine the location of mass graves in the buffer zone, the boundaries (and buffer zone) should be revised via a minor boundary modification request outlined in paragraphs 163-164 of the Operational Guidelines for the Implementation of the World Heritage Convention.

For component part B, the boundaries are clearly established by the extent of the museum which is now surrounded by urban development. The component part was made into a museum in 1979, immediately following the return of the population to Phnom Penh. Because executions occurred within and around the buffer zone before the establishment of component part C for executions, the wider setting may contain evidence of the former prison. The list of attributes includes at least one possible mass grave behind the museum buildings, but its location is not known. The State Party has addressed this issue through the development of the Master Plan for the Phnom Penh Municipality that creates a "third satellite zone" beyond the buffer zone. Height controls and other regulations are in place for the buffer zone and wider setting, although this does not directly provide protection to graves or other sub-surface materials associated with the operations of S-21. While all sub-surface archaeological sites and materials are protected by the national law, a more direct linkage with development approval regulations would strengthen the protection.

For component part C, the buffer zone initially presented in the nomination dossier did not entirely enclose the boundaries of the component part. In the additional information of February 2025, the State Party provided revised maps showing extension of the buffer zone on its north and west sides, including the southeast corner. ICOMOS considers that these extensions will provide strengthened protection from future development pressures and include the car parking area adjacent to the entry gate. However, at the same time, the State Party also reduced the boundaries of the component part, excluding areas within the perimeter that were not directly associated with the "killing fields" (but including the site management structures and visitor facilities). ICOMOS considers that this creates a very tight delineation for the component part itself, and will rely substantially on effective management of the buffer zone to ensure that this highly sensitive place of memorialisation is appropriately protected.

The State Party advised that there are no inhabitants within any of the nominated component parts. All are in government ownership. There are no inhabitants in the buffer zones for component parts A and C, and 2,820 inhabitants in the buffer zone for component part B.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies the consideration of the property for inscription in the World Heritage List. Criterion (vi) has been demonstrated and the requirements for integrity and authenticity have been met. The boundaries and buffer zones are satisfactory, although they are tightly drawn and may need revision in light of future discoveries of mass graves or other sub-surface cultural material associated with the Khmer Rouge regime.

4 Conservation measures and monitoring

Documentation

Although survey work is ongoing (particularly for component part A), ICOMOS considers that the tangible attributes of the nominated component parts are appropriately documented. In the additional information received in November 2024, the State Party advised that an overall GIS-based management system is planned and will be developed within the Korea International Cooperation Agency and UNESCO grant programme (KOICA/UNESCO).

Regarding component part A, the additional information received in November 2024 explained that archaeological investigations at M-13 have been conducted since 2019 involving surface collection and survey. Excavations and ground penetrating radar surveys were undertaken in May 2023 in conjunction with Flinders University (Australia). All records of these studies are lodged physically and

digitally with the Tuol Sleng Genocide Museum. ICOMOS recommends the development of a research plan for the nominated property.

The Tuol Sleng Genocide Museum has an archive of more than 700,000 pages, and an Archive Unit responsible for continuing documentation and care for this collection. The archive was inscribed in the UNESCO Memory of the World International Register in 2009. An archive management system was introduced in 2023, and the UNESCO Tuol Sleng Genocide Museum Archive Preservation and Digitization project (2018-2021) digitised more than 300,000 pages, and catalogued and indexed the collection. The museum also holds an extensive and extremely significant collection of objects. ICOMOS considers that the Tuol Sleng Genocide Museum has done a commendable job in supporting research, training the conservation teams, and in the creation of educational programmes.

Conservation measures

At Tuol Sleng, there is an archive office, and a specially controlled archival room located on the second floor of Building C for the extensive documentary collections (paper and photographs). The artefacts (objects, tools, textiles) are well documented and displayed. However, ICOMOS notes that two storage spaces for the artefacts under the staircase on the ground floor of Building B (for clothes) and Building C (for metal) are rudimentary and should be improved in order to conserve these artefacts.

In the additional information received in November 2024 and February 2025, the State Party advised that condition assessment and conservation works at component parts B and C are planned as part of the KOICA/UNESCO programme.

The treatment of human remains is a sensitive and significant issue. The Cambodian government has determined that retrieved human remains are kept and conserved as evidence of the crimes committed by the Khmer Rouge. Human remains and other artefacts may resurface not only in the nominated property and buffer zones but also in other places in Cambodia. There are national laws in place for these finds, which are strengthened by the religious and cultural beliefs of the Cambodian people.

There are *in situ* human remains at each of the component parts (and in the collections held and displayed at component parts B and C). Guided by international protocols for Mass Grave Protection, there are procedures in place for the treatment of newly discovered human remains. Nevertheless, the conservation of human remains is highlighted by the State Party as a current challenge. Displayed human remains are exposed to sunlight and are not kept in conditions where light, temperature and humidity are controlled. ICOMOS recommends that the conservation of materials be improved through capacity building and better storage at the Tuol Sleng Genocide Museum, and that sustainable resourcing for the ongoing conservation of all materials in the museum collection should be provided.

Monitoring

Monitoring measures are outlined in the nomination dossier and in the Comprehensive Cultural Management Plan (CCMP), including the state of conservation of the tangible attributes, and the ability to identify trends in pressures affecting the three component parts. The responsibilities for monitoring and the periodicity are briefly identified. Monitoring data is provided to the Coordinating Committee.

ICOMOS considers that the State Party should be commended for the documentation that has been done and has provided some recommendations to further strengthen and improve the standard of conservation of the museum collections, including a research plan for the sites and collections. The monitoring system is adequate and will be further supported once the proposed GIS-based management system is in place. ICOMOS considers that it would be advisable that the monitoring system is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The nominated component parts are owned by the Royal Government of Cambodia and are protected by a series of Royal Decrees, laws and regulations. All three component parts are protected through their inclusion in the official inventory of state property. Sites associated with the atrocities of the Khmer Rouge regime were immediately protected by Cambodia. Component part B was protected from 1979, under the supervision of the Department of Crime Research and Conservation. Decrees in 1983 and 1985 created protection for natural and cultural heritage, including sites of former prisons and camps. Following the adoption of a new Constitution in 1993, the Ministry of Culture and Fine Arts was established, and the Law on Protection of Cultural Heritage was adopted in 1996. This is the primary legal mechanism for the protection of the nominated property as cultural heritage. It is further supported by the Law on the Prevention of Denial of Crimes Committed during the Period of Democratic Kampuchea (2013).

In the additional information received in February 2025, the State Party advised that the Royal Decree on Designating the Cambodian Memorial Sites had been signed by the King, and is now in force. It formalises the boundaries and buffer zones and sets out the high level governance arrangements for the protection of the three component parts. The operationalisation of protection is dependent on the finalisation of the relevant Master Plans for the Phnom Penh Municipality and Kampong Chhnang Province. The State Party has advised that the Master Plans on Land Use Designation and regulations regarding component parts B and C are in the final stages of approval. ICOMOS considers that all of these plans should be completed as a priority.

In the additional information, the State Party also advised that for component part A, the Kampong Chhnang Provincial government provided official land titles to the Ministry of Culture and Fine Arts for all but one remaining land parcel. This process was expected to be completed by March 2025.

The buffer zones are regulated by the municipal provisions of land management and city planning. The buffer zone for component part B has three zones with different height controls and limits on the types of businesses that are closest to the site.

Heritage Impact Assessment (HIA) is implemented for changes to the nominated property, although this is dependent on provisions for controlling development and archaeological activity in existing national and municipal regulations. In the additional information provided in November 2024, the State Party advised that an overarching HIA policy document will be developed for the nominated property.

ICOMOS notes that the legal protection is supported by Cambodian religious and traditional beliefs and practices.

Management system

The Ministry of Culture and Fine Arts is responsible for the protection of cultural heritage in Cambodia, including sites associated with the Khmer Rouge genocide. The Tuol Sleng Genocide Museum is directly responsible for the management of component parts A and B. Component part C is under control of the Phnom Penh Municipality, which contracted with the JC Royal Company for the daily operation of the site as a tourism destination.

An Inter-Ministerial Committee was established in July 2023 to ensure the coordinated protection and management of the nominated component parts. The Director of the Tuol Sleng Genocide Museum is the Coordinating Officer responsible for the oversight of management, conservation and interpretation of the three component parts. The State Party has mentioned the establishment of a Coordinating Committee for Cambodian Memorial Sites, although little detail is provided. ICOMOS recommends that the State Party should give consideration to the establishment of a coordinating office or other structure managed directly by the Ministry of Culture and Fine Arts.

The Comprehensive Cultural Management Plan (CCMP) was submitted with the nomination dossier, and includes guidelines and plans for each component part, including conservation, visitor management, interpretation, monitoring and treatment of human remains. Updates to the actions were provided in the additional information of November 2024. A number of the key actions for conservation, interpretation and management will be facilitated by the grant from the KOICA/UNESCO programme for the period 2024-2028.

Component parts A and C do not have individual management plans, although master plans are envisaged for them.

Component part B has a strategic plan 2021-2025 which was developed through participatory methods. It includes a detailed risk mapping which identifies priorities for maintenance and repairs. Several projects based on the risk mapping have been initiated such as the eradication of bats in several buildings, termite control, and ground penetrating radar documentation of an area with possible burials. A risk assessment has also been prepared for the extensive collections.

Visitor ticket sales support the resourcing for component parts B and C, but this is unlikely to be the case for component part A in the near future.

Visitor management

The three component parts currently experience different levels and types of visitation. Two of them (component parts B and C) are heavily visited destinations for tourism and are extremely significant visited by Cambodian people.

Currently component part A is not accessible for visitors, but the State Party intends to open the site and to develop visitor facilities for it. In the additional information provided in November 2024, the State Party reported that an access road had been constructed since the submission of the nomination dossier. A master plan for this site is yet to be prepared, but the actions are likely to include: installation of a boundary fence, appointment of security staff, tree planting, visitor facilities, and the establishment of a community museum or visitor centre. The State Party has indicated that visitor facilities will be located outside the boundaries of the component part.

Component part B has operated as a site of memory and education of the Khmer Rouge conflict since shortly after it was discovered in January 1979. It is one of the most visited places in Phnom Penh by tourists and received 500,000 visitors in 2019. There are exhibitions throughout the buildings, audio guides are available in a number of languages, and there are many interpretation signs both in Cambodian and English. There are traffic congestion issues in the area around the museum, and the State Party has indicated that it may consider establishing a cap on the number of visitors and developing alternative circuits in the Tourism Management Plan. Some modest tourism infrastructure buildings have been constructed (for ticketing and toilets).

Component part C also receives a very high number of visitors (more than 250,000 prior to the COVID-19 period). Some raised wooden walkways have been installed to protect areas where human remains are likely to occur. Like component part B, the Choeung Ek site has long operated as a site associated with traditions of memorialisation. There is an audio tour available in multiple languages. In the buffer zone, there is a small museum, a car park and modest tourism infrastructure

buildings (for ticketing, toilets, refreshments, souvenirs). Future plans for this site include further excavations, space for Muslim worship, tree planting, , and new toilets.

An extensive educational outreach programme is offered to Cambodian students at component part B. Interpretation at both component parts B and C frames the conflict as a source of lessons to be learned for the promotion of peace and reconciliation. At component part B the public is also informed on the evolution of reconciliation and how commemorations of the conflict have evolved since 1979 to more nuanced approaches. The Lotus room, located at the end of the tour, has been designed as a space for contemplation and reflection.

The interpretation of component part A has yet to be developed. The additional information provided by the State Party describes some future plans. Because of the fragility and less accessible location of this site, ICOMOS suggests that there is a need for a different approach to its interpretation (compared to the other component parts). In the first instance, it is important to include interpretation of this site in the programmes already presented at component parts B and C, so that there is an overarching narrative for the nominated property. Although a list of actions has been provided for component part A, the master plan should include the identification of a clear vision for the future memorialisation and tourism uses of this site.

ICOMOS considers that a coordinated interpretation plan is needed, that would provide a coherent narrative that spans all component parts, and that would specify the commemorative, educational and ceremonial activities that teach prevention lessons and promote reconciliation and peace.

Community involvement

Today, there are few survivors still alive, but the families of victims are very involved in the commemoration and educational activities of each of the nominated component parts.

For component part A, the lands surrounding the site are used for farming, grazing and fishing by the local village. The State Party has made efforts to involve these communities in decision-making, and in activities like archaeological excavations. There have been education programmes for local students, and a religious ceremony held for the victims at the completion of the archaeological excavations.

Brief information has been provided about the involvement of communities associated with component parts B and C. The State Party notes that these sites have been developed as sites of memory for many years, and there is a high level of awareness about their operations. ICOMOS notes the strong support by surrounding communities for the nomination.

ICOMOS considers that the State Party could provide enhanced opportunities for community involvement in the

management system, including people that live in the buffer zones and wider settings of the component parts.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection is sufficient but needs to be augmented by the completion of the relevant master plans as a priority. There is also an urgent need to establish the practical operations of the coordinated management mechanism, and to incorporate the requirements for HIA into the legal framework. The management system is adequate, and a number of key actions will be advanced by the recently agreed KOICA/UNESCO grant programme. ICOMOS has provided some additional recommendations about the further development of interpretation, sustainable tourism planning and community involvement in the ongoing management of the nominated property.

6 Conclusion

The Cambodian Memorial Sites: From centres of repression to places of peace and reflection are a serial nomination of three component parts that portray the abuses of human rights by the Khmer Rouge regime between 1971 and 1979. From 1971, the Khmer Rouge developed the characteristics of their security system of repression that were fully implemented from April 1975 when the Khmer Rouge occupied the capital and rapidly displaced its population into the countryside in order to impose a new social order. This system of immense violence, torture and execution impacted the lives of every Cambodian, and more than a quarter of the population perished.

ICOMOS considers that these events are of universal significance. Many Cambodians died of hunger and disease during this period, and many others died through the implementation of the repressive and violent security system of the Khmer Rouge. Their intention was to remove all internal and external enemies by arresting, interrogating, torturing and killing many Cambodians at places such as those represented by this nomination. This was one of the most egregious human rights violations of the 20th century, and the victims have been commemorated at these and other places since the regime was ousted from Phnom Penh in January 1979.

ICOMOS considers that the nominated serial property demonstrates criterion (vi). The conditions of integrity and authenticity have been met. The boundaries and buffer zones for all three component parts are satisfactory, but are tightly drawn and may need to be adjusted in the future in light of new archaeological discoveries, through a minor boundary modification request. The state of conservation of the attributes of the nominated serial property is vulnerable to natural deterioration, weather events, urban and tourism development, and visitor pressures. The three component parts are well-documented, although ICOMOS notes that the

investigation and uses of the site of the former M-13 prison are still in their infancy. ICOMOS recommends that the vision for this site and strategic planning for its further development be undertaken, accompanied by further archaeological investigations (including non-intrusive methods) and rigorous Heritage Impact Assessments (HIA) of all changes and developments.

ICOMOS considers that the legal protection of the three component parts is adequate, although the operationalisation of the protection via the relevant provincial/municipal master plans should be completed as a priority. HIA are in place for the nominated property, but the State Party is currently considering how best to incorporate this more formally in its legal frameworks. A Comprehensive Cultural Management Plan is in place, with a range of relevant actions. The management system is adequate, and key actions will be advanced by the recently established KOICA/UNESCO grant programme.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Cambodian Memorial Sites: From centres of repression to places of peace and reflection, Cambodia, be inscribed on the World Heritage List on the basis of **criterion** (vi).

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Cambodian Memorial Sites are testimony to one of the most serious abuses of human rights in the 20th century. Between 1971 and 1979, the Khmer Rouge regime established a nation-wide security system in order to repress political opponents and impose a classless agrarian society of collective farming. The network of security centres and execution sites throughout Cambodia touched every aspect of Cambodian life through imprisonment, forced transfers and labour, and denial of the necessities of life. In a single decade, one quarter of the population perished.

This serial property of three component parts illustrates the stages of the Khmer Rouge security system. The former M-13 prison (component part A) shows the initial phase during the civil war period, a prototype for subsequent developments. The centrally located former S-21 prison, now Tuol Sleng Genocide Museum, (component part B) in Phnom Penh represents the apex of the system; and its associated execution site, now Choeung Ek Genocidal Center (component part C) reveals its final elimination stage. These three sites represent the full scope of the repressive system of imprisonment, interrogation, torture and execution.

Following the defeat of the Khmer Rouge regime, the Cambodian Memorial Sites became places of memorialisation to honour victims. As places of reflection

and learning, the serial property encourages peaceful coexistence among peoples and fosters a commitment to never repeat such atrocities. The property provides an example of the ongoing process of navigating the joint goals of justice and national reconciliation.

Criterion (vi): The Cambodian Memorial Sites demonstrate the events of the Khmer Rouge repressive system of imprisonment, interrogation, torture and execution known internationally as the "killing fields". The scale and impact of these events and the impacts on the people of Cambodia are of outstanding universal significance. The three component parts were all managed directly by one man (Kaing Guek Eav, known as Duch) accountable to the senior leadership of the Khmer Rouge. All have direct tangible and intangible links with these events through their tangible attributes, documentary evidence and witness accounts.

Integrity

The serial property includes all the attributes necessary to convey the Outstanding Universal Value, and to support the continuing processes of memorialisation. The boundaries of the component parts are satisfactory but are tightly drawn, possibly requiring future revision in light of new discoveries. The component parts have a satisfactory state of conservation, although they are vulnerable due to natural processes, visitor pressures, and urban development.

Authenticity

The serial property is associated with tangible evidence, written and oral information sources that provide insight into the Khmer Rouge security system. The above and below ground attributes of the component parts, together with the associated collections and archives demonstrate the authenticity of the serial property in relation to its Outstanding Universal Value. These information sources are relatively more abundant for the former S-21 prison and execution grounds (component parts B and C) than for the former M-13 prison (component part A). The material evidence of the physical attributes has been well documented using maps, photographs, archaeological investigations, exhumation of human remains and witness accounts. The Tuol Sleng Genocide Museum Archives, included in the UNESCO Memory of World International Register, are a rich resource for understanding these events and their tragic outcomes. In addition, the judicial records of the international Extraordinary Chambers in the Courts of Cambodia (ECCC) support the authenticity of these sites.

Protection and management requirements

The three component parts are all owned by the Royal Government of Cambodia: two by the Ministry of Culture and Fine Arts (A and B) and one by the Phnom Penh Municipality (C). The Phnom Penh Municipality has given a contract to the JC Royal Company to provide the daily operations of the Choeung Ek Genocidal Center (C) as a tourism destination (until 2035).

The property is protected under several Royal Decrees, laws and regulations. Protection is operationalised by the relevant municipal/provincial master plans which require urgent development and finalisation.

A coordinated management mechanism for the property has been established by Royal Decree via an Inter-Ministerial Committee responsible for implementing the protection and management strategies across the three component parts. The Director of the Tuol Sleng Genocide Museum is the overall Coordinating Officer, mandated to oversee the management, conservation, interpretation and other matters related to the property.

The Comprehensive Cultural Management Plan covers conservation of all attributes, visitor and property management, interpretation, protection and appropriate treatment of human remains for each component part. It also addresses the site-specific conservation requirements and regulation of their respective buffer zones. Many of the key actions will be facilitated by the grant from the Korea International Cooperation Agency and UNESCO (KOICA/UNESCO) for the period 2024-2028.

The three component parts have different levels and types of visitation. Two of them (B and C) are heavily visited destinations for tourism and are significant sites of memory visited by Cambodian people. Currently component part A is not accessible for visitors and memorial activities have recently begun. Careful strategic planning for this component part is required, accompanied by rigorous Heritage Impact Assessments. A masterplan for this site will be prepared.

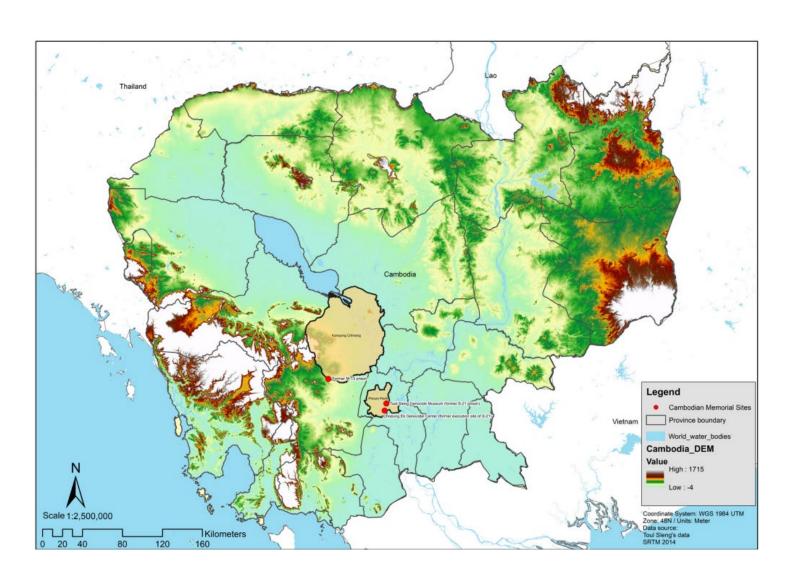
There are few survivors of the Khmer Rouge regime still alive, but the families of victims are involved in the commemoration and educational activities of each of the component parts. The Tuol Sleng Genocide Museum has an extensive educational outreach programme for Cambodian students. There are further opportunities for community involvement in the management system.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Establishing the practical operations of the planned coordinated management mechanism for the property as a priority, and considering the establishment of a coordinating office or other structure managed by the Ministry of Culture and Fine Arts,
- b) Developing and finalising as a priority the Master Plan for the Kampong Chhnang Province that ensures the regulation and protection of the buffer zone for component part A, and the Master Plans on Land Use Designation for component parts B and C.

- c) Developing an overarching interpretation plan for the property that brings together the overall story presented by the component parts (initially at least, this should be presented at component parts B and C).
- d) Completing the planned overarching Heritage Impact Assessment policy document for the property and considering the most effective means of embedding this mechanism in the legal framework; also ensuring that rigorous Heritage Impact Assessments are applied to all new developments in all three component parts,
- e) Developing an overarching research plan for the property,
- f) Developing a sustainable tourism plan for the property, including the integrated visitor itineraries that encompass all the component parts, along with a code of conduct for respectful visitation,
- g) Expand the opportunities for the involvement of local communities living and working around each of the component parts in the management of the property,
- Ensuring that sand dredging is prohibited in the wider setting of component part A, and implementing flood control measures to prevent damage to the attributes,
- Undertaking non-invasive research to determine the location of mass grave(s) at component parts A and B, and developing policies for how any future discoveries will be handled. Revision of boundaries and/or buffer zones through a minor boundary modification request should be considered if discoveries outside the current delineations of the property occur,
- j) Developing a comprehensive maintenance plan for component part B,
- k) Strengthening the protection of future discoveries of sub-surface archaeological sites and materials (including graves and human remains) by linking them to the development approval regulations for the buffer zone and wider setting of component part B,
- Developing and implementing capacity and the needed ongoing resources to improve the standards of material conservation and storage of artefacts, documents and objects held by the Tuol Sleng Genocide Museum, including human remains,
- m) Developing master plans for component parts A and C; and including in the master plan for component part A, a clear vision for its interpretation that takes into account its rural location and fragile tangible remains.



Map showing the location of the nominated component parts

Xixia Imperial Tombs (China) No 1736

1 Basic information

Official name as proposed by the State Party Xixia Imperial Tombs

Location

Xixia District Yinchuan City Ningxia Hui Autonomous Region China

Brief description

The nominated property is a necropolis located in the foothills of the southern Helan Mountains, in what is now the Ningxia Hui Autonomous Region. It is the imperial cemetery of the emperors of the Xixia Dynasty, comprising nine imperial mausoleums, 271 subordinate tombs, a northern architectural complex and thirty-two flood control works. This archaeological burial site bears witness to the religious and socio-political history of the Xixia Empire, which lasted over ten imperial reigns, from the 11th century to the 13th century, until it was destroyed by the Mongol army of Genghis Khan in 1227. Founded in 1032 by the Tanguts, nomadic herdspeople who settled in what is now Ningxia Hui, the empire was inhabited, in addition to the Tanguts, by Han Chinese, Tibetans, Uighurs, Khitans and Jurchens. On the Silk Road, the Xixia Empire was crossed by merchants, caravans, monks and nomads, and developed a multicultural civilisation based on the Chinese imperial model, of which Buddhism was an essential part.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

Included in the Tentative List

29 January 2013 as the "Western Xia Imperial Tombs"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 10 August to 16 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about religious beliefs, the boundaries of the nominated property, conservation and management, protection, management and interpretation.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: integrity and authenticity, conservation measures, the risk management plan, the tourism strategy and the local communities.

Additional information was received from the State Party on 27 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report 12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property is a necropolis containing the remains of nine imperial mausoleums, said to be those of seven Xixia emperors, and those of the father and grandfather of Emperor Li Yuanhao (1038-1048), founder of the Xixia Dynasty (1038-1227). The necropolis also includes 271 subordinate tombs, a northern architectural complex and thirty-two flood control works, dikes and open drains.

Located in the foothills of the Helan Mountains, a mountain range marking the western boundary between the Gobi Desert and the floodplain of Ningxia, which drains into the Yellow River, the necropolis extends over a gently sloping, rocky plain, cut into by gullies and sparsely vegetated. The necropolis and its imperial mausoleums are distributed from south-west to north-east alongside the Helan Mountains, which form a broad landscape setting.

Each of the nine imperial tombs has its own unique characteristics, with the exception of twin tombs 1 and 2. A general spatial organisation can nevertheless be discerned: an imperial tomb occupies an area of eight to sixteen hectares and is contained within a first rectangular enclosure, flanked by triple towers. The entrance to the funerary complex is marked, to the south, by two *Que*

towers. On each side of the south-north composition axis, the two stele pavilions, arranged symmetrically on either side of this axis, were built in this first enclosure. A third pavilion is sometimes placed to the south of the eastern pavilion. A gate with triple towers gives access to a secondary, rectangular enclosure, the axis of which is marked by a short alignment of two rows of statues. Abutting this enclosure to the north, lies the main enclosure, flanked by towers with gates on all four sides. The southern gate is formed of a central pavilion, also flanked by towers.

In the south-west quarter of this enclosure lies a sacrificial hall; extending away from this is a long, straight mound covering an access ramp to the underground burial chamber, which is set slightly to the south of the stupa of the mausoleum. A central mound may mark the geometric centre of the composition.

The subordinate tombs are unevenly distributed around the imperial mausoleums. They are of three kinds:

- Simple tombs, comprising a long, straight mound covering an access ramp to an underground vault, set in front of the stupa;
- Tombs with a main enclosure and a gateway on the south side, which also include, in addition to the arrangements of the simple tombs, a sacrificial hall and a central mound;
- Tombs with main and secondary enclosures, which also include, in addition to the arrangements of the tombs already described, Que towers, stele pavilions and a sacrificial hall.

The simple tombs are individual tombs, while the enclosure tombs may contain up to three vaults. As with the imperial tombs, some of the secondary tombs are protected by flood control works.

The function of the northern architectural complex appears to be linked to the operation of the funerary complex. It consists of a large rectangular space, enclosed by walls and organised into a series of peripheral and central courtyards, delimiting the spaces in which are located the remains of various buildings, which may have served as a Buddhist sanctuary or a sacrificial hall, as well as buildings used for administration.

An ensemble of flood control works was created alongside the development of the funerary site. Twenty-six dikes and six drainage ditches, with a cumulative length of more than three kilometres and more than two kilometres respectively, were identified on the site.

The analysis of the other remains of this necropolis and of the objects unearthed during archaeological excavations have made it possible to identify the style, appearance and construction and decoration techniques of its buildings.

Rammed earth, mud bricks and wood are the main materials used to construct the buildings of the funerary

complex. Stone is occasionally used, particularly for the facing of the dikes and for some dry stone subordinate tombs. Glazed terracotta is widely used for roofing and ornamentation.

The state of conservation of the remains on the site does not allow us to describe with certainty the buildings that comprise it. Sometimes, only the foundations remain. Studies of the larger remains enable us to describe the architectural arrangements of the stupas.

The Xixia stupas are massive buildings, usually octagonal in shape or, more rarely, circular. They have a solid internal structure made of rammed earth. They are conical in shape, with five to seven storeys narrowing towards the top, and are punctuated by glazed tile roofs, supported by wooden brackets. Wood is also used for the posts and beams forming the structure of the sacrificial halls or as structural reinforcements for the walls and towers of the mausoleum enclosures.

More than 7,000 ornaments, mainly made of terracotta or stone, have been unearthed at the foot of the buildings. These include zoomorphic motifs, lotus-shaped bases or roof finials, *jialingpinjia*, *dvarapala*, small columns decorated with dragons, fragments of Buddha and Bodhisattva statues, steles and *jingchuang*. They demonstrate the importance of Buddhist funerary traditions in the Xixia Empire.

The off-centre position of the buildings of the main enclosure, which leaves the geometric centre of the enclosure empty and reserved for the spirits, confirms the retention of ancestral Tangut beliefs, co-existing with the Buddhist faith. Another specific feature of the Xixia Imperial Tombs compared with the funerary architecture of the Chinese Tang and Song Dynasties is the position of the burial chamber, which is not placed directly below the stupa.

The furnishings found in the tombs, the zoomorphic statues and the remains of domestic animals evoke the pastoral origins and livestock rearing traditions of the Tanguts. However, the influence of the Tubo, Uighur, Tatar, Khitan and Jurchen peoples is indiscernible or only slightly apparent; the State Party confirmed this in the additional information sent to ICOMOS in November 2024.

The nominated property has an area of 3,899.00 ha, and a buffer zone of 40,569.50ha.

The Tanguts were originally nomadic herdspeople from the north-west of present-day China, in the provinces of Qinghai, Gansu and Ningxia. Under pressure from neighbouring populations, they migrated and settled in the foothills of the Helan Mountains, on the west bank of the Yellow River, from the 10th century onwards. Li Jiqian and Li Deming were the first monarchs to reign over the Tanguts, but it was in 1038 that the Xixia Empire was proclaimed, during the reign of Li Yuanhao.

The position of the territory of the Xixia Empire on the Silk Road increased its wealth and allowed it to develop a policy of trade with the interior regions, the western regions and Eurasia. For this purpose, a network of roads with regular postal relay stations was created. By building a powerful army, it ensured its longevity, expanded its territory and ensured the safe movement of people and goods.

Sedentarisation, the diversity of the population that made up the Xixia Empire and contact with travellers using the Silk Road allowed the Xixia civilisation to flourish in the spheres of literature, art, music and architecture. Institutions and administrations based on the Chinese imperial model were also developed, as well as a writing system based on Chinese characters, into which official documents were transcribed. Finally, Buddhism constituted a fundamental component of the Xixia civilisation.

In 1227, after numerous offensives, the Mongol army of Genghis Khan put an end to the Xixia Empire and destroyed its capital. The funerary complex was not spared. The Tangut Dynasty lasted 189 years and saw ten emperors reign.

Reduced to ruins, the Xixia Imperial Tombs, as well as the Xixia civilisation, would be forgotten for the next 700 years.

It was at the instigation of the Museum of Ningxia Hui Autonomous Region that the archaeological study of the remains of the funerary complex began in 1972, followed by periods of research and conservation work that have continued until the present day.

State of conservation

Most of the site has been preserved in its natural desert state, cut into by gullies. A small area of the site, less than three percent, is built on and occupied by a cemetery, or structures necessary for protection and management and for the museum functions of the site.

Of the nine mausoleums, eight have retained the majority of their component structures. The facings and the wooden and terracotta components have disappeared, revealing the internal structure of the rammed earth buildings. Due to the materials used and the destruction, the tombs are only partially intact, with sometimes only the foundations remaining. The burial chambers of the mausoleums have been looted and large pits dug, destroying part of the layout of the tombs. The imperial mausoleums, which have been regularly monitored and maintained since the end of the 1980s, are generally in a stable state of conservation.

The subordinate tombs, the northern architectural complex and the flood control works are between a stable to degraded state of conservation. Their remains are less robust and more fragile than those of the mausoleums, due to the initially smaller scale of the rammed earth buildings.

The destruction caused by army of Genghis Khan, followed by 700 years of abandonment, destroyed the structures and facings that preserved the core of the brickwork and exposed the rammed earth to the elements.

Since 1986, the State Party has been carrying out regular campaigns to consolidate all the remains, prioritising the imperial mausoleums.

In response to the ICOMOS interim report, the State Party specified that the 7,100 objects unearthed between 1972 and 2022 during various excavations had been deposited with several institutions, such as the Xixia Museum, where they are being studied and restored.

Since 2016, the Yinchuan Xixia Imperial Tombs Management Office has been implementing a site rehabilitation programme (the Xixia Imperial Tombs Environmental Remediation Project Design Scheme) that includes demolition, rehabilitation and redevelopment affecting the natural landscape, and facilities, as well as the transport infrastructure and networks. A demolition programme was implemented by local authorities, in consultation with stakeholders, between 2014 and 2019. During this period, the occupants of some businesses and homes were displaced and relocated.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is stable overall, given that these are essentially fragile archaeological remains.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are the climate and the effects of climate change, urban pressure and tourism, as well as mining or agricultural activities. There is also a moderate earthquake risk.

The nominated property is subject to varying degrees of flooding, rain and wind erosion, salinisation, growth of parasitic plants and biological effects. Increased precipitation and the consequent gully formation, as well as temperature fluctuations due to climate change are intensifying damage to the remains.

The earthquake risk appears to be reduced by the nature of the soil. However, the frequency of earthquakes in the Ningxia Region means that this data should be taken into account when monitoring the nominated property.

Other factors are likely to affect the nominated property and weaken the quality of its environment, such as urban pressure, particularly existing buildings to the north of Mausoleum No.6, the Taomengou mining operation, which extends over more than twenty square kilometres, and the vineyards to the east of Mausoleum No.3.

ICOMOS has asked for more details on the potential adverse impacts of the air force base on the integrity of the nominated property, both in its letter requesting additional information and in its interim report. The State Party has provided conclusive responses to these concerns; however, it will have to ensure that air traffic does not increase, to avoid any negative impacts on the nominated property caused by vibrations, and ensure monitoring of this.

ICOMOS considers that the state of conservation is generally good and that factors affecting the nominated property are under control overall. Climate and the effects of climate change should be considered as a priority.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- Xixia Imperial Tombs are the largest, most prestigious and best-preserved archaeological site of the Xixia Dynasty, which lasted nearly 200 years.
- The nominated property bears witness to the role played by the Xixia Empire in the economic, political, cultural and spiritual exchanges generated by the Silk Road from the 11th to 13th centuries in north-west China.
- The nominated property, in terms of its landscape, architectural and technical make-up, and in spiritual or religious terms, is the result of the interactions between the various ethnic groups that made up the population of the Xixia Empire.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the choice of the site and the spatial organisation of the funerary complex; the distribution of the spaces constituting the mausoleums, the architecture of the imperial tombs and that of the subordinate tombs; as well as the materials and techniques employed to build and decorate the tombs of the necropolis of the northern architectural complex and the flood control works.

Comparative analysis

The comparative analysis has been developed on the basis of a typological, chronological and thematic framework. It has examined properties in China, East Asia and throughout the world, inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

The comparative analysis is carried out according to four typologies: the other remains of the Xixia Dynasty; the imperial mausoleums of the principal dynasties of ancient China; the funerary sites of East Asia and, in particular, the properties included on the World Heritage List or

Tentative Lists; and, lastly, the World Heritage funerary sites in other regions of the world.

As regards the remains of the Xixia Dynasty, the analysis aims to demonstrate that no other site preserves imperial mausoleums and that other sites are not as representative in terms of scale and scope. The funerary sites representing the dynasties that reigned in China are analysed from two perspectives: diachronic and synchronic.

The analysis of sites from the 2nd century BCE to the 20th century in China, four of which are inscribed on the World Heritage List: the Mausoleum of the First Qin Emperor (1987, criteria (i), (iii), (iv) and (vi)), the Imperial Tombs of the Ming and Qing Dynasties (2000,2003 and 2004, criteria (i), (ii), (iii), (iv) and (vi)), the Capitals Cities and Tombs of the Ancient Koguryo Kingdom (2004, criteria (i), (ii), (iii), (iv) and (v)) and Yin Xu (2006, criteria (ii), (iii), (iv) and (vi)), shows the contribution of each of these sites to the general history of Chinese civilisation and their multiethnic nature, and underlines the importance of the contribution of the Xixia site to this group of properties already recognised through inscription on the World Heritage List.

The analysis of burial sites from the 10th to the 13th centuries and the seven dynasties or peoples present in the territory of present-day China aims to demonstrate the importance of the nominated property as a site representative of Tangut culture.

The analysis of the burial sites inscribed on the World Heritage List in East Asia focuses, in addition to the four Chinese properties mentioned above, on the Gyeongju Historic Areas (Republic of Korea, 2000, criteria (ii) and (iii)), the Baekje Historic Areas (Republic of Korea, 2015, criteria (ii) and (iii)), the Mozu-Furuichi Kofun Group: Mounded Tombs of Ancient Japan, (Japan, 2019, criteria (iii) and (iv)), the Complex of Koguryo Tombs (Democratic People's Republic of Korea, 2004, criteria (i), (ii), (iii) and (iv)) and finally, the Historic Monuments and Sites in Kaesong (Democratic People's Republic of Korea, 2013, criteria (ii) and (iii)).

The analysis highlights the contribution of the nominated property to the burial sites of Asia, as it is intended to fill a gap.

The analysis then focuses on fouteen burial sites inscribed on the World Heritage List in other regions of the world, all of which bear witness to ancient dynasties and civilisations. In this context, the nominated property is presented as contributing to the enrichment of the typology concerned.

Lastly, the World Heritage property of the Site of Xanadu (China, 2012 (ii), (iii), (iv) and (vi)), the legendary capital of the Mongol Kublai Khan, is compared, although it is not a burial site.

The analysis concludes that the nominated property is the largest, most historically important and most significant of the Xixia Dynasty, that it provides evidence of a civilisation that developed between the 10th and the 13th centuries in north-west China, and that this civilisation is not represented among the World Heritage properties.

ICOMOS considers that the rationale behind the comparative analysis is relevant and that the selection of sites for comparison is appropriate within the geo-cultural region.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii) and (iii).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design:

This criterion is justified by the State Party on the grounds that the Xixia Imperial Tombs, due to their spatial organisation and their architectural, technical and stylistic arrangements, through the expression of a spirituality that combines Buddhism with Feng Shui traditions, provide evidence of a multicultural civilisation based on agropastoralism and trade, resulting from exchanges between the ethnic groups populating the region of the Ningxia plains that developed between the 11th and 13th centuries in north-west China.

ICOMOS has requested clarification on how the tombs would reflect the beliefs and funerary customs of the Tanguts and the other communities that were part of the Xixia Dynasty. In the additional information of November 2024, the State Party indicated that the influence of these other communities was limited in the imperial mausoleums: however, there were some examples that could be linked to the traditions of the Khitan or Jurchen peoples. ICOMOS considers that the State Party has not provided sufficient information to demonstrate the interaction between the various ethnic groups that made up the population of the Xixia Empire. ICOMOS nevertheless considers that the architectural style of the Xixia Imperial Tombs reflects a mixture of influences from multiple sources, ranging from the traditions of the Song and Tang dynasties to the beliefs and funerary customs of the Tanguts, where adherence to Buddhism and surviving ancestral religious and cultural traditions predominated. These characteristics are fully expressed in the spatial organisation, architectural arrangements and decorative elements of the tombs and buildings that make up the Xixia funerary complex.

ICOMOS considers that this criterion is demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the imperial mausoleums, the subordinate tombs, the flood control structures and the site of the northern architectural complex illustrate the spiritual and cultural originality of the Xixia Dynasty and the Tangut people. A multicultural civilisation in contact with the Silk Roads, which developed through cultural and commercial exchange in north-west China for nearly 200 years, from the 11th to the 13th century.

ICOMOS considers that the additional information provided by the State Party in November 2024 is not sufficient to demonstrate the multi-cultural dimension of the Xixia civilisation. However, the nominated property constitutes important evidence of the Xixia culture and its imperial lineage, which was established by the Tangut people and flourished in north-west China for nearly 200 years, from the 11th to the 13th century. The archaeological remains preserved attest to an original civilisation whose population was mainly composed of the Tanguts, an initially nomadic people, who, when they settled, developed a specific funerary culture of which Buddhism was an essential part, combined with Confucian practices, the geomantic principles of Feng Shui and surviving ancestral animist beliefs.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the attributes identified by the State Party express the proposed Outstanding Universal Value. They provide pertinent details of all the characteristic features of the nominated property and their association with the site in question.

ICOMOS considers that the nominated property meets criteria (ii) and (iii).

Integrity and authenticity

Integrity

The nominated property encompasses, within the boundary defined by the State Party, a set of elements consisting of the imperial mausoleums, the subordinate tombs, the flood control works and an architectural complex associated with the tombs. All of these elements are necessary to express the proposed Outstanding Universal Value. The dimensions of the burial site, which encompass all of the tombs recorded to date and its immediate desert setting, are sufficient to fully represent the features and processes that convey the significance of the nominated property. The site is regularly maintained, and work to protect against factors affecting the nominated property has either been carried out or is scheduled.

In the additional information of November 2024 and February 2025, the State Party specified that no remains

had been uncovered during the construction of the air force base, and that landscaping was reducing its visual impact. This landscaping work is continuing. Regarding the risk of air polluting emissions from aircraft or vibrations during take-off and landing, the State Party indicated that air quality measurements had confirmed that the air force base was having no negative impact on the conservation of the nominated property. Monitoring of the conservation of the nominated property has confirmed that the operation of the air force base was not affecting the stability of the structures. This monitoring will be regularly carried out as part of the management of the nominated property.

ICOMOS considers that the integrity of the nominated property has been demonstrated.

Authenticity

The nominated property was a funerary site from the 11th to the 13th century and is preserved in a state of both exposed and buried archaeological remains.

The nominated property is established within a preserved natural desert setting. Its visual and spiritual connection with the Helan Mountains is also preserved. The long period of abandonment of the site after the Mongol attacks in the 13th century and the lack of subsequent occupation have ensured, despite occasional looting of the funerary chambers of the imperial mausoleums, a high level of authenticity of the nominated property in relation to its context and its original purpose. Each tomb, whether a mausoleum or a subordinate tomb, the flood control works and the architectural complex, are preserved in place in their original location and have retained enough materials to remain coherent.

The State Party specified in the additional information of February 2025 that the attribution of each mausoleum was based on a report published in 1995 (the Xixia Imperial Tombs: China Field Archaeology Report), and that there was no consensus on this hypothesis within the scientific community, given the current status of the archaeological research.

The original construction techniques and materials were respected during the conservation work, with a moderate amount of modern additions. All the works are documented; archaeological material unearthed during the work and excavations is preserved and displayed in the site museum or in cultural institutions.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met.

Boundaries

The land of the nominated property is owned by the State and represents an area of 3,899 ha. There is no longer a permanent population residing within the nominated property. The buffer zone has 78,000 inhabitants. There is an active military air force base neighbouring the site.

The boundaries of the nominated property are bordered by the Yinfa motorway to the south-west and motorway 110 to the south-east, the foothills of the Helan Mountains to the north/north-west and the air force base and its ring road to the north/north-east.

Most of the nominated property has been preserved in its desert state, cut into by gullies. Less than three per cent of the area of the site is built on and is occupied by a cemetery or structures necessary for protection and management and for the museum functions of the site. The boundaries of the nominated property contain all the identified remains of the funerary complex.

The additional information provided in November 2024 by the State Party specifies that the western boundary of the nominated property, at the foot of the Helan Mountains, was drawn by connecting the peaks of the hills forming the smallest foothills of the Helan Mountains. ICOMOS also notes that the satellite photograph of February 1966 does not show any significant legible remains of ancient residences or royal tombs on the site of the air force base neighbouring the nominated property. The State Party indicates as well that, in the event of discoveries of remains related to the Xixia funerary complex, these will be preserved *in situ* and the boundaries of the conservation area of the National Priority Protected Site of the Xixia Imperial Tombs modified accordingly.

The proposed buffer zone takes into consideration the spiritual symbolism presiding over the establishment of the imperial funerary complex sheltering under the peaks of the Helan Mountains to the west and on a part of the piedmont plain that slopes towards the Yellow River.

Evaluation of the proposed justification for inscription

In summary, ICOMOS believes that the comparative analysis justifies consideration of the property for inscription on the World Heritage List and that criteria (ii) and (iii) are demonstrated. The main factors affecting the nominated property are wind erosion, the effects of flooding and intense rainfall events related to climate change, the air force base and urban and tourism pressures. ICOMOS considers that the state of conservation is generally good and that monitoring is effective. However, the State Party should strengthen its ongoing monitoring and maintenance of the archaeological remains, particularly through preventative monitoring, the development of consolidation measures and the preparation of a comprehensive conservation plan for the subordinate tombs. The conditions of integrity and authenticity are met, and the proposed boundaries are appropriate.

4 Conservation measures and monitoring

Documentation

The Yinchuan Xixia Imperial Tombs Management Office is responsible for collecting and conserving the archives. It has put together a complete database of archives.

The documentation consists of old historical works, works on Xixia literature, photographic reports and orthophotographic mapping of the remains and a photographic inventory of the furnishings that make up the museum's collections, monographs, restoration reports and the work of researchers or university articles.

In the additional information of February 2025, the State Party specifies that sixty conservation projects have been implemented at the site. These works have all been documented graphically and photographically; they have been mapped, and the techniques used have been specified.

Conservation measures

The conservation and management plans for the Xixia Imperial Tombs (2019-2035 and 2023-2035) provide for scientific studies, documentation of the nominated property, ongoing monitoring, routine maintenance of the remains and occasional restoration work. The additional information provided by the State Party in February 2025 details the work carried out based on the damage observed, the conservation techniques used and the materials and products used. These observations are accompanied by photographic and cartographic illustrations.

From 2002 to 2016, conservation work was carried out under the supervision of experts and university researchers, for each of the mausoleums. Several series of measures were carried out to ensure their stability and preservation. In addition, from 2016 to 2017, conservation and maintenance work were carried out on 44 of the 271 subordinate tombs. The conservation techniques include strengthening the earthen cores and comprehensive treatment of the surfaces to address structural instability and surface erosion. These techniques take into account and integrate the geographical and weather conditions of the site, the local materials, and research into traditional construction techniques.

In the additional information sent in November 2024, the State Party indicates that Mausoleums No.7 and No.8, as well as the northern architectural complex, have been excavated, producing significant results in terms of understanding of the remains; the publication of the results was scheduled for 2024. The excavation of Mausoleum No. 9 will follow this publication, under the "Archaeological Work Plan for Xixia Imperial Tombs" programme (2024-2033).

A detailed, phased overall programme remains to be drawn up for the research and conservation of all the subordinate tombs.

A permanent monitoring programme has been implemented near the mausoleums, associated with the restoration of land and the gullies created by flooding. Flood protection works were created in 1998 and 2003 for Mausoleum No.3 and in 2013 for Mausoleums No.4 and No.6

The landscape setting has been restored by removing weeds, re-establishing endemic species and preserving the screens of tall trees that protect against wind erosion.

Access to the site is controlled by a security system; the areas of the nominated property and of each mausoleum are fenced and regularly patrolled.

Monitoring

A real-time monitoring system for the funerary complex is organised into four themes: preservation and protection of the nominated property; factors affecting the nominated property; management assurance; and use and research. Each theme has two levels of monitoring, for which the methodology, the frequency of measures and the responsible body are defined.

In the additional information provided in November 2024, the State Party indicates that to manage the monitoring of these indicators, a general information and monitoring system has been in operation since July 2024. The purpose of this system is to enable or facilitate: the organisation of documentary and archival data; the management of data on the conservation of the nominated property, including state of conservation reports; the management of data concerning the safety and security of, and visits to, the nominated property; the identification of factors affecting the nominated property, associated with alert indicators based on predefined evaluation criteria; access to data for scientific research institutions and organisations; and public access to information on the nominated property.

Currently, the monitoring of the nominated property only includes real-time monitoring of the nine imperial mausoleums and eight subordinate tombs: two tombs in each of Zones I to IV. The real-time monitoring relates to their natural and climatic environment, safety and visitor management as well as monitoring the stability of each of these elements.

ICOMOS considers that the system for monitoring the state of conservation, as described, aims to take into consideration all the attributes expressing the proposed Outstanding Universal Value.

ICOMOS considers that it would be advisable that the monitoring system is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

ICOMOS considers that it would also be useful to implement a research and conservation programme for all the subordinate tombs.

5 Protection and management

Legal protection

In 1988, the nominated property was declared a National Priority Protected Site and, in the same year, a National Key Scenic Area. In 1991, the regional authorities declared it a conservation area.

The nominated property benefits from the highest level of protection: the Law of the People's Republic of China on the Protection of Cultural Relics (1982, revised in 2017). Under its terms, activities related to the excavation, restoration and preservation of major heritage sites are strictly regulated.

Other legislative texts contribute to the protection of the site: the Urban and Rural Planning Law of the People's Republic of China (revised in 2019), the Regulations for the Implementation of the Law of the People's Republic of China on the Protection of Cultural Relics (revised in 2017), the Administrative Measures for the Protection and Management of World Heritage Sites (2006), the Administrative Measures for the Inspection and Management of China's World Cultural Heritage Sites (2006) and the Administrative Measures for Cultural Heritage Conservation Works (2003).

Legal texts of the Ningxia Hui Autonomous Region and the Yinchuan Municipality are also included in this system, such as the Rules of Ningxia Hui Autonomous Region for the Implementation of the Law of the People's Republic of China on the Protection of Cultural Relics (2006, amended in 2021), the Regulations of Yinchuan Municipality for the Conservation of Xixia Imperial Tombs (revised in 2016) and the Regulation on the Protection of the Famous Historical and Cultural City of Yinchuan (revised in 2023).

The Helan Mountains constitute a National Nature Reserve (1988), for which the following apply: Forest Law of the People's Republic of China (revised in 2019), Regulations of the People's Republic of China on Nature Reserves (revised in 2017), and the Regulations of Ningxia Hui Autonomous Region on the Liupan Mountain, Helan Mountains, and Luoshan Mountains National Nature Reserves (amended in 2017).

The National Nature Reserve encompasses all the mountain ranges located in the nominated property as well as most of the mountains located in the buffer zone.

Management system

The management system identifies four competent administrative authorities that are responsible for managing the nominated property: central government, the Ningxia Hui Autonomous Region, the Yinchuan Municipality and the Yinchuan Xixia Imperial Tombs Management Office. They are responsible for ensuring compliance with the legislative and regulatory framework of the nominated property.

In the additional information provided in November 2024, the State Party specifies that the Yinchuan Municipal Government adopted in August 2024 a Coordinated Management Mechanism for the Conservation of the Cultural Heritage at the Xixia Imperial Tombs, bringing together all of the civil and military services for the protection and management of the nominated property (Yin Zheng Ban Fa [2024] No. 63).

In accordance with the regulations of the Yinchuan Municipality, the Yinchuan Cultural Heritage Bureau is the competent department for the protection and management of the Xixia Imperial Tombs in general, under the scientific and technical supervision of the National Cultural Heritage Administration.

The Yinchuan Xixia Imperial Tombs Management Office is responsible for the daily implementation of measures to protect and manage the tombs.

In the additional information received in November 2024, the State Party reported that in July 2024, by municipal decision (Yin Zheng Han [2024] No. 87), the company Xixia Imperial Tombs Cultural Tourism Development Co. Ltd, which is responsible for managing visitor services, was attached to the Yinchuan Xixia Imperial Tombs Management Office.

The Office has a team of twenty-eight people, ten of whom have university degrees in history, museology, urban planning, archives and records management, historical literature, etc. This team is able to perform the daily tasks for which it is responsible. The State Party indicates that it is aware of the relatively low staffing levels relative to needs, the high average age of the staff, and the skills that should be developed in the field of archaeology.

Stable funding for the conservation and management of the nominated property is provided by grants from the State and regional and local authorities, as well as revenue from entrance fees.

The management system assigns to the Yinchuan Xixia Imperial Tombs Management Office the supervision of the programming and consuming of credits. These credits are dedicated to the protection and maintenance of the heritage constituting the nominated property, the development of the infrastructure necessary for the operation of the site and its conservation, including flood protection structures or the improvement of the natural environment of the nominated property and its buffer zone. They are also used for the construction of the site museum and security systems, the promotion of the site and for scientific research, personnel expenses and the professional training of managers and agents.

Potential partners to support the Bureau's missions come from the National Cultural Heritage Administration and the Ningxia Hui Autonomous Region Cultural Heritage Bureau, national professional research institutions, higher education institutions and technical design units.

The Conservation Plan of Xixia Imperial Tombs (2019-2035) was approved and published by the People's Government of Ningxia Hui Autonomous Region in January 2024. It builds on and complements previous planning initiatives, such as the Plan for the Xixia Imperial Tombs Archaeological Park (2013-2025) and the Territorial Spatial Master Plan of Yinchuan Municipality (2021-2035). In addition, the Territorial Spatial Master Plan of Yinchuan Municipality (2021-2035) integrates the conservation of the Xixia Imperial Tombs with the ecological protection of Helan. It also takes into account the protection of the mountains and the cultural heritage.

The plan covers the nominated property and its buffer zone. It is organised into three phases: short term (2023-2025), medium term (2026-2030) and long term (2031-2035).

Developed on the basis of previous plans, the Conservation and Management Plan of Xixia Imperial Tombs (2023-2035) provides for a conservation zoning plan along with management rules, evaluates the state of conservation of the nominated property and provides for enhanced measures as well as the implementation of actions for protection, management, use and research. It also defines a strategy for the coordinated development of heritage protection and its local economic and social aspects. Finally, it provides for a set of measures to take into account natural risks or risks related to visits and urban pressure.

The additional information received in November 2024 specifies the content of the work plan for archaeological activities from 2024 to 2033, including the excavation of the subordinate tombs to gain a deeper understanding of their features and their historical and social significance, and the study of the flood protection structures.

The additional information of February 2025 indicates that interventions at the site are based on a series of research programmes, notably the following: Integrated Technologies for Protecting Earthen Sites in Arid Environments and Application Demonstration (2014-2016); Research on the Degradation Process and Conservation Technologies of Earthen Sites under Multi-Field Coupling (2020-2023); and Research on Freeze-Thaw Damage Mechanisms and Monitoring Technologies for Earthen Sites (2023-2026).

The additional information of November 2024 indicates that Heritage Impact Assessment has been incorporated into the instruction process for construction projects. This information also specifies that the Yinchuan Municipality has signed a Joint Management Agreement for Cultural Heritage Conservation with the competent authorities of the B4/JK-4 zone, under which the future management and use of the zone will give priority to the safeguarding of the site, the protection of the landscape and the preservation of views.

Visitor management

The presentation and interpretation of the Xixia Imperial Tombs takes the form of a thematic tour through the museum. An online platform and videos complete the experience.

Since 2015, the museum, along with the tourist service facilities that adversely impact the landscape of the site, have been successively relocated. Functional and aesthetic improvements have been made to the remaining facilities. The new museum displays 6,662 objects from excavations conducted at the site. It presents the history of the Xixia Imperial Tombs by means of models, photographs, multimedia resources and thematic exhibitions.

The tourist services adjacent to the mausoleums include small exhibition rooms, toilets and rest areas, including for children and people with reduced mobility. Six main tourist service stations are located at the site.

New pathways have been created, preserving the archaeological areas. Passageways provide access to the various enclosures without damaging the aboveground remains.

In the additional information of February 2025, the State Party specified that the Specialized Plan for Cultural Tourism of Xixia Imperial Tombs has two aims: to develop the link between the nominated property and other sites related to Xixia culture; and to distribute tourism pressure across all sites to better manage the capacity of the nominated property.

Community involvement

The population is regularly informed by local government of the progress of the nomination process. People can provide comments and suggestions regarding the protection and management of the nominated property on the official website of the Xixia Imperial Tombs.

In October/November 2023, the Yinchuan Xixia Imperial Tombs Management Office launched a public inquiry into the Conservation Plan of Xixia Imperial Tombs (2019-2035). Some of the suggestions have been adopted. In November and December 2023, a public inquiry was held regarding the Conservation and Management Plan of Xixia Imperial Tombs (2023-2035), but without any input from the local population. Since 2022, the Office has been calling upon volunteer residents from the buffer zone to contribute to security and promote the conservation of the nominated property.

The development of tourism has also generated lowskilled jobs for local communities and villages in the sale of tourist products and the provision of tourist services (security guards, maintenance staff, bus drivers, etc.).

Regarding the resettlement of residents and businesses initially located within the nominated property, the State Party advised in the additional information of February 2025 that, following negotiations, four households, a

livestock farm, and four businesses had been relocated in 2016 and 2019. Those entitled were compensated and resettled in the buffer zone, where they have pursued or improved their activities. Five businesses were relocated outside the buffer zone between 2014 and 2016 and compensated after negotiations with the Yinchuan Municipal Government. The wine growing business has relocated its activity outside the buffer zone, with the agreement and support of the municipal authorities; the vineyard will be closed in 2029, at the end of its operating contract.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated property is complete and that the management system is sound. ICOMOS considers that the proposed Conservation Plan of Xixia Imperial Tombs (2019-2035) and the Yinchuan Xixia Imperial Tombs Management Office are well designed and potentially effective, provided that research programmes and conservation work continue and are extended to all the subordinate tombs and surviving structures within the nominated property; that the measures of the Specialized Plan for Cultural Tourism of Xixia Imperial Tombs are regularly assessed; and that human and material resources are guaranteed or even developed to respond to the concerns raised by the State Party regarding the insufficient numbers and the age of the staff responsible for managing the nominated property. The involvement of residents in conservation and decision-making has to be ensured and sustained for the long-term conservation of the nominated property.

6 Conclusion

The Xixia Imperial Tombs are a huge necropolis in northwest China, located in the foothills of the Helan Mountains, a mountain range marking the western boundary between the Gobi Desert and the Ningxia floodplain, which drains into the Yellow River. The necropolis comprises nine imperial mausoleums of the Xixia Dynasty, several hundred of subordinate tombs and an architectural complex.

This archaeological site illustrates the spiritual and cultural originality of the Tangut, nomadic herdspeople who settled in contact with the Silk Road and who, thanks to cultural and commercial exchanges, prospered for nearly 200 years, from the 11th to the 13th centuries, and developed a culture based on Chinese imperial models, of which Buddhism is an essential part, combined with Confucian practices, the geomantic principles of Feng Shui and surviving ancestral animist beliefs.

The comparative analysis demonstrates the historical importance of the Xixia Dynasty and of Tangut culture.

ICOMOS considers that the nominated property is a remarkable example testifying to the Tangut civilisation

and its funerary culture. ICOMOS considers that criteria (ii) and (iii) have been demonstrated and that the conditions of integrity and authenticity of the nominated property have been met.

ICOMOS considers that the state of conservation is generally good and that the monitoring is effective. As this is a collection of archaeological remains, ICOMOS considers that the ongoing monitoring and maintenance of all the remains is imperative. The factors affecting the nominated property are wind erosion, the effects of flooding and intense rainfall events related to climate change, the air force base and urban and tourism pressures.

ICOMOS considers that, while the legal protection and management system are adequate, their effectiveness will depend on coordination between national and local heritage agencies. The State Party has implemented measures to ensure this coordination. The continuation and development of training to strengthen the skills of the individuals assigned to these tasks is essential. Lastly, community involvement must be continued through the implementation of participatory mechanisms.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Xixia Imperial Tombs, China, be inscribed on the World Heritage List on the basis of **criteria** (ii) and (iii).

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Xixia Imperial Tombs are a necropolis of the Xixia Dynasty, located in the Ningxia Hui Autonomous Region of north-west China, in the foothills of the Helan Mountains, and formed from the 11th to 13th centuries. Comprising nine imperial mausoleums, 271 subordinate tombs, a northern architectural complex and thirty-two flood control works, this necropolis is a unique testimony to the Xixia Dynasty and its imperial lineage, which lasted nearly 200 years and was established by the Tanguts, nomadic herdspeople who settled in a region crossed by the Silk Road, and brought together a diverse population composed, in addition to the Tanguts, of Han Chinese, Tibetans, Uighurs, Khitans and Jurchens.

Through contact with merchants, caravans, monks and nomads, the Tanguts developed a civilisation based on the Chinese imperial model, of which Buddhism was an essential part. This is evidenced by very large, diverse architectural sites, as well as a wealth of objects excavated at the property, including fragments of stelae in Tangut script.

Criterion (ii): The Xixia Imperial Tombs bear witness to cultural and religious influences from multiple sources,

ranging from the traditions of the Song and Tang dynasties to the beliefs and funerary customs of the Tanguts, where adherence to Buddhism dominated and ancestral traditions persisted. These characteristics are fully reflected in the spatial organisation, design and architecture of the Xixia funerary complex.

Criterion (iii): The Xixia Imperial Tombs illustrate the spiritual and cultural originality of the Xixia Dynasty and the Tangut people. This civilisation developed for nearly 200 years in contact with the Silk Road through cultural and commercial exchange in north-west China, from the 11th to the 13th century.

Integrity

The property contains the only imperial tombs identified in the territory of the Tanguts that are associated with a set of subordinate tombs and supplementary constructions and works, allowing for a complete representation of the property and its architectural features in its historical setting. The remains forming the necropolis are in a generally good state of conservation, and the main factors affecting the property are the effects of climate change, tourism and urban growth. The boundaries are adequate, and the buffer zone provides an additional layer of protection.

Authenticity

The property is located in an unspoiled natural desert setting. Its visual and spiritual connection to the Helan Mountains is also preserved. Each tomb, whether a mausoleum or a subordinate tomb, the flood control works and the architectural complex are preserved in place in their original location and have retained enough materials to remain coherent.

Protection and management requirements

The property has been a National Priority Protected Site since 1988. Its perimeter was declared a conservation area by the regional authorities in 1991. All interventions on the property are governed by the national regime for the protection of cultural relics. A series of laws and regulations complete and strengthen this system.

Four competent administrative authorities are responsible for managing the property: the central government, the Ningxia Hui Autonomous Region, the Yinchuan Municipality and the Yinchuan Xixia Imperial Tombs Management Office, to which is attached the Xixia Imperial Tombs Cultural Tourism Development Co. Ltd. These authorities are tasked with ensuring, each at its own level, compliance with the legislative and regulatory framework for the conservation and management of the property.

To this end, these authorities have adopted the Conservation Plan of Xixia Imperial Tombs (2019-2035), approved and published by the People's Government of Ningxia Hui Autonomous Region in January 2024. This plan builds on and supplements previous planning

arrangements, and provides for a conservation area plan with management rules.

The Conservation and Management Plan of Xixia Imperial Tombs (2023-2035) assesses the state of conservation of the property and provides for enhanced measures as well as the implementation of actions for protection, management, use and research. It also defines a strategy for the coordinated development of heritage protection and its economic and social aspects at the local level. Finally, it provides for a set of measures to take into account natural risks as well as urban or tourism-related pressures.

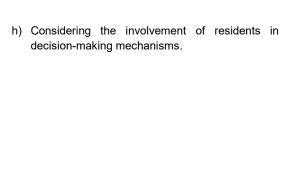
In addition to these specialised conservation plans, the Territorial Spatial Master Plan of Yinchuan Municipality (2021-2035) integrates the conservation of the Xixia Imperial Tombs within the ecological protection of Helan. It also takes into account the protection of the mountains and the cultural heritage.

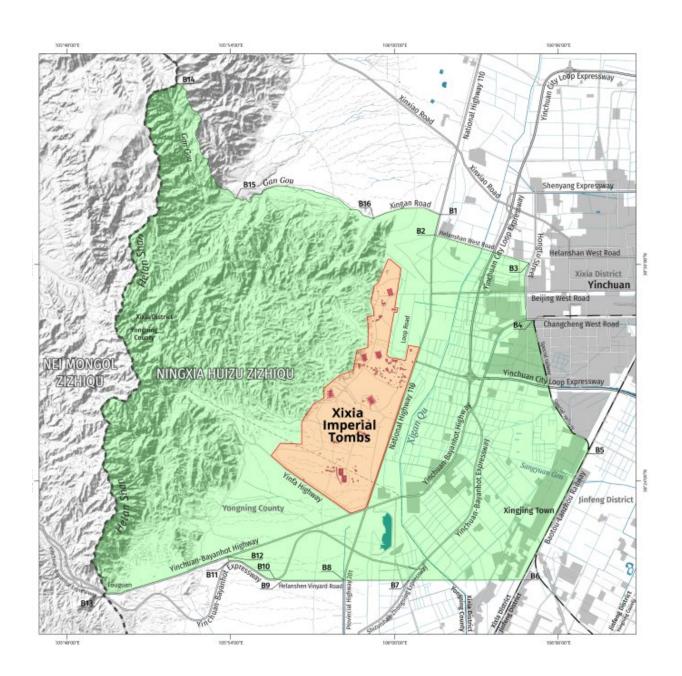
These provisions provide legal, institutional, and management guarantees for the protection of the conditions of integrity and authenticity of the property.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- Extending conservation works to all the subordinate tombs and remaining structures on the property.
- b) strengthen the ongoing monitoring and maintenance of the archaeological remains, particularly through preventative monitoring, the development of consolidation measures and the preparation of a comprehensive conservation plan for the subordinate tombs.
- c) Continuing the measures to control the effects of the operation of the air force base and ensuring that air traffic does not increase in order to avoid any negative impacts on the property caused by vibrations.
- d) Continuing research programmes related to climate change and its effect on the archaeological remains, including the subordinate tombs and structures,
- e) Publishing research reports and the results of archaeological excavations on a regular basis,
- f) Providing the human and material resources required to ensure the management of the property,
- Regularly assessing the implementation of the measures of the Specialized Plan for Cultural Tourism of Xixia Imperial Tombs,





Map showing the boundaries of the nominated property

Maratha Military Landscapes of India (India) No 1739

1 Basic information

Official name as proposed by the State Party Maratha Military Landscapes of India

Location

Salher Fort Nashik District

Shivneri Fort, Lohagad, Rajgad Pune District

Khanderi Fort, Raigad, Pratapgad Raigad District

Suvarnadurg, Vijaydurg Ratnagiri District

Panhala Kolhapur District

Sindhudurg
Sindhudurg District

Maharashtra

Gingee Fort Villupuram District Tamil Nadu

India

Brief description

The Maratha Military Landscapes of India comprises twelve large-scale fortifications with immediately adjacent topographic, geomorphological and environmental features. They include four maritime forts located along the Konkan Coast, namely Khanderi, Suvarnadurg, Sindhudurg and Vijaydurg Forts, and eight hill forts, of which seven are erected on the Sahyadri Range (also known as Western Ghats), namely, Salher-Salota, Shivneri, Lohagad-Visapur, Raigad, Rajgad, Pratapgad and Panhala, all in Maharashtra, whilst Gingee Fort is located on the Eastern Ghats, in Tamil Nadu. They have been either conquered, adapted, reinforced, expanded or constructed by the Marathas and were part of the dense and complex fortification system they developed to extend defence, protection of trade, military territorial control and expansion. This fortification system contributed to their rapid rise to power and affirmation as major military and political players in the Indian Subcontinent between the second half of the 17th century and the early 19th century, until their rule was ended by the British Empire.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of twelve *sites*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a series of cultural landscapes.

Included in the Tentative List

13 April 2021 as "Serial Nomination of Maratha Military Architecture in Maharashtra". The Tentative List entry includes a larger collection of forts – fourteen instead of twelve – than the nominated property and slightly different component parts (only eight of the initial fourteen component parts have been confirmed in the nominated series).

Two of the nominated forts – Suvarnadurg and Vijaydurg – are also part of the Tentative List entry "Serial nomination of Coastal Fortifications along the Konkan Coast, Maharashtra", included in the Tentative List on 3 January 2024

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, as well as their conservation and management, were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 24 September to 9 October 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 24 September 2024 requesting further information about the description and historic context for the development of the nominated property, the nomination approach, the rationale for the selection of the component parts, the protection and management requirements, and ongoing and upcoming projects.

Additional information was received from the State Party on 28 October 2024.

An interim report was provided to the State Party on 19 December 2024 summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the historical context, pattern of settlement and territorial control immediately before the rise of the Marathas, the fortification system and military strategy, the description of the component parts, the rationale for the selection of the component parts, the cultural landscape, changes to the delineation of boundaries, factors affecting some of the nominated component parts, and protection and management.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report 12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Maratha Military Landscapes of India comprises twelve large-scale fortifications with immediately adjacent topographic, geomorphological and environmental features. Component parts 01 to 11 are located in Maharashtra State, partly along the Konkan coastline and partly inland, in the Sahyadri Range of the Ghats, whilst component part 12, Gingee Fort, is located in Tamil Nadu.

The specific geographic features of Maharashtra – a narrow coastal strip on the western side, from which the Sahyadri Range (or Western Ghats) rise abruptly, forming separate hilltops, narrow valleys and few passes, and a plateau, the Desh, on the eastern side – defined the strategic role of the Western Ghats in the territorial control of the whole region. Each polity, sultanate or kingdom aiming to expand in the Deccan plateau had to control this mountain range. Therefore, over time, many forts came to be constructed on the hilltops to control trade routes; the high density of fortifications in this mountainous region reflects these geopolitical conditions.

The Maratha chiefs served as military commanders for the Deccan Sultanates for about two centuries. Thanks to these services, they obtained privileges, territorial grants and rights that gave them some control over territories, people, and shares in tax collection. Thanks to Chhatrapati Shivaji Maharaj, the Bhonsle clan emerged in the 17th century among other clans amidst the power vacuum left by the weakening of the Deccan Muslim polities in their attempts to resist the Mughal efforts to control the region. Shivaji established the first Maratha Kingdom, was crowned Chhatrapati, or king, and is considered the most charismatic of the Maratha rulers.

Shivaji Bhonsle and the Marathas harnessed and further developed the existing settlement pattern and fort network to deploy their strategy for expanding their control over the territory. This strategy was based on guerrilla warfare, extracting protection tolls from competing powers to protect trade from depredators (*chauth*), revenue tax on crops (*sardeshmukhi*), and negotiations.

To control their territory, the Marathas relied on a quasifeudal system, adopting, in particular, the principle of independence of the Maratha chiefs in the conquered territories and a centralising policy based on the administration traditions of the supplanted powers. The power of the Marathas was essentially based on its many rural forts, a large number of which were conquered, reinforced and built by Shivaji during his rule.. Understanding the importance of controlling the coasts, Shivaji also took, built and strengthened forts along the Konkan Coast. The network of forts formed a vast resistance network, particularly against the Mughal Empire, throughout the centuries. These forts were not simply defensive units but also administrative centres, located close to but separate from mercantile and civilian towns in the plain.

The strengthened and densified fortification network to control trade routes through the Ghats and part of the coast to secure trade gave the Marathas the advantage needed to control Maharashtra under Shivaji's leadership, lay down the foundations of the subsequent Maratha expansion northwards, and erode the influence and territory of the Mughal Empire.

The nominated series includes coastal, island and hill forts, which the Marathas either built, conquered, and/or rearranged during their initial phase of expansion in the 17th and early 18th centuries, especially during the rule of Shivaji. Their territorial scope covers the territory in the hands of the Marathas as of 1680, when Shivaji died.

Hill forts

Component part 01: Salher Fort

Salher is located in the rugged Dolbari sub-ranges, and is the highest fort in the Western Ghats. It includes rock-cut monolithic gateways, steep escarpments, water reservoirs, and ancillary structures. The design and location of Salher Fort on the Burhanpur trade axis facilitated surveillance and control of trade. The fort fell into the hands of the Mughals in 1638. Shivaji captured it from the Mughals in 1672 during the Battle of Salher and used it as a base for expanding Maratha control northward. Following the first additional information request and the evaluation mission, the State Party has modified the boundaries of this component part to include the twin-fort named Salota.

Component part 02: Shivneri Fort

Known as the birthplace of Chhatrapati Shivaji Maharaj (1627), Shivneri Fort combines a triangular layout with ridges and bastions. As a site of long-lasting occupation, it hosts ancient Buddhist caves, water cisterns, and layered gateways, exhibiting tangible vestiges of its century-long multi-layered structures. Historically controlled by different

Sultanates, Shivneri came under Maratha rule in 1595; in 1637, the father of Shivaji ceded the fort to the Mughals and the Bijapur Sultanate. Strengthened in the 17th century to ensure regional dominance and protect trade routes to Kalyan and Thane, it was demanded back by the Marathas in 1716. However, it was only transferred back to the Marathas in 1760, before being ceded again to the Mughals in 1762 after a military defeat.

Component part 06: Rajgad

Known for its sprawling design across ridges and spurs, Rajgad Fort was part of the fief of Shivaji's father and served as the first capital of Shivaji. The multi-tiered architecture of the fort includes palaces, bastions, *maachi* (vast expanses of open ground) and storage facilities. Rajgad witnessed numerous battles and served as a planning hub for military campaigns. It remained an administrative centre until the capital was moved to Raigad (component part 05).

Component part 07: Pratapgad

Located on the Sahyadri mountain ridge, this hill-forest fort features steep escarpment, bastions, ramparts, *maachi*, water reservoirs, and a citadel with royal and administrative buildings. Its location amidst dense forests supported its design. Built in 1656 by order of Shivaji, Pratapgad Fort played a role in the Battle of Pratapgad (1659), where the forces of Shivaji defeated Afzal Khan of the Bijapur Sultanate. The location of the fort ensured control over the Mahabaleshwar region and enabled Shivaji to gain control over Raigad (component part 05). Today, Pratapgad includes an inhabited settlement.

Component part 05: Raigad

Raigad integrates steep escarpments with layered fortifications. Selected as his second capital for its strategic and impregnable location, the fort was reconstructed by Shivaji in 1662 to include the palace of the King, a marketplace, a rainwater harvesting system and administrative facilities. Raigad became the administrative and ceremonial centre of the Maratha Kingdom. The design of the fort resisted multiple Mughal sieges until it was ceded to the British in 1818. The fort holds strong archaeological potential, but it has not been systematically explored yet.

Component part 03: Lohagad

Situated on the Bor Pass, Lohagad Fort features fortified gates, bastions, and rock-cut caves. Buddhist caves dating to as early as 200 BCE attest to long-lasting occupation. The site historically served as a treasury and food storage hub during sieges. The fort was equipped with a twin fort, Visapur Fort, erected on a hilltop facing Lohagad. Throughout its existence, Lohagad frequently changed hands between competing regional powers. Shivaji recaptured it from the Mughals in 1670, and it was later held by the Peshwa. In response to the request for additional information in September 2024, the component part now also includes the twin fort of Visapur.

Component part 09: Panhala Fort

Situated in Kolhapur District, this hill-plateau fort dates back to the 12th century; it includes rock-cut caves, a citadel, fortifications, seven bastions, gateways, water tanks, granaries, tunnels, a "hidden well", with a complex ventilation system, and a position overlooking the surrounding terrain. Panhala was captured by Shivaji in 1659, and the fort played a role in the campaigns of Shivaji against the Adil Shahi dynasty. It also served as a refuge during battles. It was fiercely contested between the Maratha and Mughal powers; it later became a centre for Maratha administration in Kolhapur. Pawangad Fort is also included in the component part, and was built by Shivaji in 1673 on a steep rocky spur and separated by a ravine from Panhala.

Component part 12: Gingee Fort

Located in Tamil Nadu, at the crossroads of two important trade routes, Gingee Fort comprises three hillocks interconnected by a fortified wall. It included royal living structures, meeting halls, temples, mosques, granaries, water systems, and structures blending Dravidian and Maratha architectural styles with colonial elements. A Chola stronghold, it was constructed at the end of the 12th century, but in the 17th century it was fought over by the Golconda, Bijapur, and Maratha powers. It was captured by Shivaji's forces in 1677 and strengthened. It became a base for Maratha operations in Tamil Nadu, connecting northern and southern territories, but in 1698, it was taken by the Mughals and, in the mid-18th century, passed into the hands of the French, followed by the British.

Coastal and island forts

Component part 11: Sindhudurg

Built on the rocky Kurte Island, Sindhudurg is surrounded by a wall that follows the coastline. Constructed with local volcanic rock in 1664 by Shivaji, Sindhudurg became the headquarters of the Maratha navy. Its defences and hidden semi-circular entrance reflect strategies in maritime security. In 1746, it was taken by the Portuguese, but soon after, it was returned to the Kolhapur chief by the English.

Component part 08: Suvarnadurg

This island fort, located on a small island not far from the mainland, integrates maritime defence mechanisms with circular bastions and ramparts built with massive stone blocks. Built by the Bijapur Sultanate in the 16th century, Suvarnadurg was reinforced under Shivaji in 1660. It protected the Konkan coast and maritime trade and served as a Maratha naval base and shipbuilding yard.

Component part 04: Khanderi Fort

This island fort is located between the Bombay islands and Janjira. It includes bastions and fortified walls designed to control maritime routes near Bombay and Chaul ports. Constructed in 1679 by Shivaji, Khanderi Fort was part of the Maratha naval strategy against the British and Siddhis. It is considered to have played a crucial role in the expansion policy of the Marathas and countered

British dominance over commercial maritime routes. Its fortifications reflect the geopolitical tensions of the time.

Component part 10: Vijaydurg

A coastal fort located on a promontory by the estuary of the Vaghotan River, Vijaydurg includes triple-layered walls and a harbour, and exhibits an interchange in planning concepts and technological developments. Originally built by the Shilaharas, Shivaji expanded and repurposed it in the 17th century to serve as a naval stronghold. Its dock and fortifications contributed to Maratha naval activities in the 18th century. Archaeological research is likely to yield information on the history of this fort.

In the 18th century, after the deaths of Chhatrapati Shivaji Maharaj (1680) and of the Mughal Emperor Aurangzeb (1707), the Marathas significantly expanded their control over the Deccan plateau, along the Konkan coast and northwards in the Indian subcontinent, at the heart of the Mughal territory. Internal divisions within the Marathas and the superiority of European artillery ended the rule of the Marathas in the first decades of the 19th century.

As proposed in the nomination dossier and before changes were made to the boundaries, the original area of the twelve component parts totalled 735.81 ha, with eleven buffer zones totalling 234,988.35 ha.

Following the technical evaluation mission and the first additional information request, the area of the twelve component parts was modified. In response to the interim report, the State Party clarified that the area of the nominated component parts now totals 1,655.33 ha, with buffer zones totalling 96,830.12 ha.

The way the nomination has been configured raised various issues and ICOMOS sought clarification on different aspects throughout the evaluation procedure.

The nominated forts, named "primary forts" in the nomination dossier, are presented as nodes, or anchors, in a network of fortifications organised in clusters. In the cartography annexed to the nomination dossier, the nominated forts are surrounded by broad buffer zones, which include the immediate network of each primary fort, made up of "secondary" and "tertiary" forts, subsidiary structures, landform arrangements, hills, and forested areas, which all served defensive and territorial control purposes. Therefore, most of the elements in the nomination dossier identified as contributing to the value of the nominated component parts as "military landscapes" are located in their buffer zones.

ICOMOS observed that this approach in boundary delineation poses challenges regarding the feasibility of a nomination strategy for the property under the cultural landscape category.

In response, the State Party has expanded the boundaries of nine nominated component parts by including the

bedrock of the coastal forts and the hills on which the forts were built; in the case of Salher Fort and Lohagad (component parts 01 and 03), it also included the respective twin forts – Salota and Visapur – but did not include in the nominated component parts any of the secondary or tertiary forts in the buffer zones or other essential landscape features that would support the nomination under the category of cultural landscape.

Based on the description of the nominated forts and their historical development, ICOMOS found it unclear why some of the forts have been selected for inclusion in the series whilst others, among several built or reinforced by the Marathas, have not. Given the complex and interwoven history of Maharashtra and the polities that ruled over it, ICOMOS requested supplementary information on the geopolitical, historical, and social context of the emergence of the Marathas to better understand the rationale of the nomination and position the Maratha polity among contemporaneous polities at play in the area between the 17th and early 19th centuries. In October 2024, the State Party provided a concise complementary account of the historical conditions in which the Marathas rose to power and of the characteristics of the Maratha Kingdom.

The interim report sought further clarification on the historical context, the pattern of settlement and territorial control in the region immediately before the rise of the Marathas. The State Party elaborated on similarities between the Marathas and the Deccan Sultanates as well as on the Maratha specificities in administrative and military strategy. This additional information helped to place the origin of the Marathas in their relevant geo-cultural. historical and political context and clarified their long-lasting influence on the Deccan region and the destiny of the Mughal empire. The additional information also contributed to clarifying how the Maratha defensive system worked: the many forts in the Ghats and on the Konkan coast exhibited different strategic military scopes and roles. They worked in synergy to deploy their defensive and territorial control functions effectively.

State of conservation

The conservation approach by relevant responsible authorities involves carrying out works necessary to extend the life of the nominated component parts and avoiding unnecessary interventions, conjectural restorations or reconstructions of missing portions, unless the structural stability of the monument is at stake. Due to the rugged terrain in which they are located, interventions and regular maintenance of the nominated component parts presents significant challenges.

Substantial conservation works have been carried out at some of the nominated forts, i.e., Shivneri (02), Rajgad (06), Raigad (05), Sindhudurg (11), and Lohagad (03).

The main conservation problems for the nominated forts include structural stability of walls and structures, issues with rainwater drainage, vegetation growth, and pests in the hill forts. Forts on islands or along the coast suffer from

intense weathering caused by saline spray, wind, and mechanical action by sea waves.

The management plans of the nominated forts include conservation measures that will be essential to improve the state of conservation of the nominated forts.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is uneven among the fortifications and ranges from good to moderate, with concerns for localised damaged sections at some forts, i.e., Salher (01), Khanderi (04), Pratapgad (07), Suvarnadurg (08), Vijaydurg (10), and Sindhudurg (11).

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are landslides, weathering, vegetation growth, heavy rains and strong winds, which all contribute to localised structural failures and collapse of historic fabric. Some forts are exposed to direct anthropogenic factors, such as poorly planned or regulated human interventions, localised encroachment, pollution, and insufficient waste management.

Some interventions and infrastructures negatively impact heritage elements and attributes at some component parts. It is the case, for instance, for the National Highway 77 crossing Gingee Fort (12); the steel towers on the fortification walls and solar panels at Khanderi Fort (04): the ropeway, inappropriate recent buildings, electricity poles and pipeline at Raigad Fort (05); the concrete water tanks and filtering facility in the upper part of Shivneri Fort (02); modern interventions, including a tall steel tower, a water tank, several concrete buildings and the opening of a road connecting the inner and outer area of the nominated property cutting through the main fortification at Panhala (09): a steel tower on the fortification wall, an antenna and a concrete platform in Vijaydurg Fort (10); and buildings adjacent to the fort in its buffer zone and a steel lamp on the fortification wall at Sindhudurg (11). Potential development pressures at Pratapgad (07), being permanently inhabited, and a visitor facility under construction in its buffer zone adjacent to the nominated property, deserve careful consideration to avoid negative impacts. Similar attention should be paid to an inhabited area in the buffer zone of Suvarnadurg (08).

ICOMOS considers that solutions should be envisaged to remove as many of the structures that negatively affect the nominated property as possible, and that appropriate remedial or mitigation measures should be implemented to redress the above issues.

Most significant challenges seem concentrated at Gingee (12), Khanderi (04), Raigad (05), Shivneri (02), Panhala (09), Vijaydurg (10), Pratapgad (07) and Suvarnadurg (08).

In its response to the interim report, the State Party has provided evidence of its commitment to remediating and mitigating the negative impacts on some of the nominated component parts and to removing negatively affecting factors as rapidly and effectively as possible. An implementation calendar has also been prepared for remedial/mitigation measures. It is suggested that the implementation calendar for these remedial/mitigation measures be integrated into the action plans of the respective management plans.

It is also recommended that careful consideration be given to whether the ropeway built and functioning at Raigad (05) should be retained or if alternative means of access should be considered in the future. An assessment of its current potential impact on the attributes of the nominated component part, on its potential integrity and authenticity, is recommended, especially with a view to an increase in visitors due to the nomination process and before considering any possible upgrade.

ICOMOS considers that the state of conservation is uneven, from good to moderate, with more serious concerns at some nominated forts, and that factors affecting the nominated property are of both environmental - vegetation growth, heavy rains, landslides - and anthropogenic origin: development pressures, unplanned interventions and encroachment. Regular maintenance would be needed to counteract the first, and stronger regulations and effective management coordination would be needed for the second. The management plans of the individual component parts include arrays of measures necessary to improve the conservation status of the nominated forts. These may need to be supplemented by remedial measures for specific inappropriate interventions. The implementation calendar for remedial or mitigation actions is advised to be integrated into the respective management plans. A Heritage Impact Assessment of the existing ropeway at Raigad (05) is recommended, with a view to considering alternative accessibility methods in the future.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The selected component parts make up a series of forts and fortifications that were either captured, conceived, constructed, reconstructed or reinforced by Chhatrapati Shivaji Maharaj, the founder of Maratha rule, embodying his political and philosophical views.
- As the most representative sample of the several forts in the region, the nominated series tangibly illustrates military planning and architecture that strategically harnessed the topography, geography and

morphology of the region for defence purposes, and played a crucial role in the affirmation and expansion of Maratha rule between the 17th and the 19th century in the region.

 As a network of primary, secondary and subsidiary fortifications, structures and paths that skilfully used the topography, reliefs, forested areas, water resources, visual connections and other environmental features, the nominated series is deemed to have shaped this territory into exemplary Maratha Military Landscapes.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: different typologies of fortifications depending on their location and topography, strategic positioning on trade routes and Ghat passes, their role in the Maratha strategy of territorial control and continuity of use, integration of the stronghold with the landscape, planning, and architectural features representing Maratha defence techniques.

The proposed brief synthesis mentions a slightly different set of attributes, including strategic vision, geographical diversity, nuanced understanding of the terrain, innovative military design, defence planning, social inclusiveness, and deployment of military tactics. For this reason, ICOMOS requested in its interim report further explanation of how each component part reflects these attributes. The State Party replied by providing a consolidated table merging the different sets of attributes and an explanation of how each nominated fort would reflect the proposed attributes.

ICOMOS notes two fundamental issues in formulating the nominated series and defining the attributes supporting the proposed Outstanding Universal Value.

The first issue relates to the fact that most of the specific attributes that would support the nomination under the cultural landscape category remain outside the boundaries of the nominated component parts, even after the enlargement of the boundaries proposed by the State Party through their first submission of additional information in October 2024 and further confirmed through the February 2025 additional information. This challenges the possibility of considering the series as a cultural landscape. ICOMOS also notes that it is difficult to consider the nomination as a network of primary and subsidiary fortifications, as only primary forts, except for the three twin forts of Pawangad, Salota, and Visapur adjoining respectively Panhala (09), Salher (01), and Lohagad (03), have been included in the nominated series, whilst other supporting forts within the respective clusters are in the buffer zones.

The second issue relates to the fact that the nominated series appears to be based on a multiplicity of approaches, and particularly in association with the figure of Chhatrapati Shivaji Maharaj, who seems to be taken as a symbol of the affirmation and rule of the Marathas.

Whilst recognising the centrality of Shivaji in the rise to power of the Marathas, ICOMOS notes that various subsequent rulers and commanders played essential roles in expanding and affirming the rule of the Marathas after the death of Shivaji. The interim report raised issues regarding the biographical association of the nomination with Shivaji, as the October 2024 additional information seemed to confirm the biographical focus of the nomination. In February 2025, the State Party replied that the nomination was not based on biographical association with Shivaji.

ICOMOS acknowledges the responses of the State Party on this matter.

Finally, ICOMOS observes that, given the difficulty of considering the nominated serial property as a cultural landscape or a series of cultural landscapes, the name of the nominated property, "Maratha Military Landscapes of India", does not reflect the reality of the nominated property. ICOMOS also notes that many of the nominated forts cannot be related uniquely to the Marathas because their history covers a much longer time period, and they constitute the outcomes of several phases of construction, enlargement, and reinforcement.

Additionally, ICOMOS observes that the Marathas is a polity that was not found anywhere else other than in India; therefore, the specification "of India" is not needed and does not correspond to the reality of the nominated forts, which are all, with the exception of one, located in Maharashtra. Hence, ICOMOS considers that the name of the nominated property should be modified to exclude the reference to landscape and to India.

Comparative analysis

The comparative analysis has been developed on the basis of different parameters at the national, sub-regional, regional and international levels. It has examined properties that are inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

The first part of the comparative analysis addresses how the twelve component parts have been selected out of more than 390 forts in the region. The first selection led to the identification of sixty primary forts, which were further screened against two of the attributes: the fort typology, purpose and role in the narrative, and the strategic location or illustration of the defence strategy planning of the Marathas. This led to the retention of twenty-nine forts, which were further filtered through the lens of the attribute pertaining to exceptional defence and military architectural features and/or military landscape, resulting in the selection of the twelve retained forts. The contribution of each component part to the nominated series is also explored and reflected in a synoptic table, but the arguments presented therein are not straightforward and are unconvincing. Furthermore, the nomination dossier did not adequately develop the justification for the selection of the nominated component parts and the exclusion of other fortifications. In particular, no explanation was provided as to why the nominated series changed from the Tentative List one to the proposed current series, with elements removed and added (namely, Torna, Mulher, Rangana, Ankai-Tankai, Kasa and Alibag Forts have been expunged and Pratapgad (07), Panhala (09), Vijaydurg (10) and Gingee (12) Forts added). Therefore, ICOMOS requested clarification from the State Party on this matter in September 2024. In the October 2024 additional information, the State Party explained the rationale and principles behind the importance of fort building to Shivaji. Explanations were also presented about the strategic nature of the large-scale structure of the fort network, the role played by different forts in the vision of Shivaji, and the progressive expansion of the system. Finally, it was explained that Gingee Fort (12) was included as it would reflect the intention of Shivaji to extend his control over the Karnataka plains and the Coromandel coast on the east to obtain revenue from crops and port control. However, the additional information provided by the State Party in October 2024 did not address the reasons for changing the selected component parts from the Tentative List to the nominated series. Therefore, it remained unclear why certain nominated forts have been preferred to others already included in the Tentative List entry for this nomination.

For this reason, further explanation of the selection process was requested in the interim report. The State Party presented a list with more than 390 forts, identifying 266 as Maratha forts, grouped according to their location, their hierarchical function, and the scale of Maratha intervention in the forts. In addition, the State Party also provided an explanation of the role played by other primary forts in the Maratha history and the deployment of their expansion strategy. The additional explanations on the role played by other primary forts used, strengthened or built by the Marathas suggest that a number of these primary forts with their supporting clusters would also be strong candidates for inclusion in a nomination focused on the Maratha defensive system and their forts.

The State Party also explained that the rationale for the selection of the forts is based on the territorial boundaries of the Maratha Kingdom as of 1680, the year when Shivaji died, with its fortifications along the lines of defence on the Sahyadri Range and the Konkan coast. The nominated forts are the ones that anchored the network of fortifications which sustained the Maratha Kingdom from its inception under Shivaji through the Peshwa rule. These clarifications are helpful in ruling out the typological selection parameter; however, the selection of the component parts still does not appear clearly justified. In particular, Gingee Fort (12) does not appear to belong to the two lines of defence along the Sahyadri or the Konkan coast that define what was considered the Maratha heartland and best-known terrain by the Marathas.

Gingee Fort (12) predates the Marathas and Shivaji; it was captured by Shivaji but regained by the Mughals at the end of the 17th century after several years of siege. Furthermore, it does not seem to have functioned as part of a fortified network, as it is far away on the eastern side

of the Indian peninsula, where only a few forts were in the hands of the Marathas. Eventually, the Marathas gained and consolidated control over the northern and eastern territories of the Indian subcontinent rather than towards the southeast; therefore, the expansionistic vision of Shivaji was not achieved in the way he might have envisaged.

In the case of Shivneri (02), although Shivaji was born there and it is located in what is seen as the Maratha heartland, the fort was ceded to the Mughals when Shivaji was only a child. It was only returned to the Marathas in 1760, well after Shivaji's death and at a time when the expansionistic vision of the Marathas was mainly achieved. Hence, it did not play a prominent role in establishing or expanding the Maratha Kingdom, nor does it reflect the strategic vision of Shivaji or the distinctive architectural military planning of the Marathas.

Therefore, despite the assurances that the nomination is not focused on the association with the biographical figure of Shivaji, this association lingers on in the nomination and seems to at least underlie the selection of these two forts.

The comparative analysis at the national level discussed different traditions in developing fortifications and identified comparable traditions in the Rajput fortified architecture, in the Sultanate era, as well as some forts from the southern and northern areas. The conclusion is that only Maratha forts show a developed network of fortifications.

ICOMOS observes that many of the forts forming the Maratha defence network already existed, built by preexisting powers, including the Deccan Sultanates. In this regard, ICOMOS considers that the analysis could have explored in more depth the similarities, differences and specificities of territorial control strategies and the tangible legacy of other important powers that ruled the Indian peninsula, such as the Chola, the Chalukya, the Tughluq dynasties, or the Vijayanagara empire. This would have contributed to positioning the Maratha specificities more precisely within a broader context of rapid adaptation of fortifications in the Deccan to face the Mughal pressure and the technological advancements in European artillery. The region showed technological independence and Indian innovation in military architecture, but this is not limited to the Marathas. However, the networking strategies of the Marathas demonstrate a high-level reflection on the opportunities offered by the rugged terrain in which they operated, and this can be seen as a specificity compared to other fortification systems and military strategies within the national context.

In its interim report, ICOMOS requested further information on these aspects, and the State Party elaborated on similarities and differences between the Marathas and the other previous and contemporaneous polities. In particular, compared to the Muslim powers they served, the Marathas gave novel importance to maritime and coastal control and advanced guerrilla warfare to a higher level, which in turn required a dense network of

securely held forts that allowed for rapid retreat when needed. Organised in clusters comprising one or more primary, secondary forts and tertiary fortified posts, these forts controlled the territory and protected trade through the Ghats and along the Konkan coast. They demonstrate interconnected relationships both within and between clusters; collectively forming a large-scale fortified system arranged in terms of location and mutual positioning.

The comparison with World Heritage properties examines relevant properties in India, in the subregion, region, and globally. It examines properties through the lens of the qualities reflecting the chosen three cultural criteria.

The nominated series shares similarities with other properties already inscribed, or not, on the World Heritage List in how topography, physiography, and other natural resources have been harnessed for defence strategies. However, the specific conditions under which the defensive system of the Marathas developed and the role fortifications played in affirming the Maratha rule over a vast territory, with long-lasting implications for the history of the subcontinent, suggest that no such combination of values and attributes is yet represented on the World Heritage List.

However, although the additional information and the comparative analysis suggest that there is room on the World Heritage List for a series of fortifications reflecting the rise and flourishing of the Maratha Kingdom in the Indian subcontinent, the series as currently configured is not justified, as the component parts fall short of contributing to the proposed "Outstanding Universal Value of the nominated property as a whole in a substantial, scientific, readily defined and discernible way" (paragraph 137, Operational Guidelines for the Implementation of the World Heritage Convention). More importantly, the nominated component parts do not adequately reflect the ingenuity of a large-scale defensive system structured in a double line of defence along the Sahyadri Range and the Konkan coast and based on a dense network of forts with different functional hierarchy. which, organised into clusters, provided effective trade protection, territorial control and support to guerrilla warfare during a period of important socio-economic and geo-political changes in the history of India and South-Asia.

ICOMOS does not consider that the comparative analysis justifies consideration of the property for the World Heritage List as it is currently configured. However, ICOMOS considers that a nomination of a system of fortifications reflecting the knowledge of the Marathas and their territorial control strategies might justify consideration for the World Heritage List if the nominated series is substantially reconfigured by including secondary and tertiary forts supportive of the primary forts on the two main lines of defence in the Sahyadri Range, and along the Konkan coast, in order to reflect the intracluster and inter-cluster functional connection in the territorial control of the Marathas and the protection that supported their rise to power.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii), (iv) and (vi).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated series exemplifies the Maratha ideology of territorial control through architectural planning and strategic use of large-scale physiographic features of Maharashtra and the specific topographic conditions encountered. This is manifested in different architectural solutions, such as the articulation and construction of defensive perimeter walls rising on hilltops and slopes, temples, markets, etc. Although preceding powers and dynasties established the pattern of fortifications in the region, the nomination dossier argues that it was the Maratha regime, and Chhatrapati Shivaji Maharaj in particular, with his visionary political and governance philosophy and knowledge of the terrain, that made this network legible and expanded Maratha rule inland and along the Konkan coast. The capacity of Shivaji to harness the natural environment for warfare, territorial control and revenue collection is said to have impacted the landscape, society and culture of Maharashtra, which is still legible in tangible forms in the high density of forts and in a cultural legacy that continues to be celebrated today by local communities.

ICOMOS observes that the arguments used in the justification do not appear consistent with the wording of this criterion but seem more in line with the wording of criterion (iv).

ICOMOS notes that the nomination dossier tries to connect the territorial expansion, defence, and control strategy of the Marathas to ancient traditions and treatises. The description section also discusses ancient written sources and fortification typologies. However, it remains very difficult to trace the origins of the conception of these fortresses in those ancient texts and philosophies. It is also noted that the selected references to ancient sources appear to be rather general, based on common knowledge of military strategy, and could be applied to many fortifications.

Additionally, many of the forts in the nominated series preexisted the advent of Shivaji. Only three out of the twelve nominated forts were completely built by the Marathas; the others existed already and were more or less extensively adapted and reinforced by Shivaji or subsequent Maratha rulers. Hence, it is difficult for the whole series to epitomise only Maratha military planning, fort design and building traditions. The contribution of other cultural traditions to developing the Maratha fortification network cannot be overlooked, considering that the father and grandfather of Shivaji served under the Sultanates. Hence, the Bhonsle clan knew and was imbued with the military and administrative culture of the powers they worked for. Shivaji, in his pragmatism, put to good use what, from those traditions, appeared instrumental in achieving his project, be it fortifications, territorial, administrative, or fiscal arrangements.

ICOMOS, therefore, observes that the legibility of this system does not solely reflect the endeavours of Shivaji or of the Marathas, but is the outcome of a complex process and dynamic interplay of many factors, including state formation, military forces and structures, trade, past legacies, and interaction with and among competing powers.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

This criterion is justified by the State Party on the grounds that the nominated series represents an exceptional sample of the Maratha Military Landscapes of India, demonstrating the outstanding application of fort architecture, planning, design, technological development and military and governance strategies. The nominated serial property reflects the narrative of the rise and expansion of the Maratha Rule, led by the visionary and strategic capabilities of Chhatrapati Shivaji Maharaj to harness the geographic factors and the geopolitical and economic situation of the 17th to 19th centuries.

ICOMOS notes that not all nominated component parts are explicitly discussed in the argumentation for this criterion and how they contribute to reflecting its proposed justification. This weakens the case of the nominated series, in conjunction with overarching considerations about the configuration of the series presented in the comparative analysis and integrity sections. Furthermore, traditional human settlements, planned land uses, and commercial routes are, for the most part, not included in the nomination but only in the buffer zones.

ICOMOS further notes that the nominated series fails to support the arguments presented to demonstrate the proposed justification for this criterion. The nominated series does not include fortifications relevant to the expansion of the Marathas to the north and east of the Indian subcontinent. It includes fortifications that were not available to Shivaji or lost to competing powers, and could therefore only be partially seen as playing a role in the expansion of the Maratha rule. On the other hand, other primary forts discussed in the additional information provided by the State Party in February 2025, which could be seen as strong candidates for the nomination, are not included.

Also, the nomination dossier does not present a sufficiently detailed description and explanation of the architectural and technological innovations and qualities of the forts to support the case for the nominated series representing an outstanding example of an architectural or technological ensemble. To support the case of the nominated property as a cultural landscape, further

attributes should be presented inside the nominated component parts, accompanied by descriptions and explanations of how landscape features and processes were harnessed and shaped by the military and defence strategy deployed by the Marathas.

For these reasons, ICOMOS requested further information in its interim report. The State Party replied in February 2025 with additional descriptions and illustrations of the nominated forts. Although it complemented the nomination and proved very useful in the evaluation procedure, it does not suggest that the selected series of forts can be seen as an outstanding ensemble of forts or military architecture.

The considerable expansion of the boundaries of some of the nominated component parts led to the inclusion of essential features for the protection of the forts and the understanding of their relationship with the topography, but it is insufficient to see the nominated property as a cultural landscape or an ensemble of them.

However, the extensive additional information provided in February 2025 has shown that the Maratha developed an ingenious large-scale fortification system, the innovation of which resides in connecting the forts into one integrated defence system exploiting the topography and geomorphology. The Marathas relied on existing forts. built further strongholds, and interconnected them all in a dense network based on several forts with hierarchised territorial scopes and defensive functions grouped in clusters. This cluster-based fortified system provided territorial control and protection of trade through the Ghats and along the Konkan coast, giving the Marathas the advantage they needed to consolidate and expand their rule, given the dynamic forces at play, and historical, economic and geopolitical factors in the region throughout the 17th to early 19th centuries. This was a period of global and regional changes, with progressive colonial expansion in India and South-Asia, modifications of power relationships, weapons technology development, and socio-economic changes that also influenced the emergence and fall of the Marathas.

ICOMOS considers that this criterion is not demonstrated at this stage but might be if the nomination were substantially reconfigured and expanded to include further forts, especially secondary, tertiary and ancillary fortifications, currently only included in the buffer zones of each primary nominated fort, to illustrate the integrated functioning of the intra-cluster forts. Given the need to significantly increase the number and range of fortifications in order to offer an adequate representation of the vast territorial scope and multi-scale interconnections of the Maratha fortification system, ICOMOS advises to proceed with a phased approach to make the nomination feasible.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that the nominated series is tangibly associated with socio-cultural aspects and belief systems transmitted by the descendants and communities associated with Chhatrapati Shivaji Maharaj. The legacy of Shivaji is associated with several expressions, including art, literature, research, political strategies, governance principles (Hindavi Swarajya and decentralised administration), and environmental and cultural stewardship, favouring the integration of these sites into the life of the community.

ICOMOS observes that not all the component parts seem directly and tangibly associated with the above-mentioned traditions, ideas, or beliefs, and not all nominated forts present intangible manifestations of such association.

ICOMOS also notes that the ideas, principles, beliefs and socio-cultural aspects that have come to be associated with Chhatrapati Shivaji Maharaj may be significant in Maharashtra and, possibly, in India. However, seeing them as having outstanding and universal significance for all humankind is difficult. Finally, ICOMOS further considers that celebrating the association of the nominated property with a person who was a political ruler and still perceived as a military hero is out of the scope of criterion (vi) and does not reflect the spirit of the World Heritage Convention. In this regard, ICOMOS recalls that throughout the past fifty years of the implementation of the World Heritage Convention, the World Heritage Committee has consciously avoided the inscription of famous people (see, for example, the discussions and decisions of the 3rd session of the World Heritage Committee, Luxor, 1979) and the Operational Guidelines for the Implementation of the World Heritage Convention have been revised to reflect these decisions.

ICOMOS considers that criterion (vi) is not demonstrated.

The proposed attributes for the whole serial nomination include different typologies of fortifications depending on their location and topography, strategic positioning on trade routes and Ghat passes, their role in the Maratha strategy of territorial control and continuity of use, integration of the stronghold with the landscape, and planning and architectural features representing Maratha defence techniques. ICOMOS observes that these attributes characterise most fortifications and respond to common factors for fort planning; therefore, there is a need to clearly show how Maratha fortifications would outstandingly and specifically materialise these attributes. The specific features that would materialise these general attributes are presented in tabular form.

Despite the rich additional information provided, it remains unclear how these would make an outstanding and specific illustration of the general attributes of the proposed Outstanding Universal Value in all cases, and

whether the selected forts would make a strong case for each proposed attribute. The typology attribute appears particularly weak, as the nominated range seems limited vis-à-vis the declared fort typologies. The continuity of use by the Marathas is not proven for a number of forts which frequently changed hands, and the role in Maratha strategy, often related to battles or the location along trade routes, does not clarify in what ways they would have been strategic in the Maratha expansionistic vision.

However, the additional information reveals the exceptional density of forts of different size, scope and function, either conquered, built or reinforced in a relatively short time period and integrated into a network of fort clusters that harnessed the topography, the geography and other natural resources, such as water sources and vegetation to create an interconnected defensive system.

ICOMOS considers that any revised nomination will need to refine the attributes that would be capable of adequately reflecting the ingenious defensive system developed by the Marathas in their historic heartland between the 17th and the early 19th centuries.

ICOMOS does not consider that any of the proposed criteria have been justified at this stage. Criteria (iii) and (vi) are not demonstrated and do not seem to have potential for being justified. On the other hand, criterion (iv) might be justified by a substantially reconfigured serial nomination based on different arguments for justification that would focus more on the territorial system and the integration of the defensive functions of the various hierarchies of forts.

Integrity and authenticity

Integrity

The State Party argues that the nominated serial property captures in its integrity the development of Maratha ideology, vision, military planning and architecture. It comprehensively reflects the geo-historical territory of this military expansion project under the leadership of the Maratha rulers, creating an extensive military landscape across land and coast. Individually and collectively, the nominated forts form the most representative series reflecting the geographical, historical, social and architectural significance of the Maratha Military Landscapes of India. The nominated series and the component parts fulfil geo-chronological integrity, illustrating the interrelationships between physiography, location, design, and military operations, which are key aspects of the forts. Each fort contributes to the illustration of the proposed Outstanding Universal Value.

ICOMOS observes that the assessment of integrity focuses on the typical characteristics of fortifications and does not justify how, individually and collectively, as a series, the nominated component parts can demonstrate the conditions of integrity as cultural landscapes. However,

reference to the notion of a "military landscape" is made in relation to the integrity of the nominated series.

ICOMOS considers that essential attributes that might support the nomination strategy under the cultural landscape category are not included in the nominated component parts or discussed in the nomination dossier. The reference to forested areas, trails, and intervisibility does not suffice to justify this nomination as a cultural landscape. A deepened description and argumentation of socio-economic factors, land-use patterns, and utilisation would be needed, as well as the presentation of additional specific attributes — tangible features and processes — included within the nominated component parts.

ICOMOS notes that, as a serial nomination, integrity is also a measure of whether the component parts individually and collectively contain all the attributes necessary to express in a substantial way the proposed Outstanding Universal Value of the nominated property as a whole, and how each component part contributes to that value. Integrity is, furthermore, a measure of the intactness of the attributes.

ICOMOS observes that the nominated series does not provide a strong and consistent rationale for its current configuration. Too many disparate parameters seem to intervene in the selection of the component parts, which fall short of fulfilling them all or reflecting the selected attributes. Not all the proposed attributes seem relevant to properly reflect the distinctiveness of the Maratha defence system. as it emerges from the additional documentation provided by the State Party throughout the evaluation process. For instance, the categorisation of forts based on relationship with landforms, does not seem relevant to show the importance of each fort, which was related to their location along trade routes they were intended to protect, its relation to neighbouring secondary and tertiary forts as part of clusters and an overall defensive chain, and how it was supported by villages or settlements in the hinterland. Whilst this information has not succeeded in strengthening the case for the nominated series, it has clearly revealed that the Maratha system was highly complex, very extensive and strategically innovative in the way it used resources against larger states, such as the Mughals. Given these distinctive specificities, a nomination of only twelve primary forts, which does not include secondary and tertiary fortifications, cannot suffice to illustrate the scope of this strategic defensive network and how it functioned.

ICOMOS considers that the integrity of the whole nominated series has not been demonstrated at this stage, nor has it been for several component parts.

Since the limited selection of component parts and proposed attributes, which are not all included in the boundaries of the nominated property, do not seem to convincingly reflect the proposed Outstanding Universal Value, and since the criteria have not been demonstrated at this stage, integrity cannot be confirmed at this stage.

Only a much larger serial nomination, that would also include secondary and tertiary forts and other defensive

elements, would be able to reflect the ingenuity and vast territorial scope of this defensive system.

Authenticity

The nomination dossier informs that all nominated forts, except for one, are protected under national or state legislation, ensuring they are protected against vandalism, extreme damage and encroachment. Conservation works are carried out in line with international principles for good practice and use traditional materials and techniques as much as possible. Fort structures are largely intact, and construction can be ascribed to their builders, not to recent interventions. Layers of construction are generally undisturbed, archaeological remains are largely authentic, and their informative potential remains untapped as systematic archaeological excavations and research have been implemented only at some forts. Sources of information about the authenticity of the nominated forts include thorough architectural documentation, historical research and documentation international studies community engagement, national and international archives and libraries. These sources document conservation and management activities, form and design, materials, use and function, traditions, techniques and management systems, location and setting, spirit and feelings and intangible heritage dimensions.

ICOMOS observes that the configuration of the nominated series is not straightforward. It shows several shortcomings in its rationale, selection of component parts, and consistent expression of a clear and robust narrative. The general attributes defined for the whole series do not clearly relate to the explicit and implicit narrative; therefore, the nominated series does not credibly reflect the proposed Outstanding Universal Value through the defined set of attributes. Furthermore, the sources of information cited to prove the authenticity of the forts mostly include indirect documentary sources and do not consider direct tangible sources, such as specific attributes of the nominated component parts.

Therefore, whilst ICOMOS acknowledges the efforts made to document the authenticity of the nominated component parts as nationally or state-protected properties, ICOMOS does not consider that the nominated series and its component parts credibly reflect the proposed justification for Outstanding Universal Value through the selected component parts and corresponding general and specific attributes

In particular, the nominated forts cannot be seen as credibly reflecting Maratha "Military Landscapes", as essential landscape attributes remain outside the boundaries of the component parts of the nominated series. Nor could the nominated series be considered a credible reflection of the extensive defensive network developed by the Marathas, as only twelve strongholds out of many that still exist have been nominated and these are only primary forts. Hence, the nomination cannot reflect the functional interconnections among forts of a different hierarchy within their clusters and their contribution to the wider network.

ICOMOS notes that the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, and that identified attributes are not all relevant and do not credibly reflect the proposed Outstanding Universal Value. Moreover, the nominated series does not credibly reflect the innovation and distinctiveness of the Maratha defensive system. Therefore, authenticity cannot be confirmed at this stage.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have not been met at this stage.

Boundaries

According to the nomination dossier, the boundaries of the nominated component parts include the primary layer of defence and attributes demonstrating the skill and expertise of the Marathas in fortified architecture.

The buffer zones include elements aimed at representing the Maratha Military Landscapes; therefore, they include clusters of additional layers of defence systems formed by secondary and tertiary forts, forested areas, paths and trade routes and geomorphological formations contributing to illustrate how the Marathas harnessed topography and physiography in their military strategy.

The boundaries of the nominated series raise issues of different orders.

Firstly, ICOMOS regards the proposed delineation of the boundaries of the nominated component parts as highly problematic for a nomination strategy focusing on the cultural landscape category. Even with the proposed modifications, most potential landscape attributes would still remain outside the boundaries of the nominated property. Furthermore, the spatial boundaries of the nominated Maratha Military Landscapes are not clearly set out in terms of what they should cover for the functionality of the system as conceived by Shivaji or, later, by subsequent Maratha rulers.

Following the request for additional information and the technical evaluation mission, the State Party has revised the boundaries of the nominated component parts, expanding them considerably to include the immediate topographic features on which the forts are built; it included the additional twin forts adjoining Salher and Lohagad forts (component parts 01 and 03), namely Salota and Visapur forts. The delineation of the boundaries of the nominated component parts were confirmed in February 2025 by the State Party. However, secondary or tertiary forts were not added to the nominated series, nor were essential landscape attributes that might have conveyed the landscape dimension intended for the nominated property.

In addition, the configuration of the nominated series and the selected component parts was unconvincing and remains unresolved, despite the additional documentation and explanations provided. Additional information on archaeological research carried out in recent years at some of the forts indicates that underwater archaeological vestiges survive in the vicinity of the northern wall of Vijaydurg (component part 10). It would seem appropriate to include them within the boundaries of the nominated component part.

Despite the expansion of the boundaries of the nominated component parts, the size of the buffer zones seems to have been significantly reduced compared to what was presented in the nomination dossier, as indicated in the description section. Clarification on this reduction, however, is not explicitly presented in the additional information provided by the State Party. It would seem, however, that they have been redefined to include essentially the secondary, tertiary or other supporting fortifications of each cluster associated with each nominated component part.

Evaluation of the proposed justification for inscription

The nominated serial property aims to illustrate the Maratha military system, which allowed them to rise to power against pre-existing and often larger competing polities and empires. Through a collection of forts in Maharashtra and Tamil Nadu, the Marathas managed between the 17th and the 18th century to control most of the territory once under Mughal rule. The nomination has adopted a strategy based on the cultural landscape category to reflect the vast territorial reach of the Maratha defensive system. However, the nominated series does not include in its boundaries, even if these have been substantially enlarged throughout the nomination process, sufficient attributes capable of reflecting the tangible reality of a cultural landscape. The dossier also does not elaborate adequately on how the landscape elements were shaped by the presence and operation of the forts, and how the nominated property would reflect a combined work of humans and nature.

In addition, ICOMOS notes that throughout the nomination dossier, the nomination strategy swings between the idea of a cultural landscape and that of a network of fortifications that structured the territory on a large scale. This indecision is apparent in the description, the wording of the proposed justification of the selected criteria, the discussion of integrity and authenticity, and the rationale for boundary delineation. This lack of clarity in the nomination strategy has prevented the State Party from developing a coherent narrative and from identifying clear parameters and attributes for the configuration of the nominated series. This has led to an unconvincing selection of component parts which does not succeed in illustrating the sheer scale and complexity of the Maratha defence system, as it has emerged from the additional information and documentation provided by the State Party. The comparative analysis does not suggest that the nominated property, as it currently stands, deserves consideration for the World Heritage List.

However, ICOMOS considers that a substantially reconfigured nomination of a system of fortifications reflecting the knowledge of the Marathas and their territorial control strategies might justify consideration for

the World Heritage List. None of the proposed criteria has been justified at this stage, but criterion (iv) has the potential to be demonstrated should the series and the arguments be substantially revised to focus the justification on the territorial system and the integration of the defensive functions of the various hierarchies of forts.

Only a substantially reconfigured and expanded nomination can adequately illustrate the complex and extensive Maratha defensive system. Such a revised nomination should focus on the two main lines of defence in the Sahyadri Range and along the Konkan coast and include a hierarchical series of forts, including primary, secondary and tertiary forts now in the buffer zones, reflecting the ingenuity of the large-scale, territorial, defensive Maratha military strategy. Given the significant scale of the suggested revised nomination, ICOMOS advises adopting a phased approach by first nominating a revised series comprising at least some maritime and some hill forts with their respective secondary and tertiary fortifications. In this way, a complete picture of the intracluster and inter-cluster functional connections in the fortification network in deploying territorial control and protection of trade can be offered in the first phase of the nomination, securing conditions of integrity and authenticity. ICOMOS observes that, at this stage, the best candidates for such a first-phase nomination would include Khanderi Fort and Suvarnadurg along the Konkan coast (component parts 04 and 08), and Raigad, Raigad. and Pratapgad (component parts 06, 05 and 07), on the Sahvadri Range, with their secondary and tertiary forts, in their respective defensive clusters and buffer zones, as individual nominated component parts.

4 Conservation measures and monitoring

Documentation

The Archaeological Survey of India (ASI) and the Directorate of Archaeology and Museums, Government of Maharashtra have conducted the inventory of all nominated component parts, depending on their oversight responsibilities for the nominated forts. The annexes to the nomination dossier and submitted management plans of six forts include samples of the documentation developed for them. The nomination dossier informs that archaeological research and excavations have been systematically conducted only for some forts. The additional information assembled by the State Party in February 2025 provides an account of recent archaeological clearance works that have been carried out in 2025 at Salher Fort, Pratapgad, and Pawangad Fort (component parts 01, 07 and 09), and archaeological investigations implemented in recent years at Shivneri Fort, Raigad and Vijaydurg (component parts 02, 05 and 10). It is clear that all forts have archaeological potential that can yield important information on the historic development of the forts, the Marathas and the polities that built and used them.

ICOMOS observes that the sheer size and complexity of the nominated forts, including their difficult accessibility, make systematic documentation of all their elements challenging and lengthy. The remarkable documentation activities undertaken should be continued through the systematisation of surveys and investigations, the execution of systematic photographic documentation and geometric surveys, archaeological excavations, and information organisation into interoperable databases. Paper-based archives would benefit to be digitised as a risk-management measure.

ICOMOS notes that comprehensive records of conservation work have been presented only for the forts under the responsibility of the ASI. Undertaking regular records and documentation of works for all nominated forts would be important and is recommended.

Conservation measures

Conservation measures have been conducted at most of the nominated forts, but no major interventions have been carried out at Salher (01), Khanderi (04) and Suvarnadurg (08) Forts.

The national heritage protection system envisages two types of conservation programmes – the Annual Repair Plans, and the Special Repairs programme and the Revised Conservation Programmes. The first cover maintenance and upkeep necessities, are annually programmed, and must be completed within one year. The second concern special conservation works that are planned on a long-term basis and can last up to five years.

However, the management plans for the nominated forts include programmes for maintenance and conservation interventions that seem adequate to address conservation issues but need, in a few cases, urgent implementation. ICOMOS notes that no specific actions seem to be planned for the Pawangad Fort (in component part 09). As an element and attribute of the nominated series, it would be important to identify its conservation needs and related actions.

The main challenge for the nominated series is implementing regular maintenance, which is key for the historic structures to withstand the negative impacts of environmental factors. Programmed maintenance is crucial to ensure that conservation interventions already executed last longer and reduce the need for costly and logistically challenging works that might become almost impossible to implement.

Depending on accessibility to the forts and their architectural features, technical challenges, the complexity of the needed maintenance interventions, the engagement of local communities in cleaning, upkeep and basic maintenance programmes can be envisaged, and would be beneficial for strengthening the relationship between local communities and the forts. However, for most forts, there is a need for experienced practitioners and workers to conduct maintenance measures.

ICOMOS considers that operational plans should be supplemented with additional measures to remediate or, at least, mitigate the negative impacts of inappropriate infrastructure, construction, and structural additions within or adjacent to the nominated component parts.

Monitoring

The arrangements for implementing monitoring activities vary in relation to the managing authority.

For forts owned and managed by the ASI, a hierarchical technical-administrative system runs from national to site level. Regular monitoring is implemented at the site level. The ASI local office implements monthly monitoring activities, which could be more frequent as necessary. Monitoring and conservation works occur under the supervision of the ASI Superintending Archaeologist, who takes immediate decisions about sites under their responsibility and reports to the Regional Director and the ASI Director General.

For forts under State stewardship, the responsible agency is the Directorate of Archaeology and Museums, Government of Maharashtra.

The nomination dossier presents monitoring indicators that would record trends in the conservation of built structures and the landscape, risk management, tourism, and visitor management for the nominated component parts and in the buffer zones.

ICOMOS considers that documentation of the nominated property should be continued through the systematisation of surveys and investigations, systematic photographic documentation and geometric surveys, and archaeological excavations at the nominated forts and in their buffer zones. Information should be organised into interoperable for research, conservation and management purposes. Undertaking regular records and documentation of works for all nominated forts is important for maintenance and background documentation for research and any future work. ICOMOS also observes that regular upkeep and maintenance are crucial for the nominated component parts, to ensure that they withstand adverse environmental factors. In turn, substantial conservation interventions, logistically challenging due to the location of these fortified structures, could be reduced in frequency and, when implemented, their effects could last longer. ICOMOS considers that the monitoring system should be strengthened by developing indicators that monitor the state of conservation of the attributes.

5 Protection and management

Legal protection

An array of primary and secondary legislative instruments ensures the protection of the nominated component parts. At the national level, the pivotal document for legal protection is the Ancient Monument and Archaeological Sites and Remains Act 1958, amended in 2010 (AMASR 2010). It is complemented by the Ancient Monument and Archaeological Sites and Remains Rules (1959), by a National Conservation Policy (2014), and, at the

operational level, by the Archaeological Works Code and the Archaeological Conservation Manual. At the state level, the key law is the Maharashtra Ancient Monuments and Archaeological Sites and Remains Act, issued in 1960, supplemented by the Maharashtra Ancient Monuments and Archaeological Sites and Remains Rules (1962), and the Tamil Nadu Forest Act (1882).

The buffer zones are protected through the abovementioned legislation, additional rules and the Wildlife (Protection) Act (1972), at the national level, and by additional bylaws and rules applying to historic monuments, archaeological remains, forests and coastal protection.

Monuments designated at the national level under the AMASR 2010 enjoy a prohibited and a regulated area of at least 100- and 300-metre radius from the limits of the monuments, respectively. Certain impacting activities (such as building, mining, quarrying, excavating and blasting) are not allowed in the prohibited and regulated areas without permission from the Central Government, whilst other ones are permitted but with some restrictions, i.e., agricultural activities. The National Monument Authority (NMA) is competent to issue recommendations on any work to be implemented within the prohibited areas surrounding monuments. A different competent authority is designated by the Central Government in consultation with the State Government to issue No Objection Certificates (NOC) for interventions within regulated areas. The NMA has advisory power to state competent authorities. The implementing body for protection and conservation is the Local Office of the Superintending Archaeologist, the Archaeological Survey of India (ASI), Mumbai Circle.

Specific byelaws and rules for regulating the prohibited and regulated areas of the nominated component parts that are nationally protected have yet to be prepared.

The additional information submitted by the State Party in October 2024 presents the protection status of nominated forts and their buffer zones and supporting fortifications therein. Several secondary and tertiary forts are not protected under cultural heritage legislation but only under forest protection acts. In the case of the coastal or island forts, subsidiary fortifications fall partly under the protection regimes for coastal areas rather than heritage-specific legislation.

One of the twin forts included in component part 09 – Pawangad Fort – is protected at the state level but awaits finalisation of the legal protection designation at the national level. ICOMOS requested an update on the protection status in the interim report. The State Party replied that legal protection at the state level is in place under the Department of Archaeology and Museums.

ICOMOS observes that consideration should be given to protecting secondary and tertiary forts under cultural heritage-specific legislation, be it at the national or state level, to provide more adequate protection to key attributes illustrating the ingenuity of the Maratha defensive system, even if currently located in the buffer zones, and with a view

to reconfiguring the nominated property by including the subsidiary forts, now in the buffer zones, as component parts.

Relevant plans for the nominated property are listed in the nomination dossier and include conservation plans/ schemes, valorisation programmes, and management plans.

Management system

Legal and management instruments are in place to ensure the proper protection and conservation of each component part. On the other hand, since the nominated component parts fall under the responsibility of two different primary actors — eight under ASI and four under the Directorate of Archaeology and Museums, Government of Maharashtra — an overarching management framework is needed.

Therefore, a State Level Apex Advisory Committee has been envisaged to ensure coordinated and effective management of the nominated series across the two main management entities and different actors. Members of the Committee include the Chief Secretary of Maharashtra (Chair), the Principal Secretaries of relevant departments, ASI senior officials, Collectors of concerned districts, the Director of the Directorate of State Archaeology, and nongovernmental organisations. The Apex Advisory Committee guides the management of each fort, coordinates overarching initiatives, shares research, documentation, conservation and management practices and addresses interpretation strategies.

The Apex Advisory Committee is complemented and supported by District Level committees for implementing approved action plans. They are chaired by the Collectors of the relevant districts and include representation from the Superintending Archaeologist of ASI and the Deputy Director of the Directorate of State Archaeology, as well as local experts and non-governmental organisations.

An Overarching Policy Framework has been designed to guide management and interventions in all forts, which is based on the ICOFORT Charter, the National Conservation Policy and the Adnyapatra, a Royal Edict contemporary with Chhatrapati Shivaji Maharaj. The policy defines three strategic objectives, and three policies addressing the families of defined attributes that would convey the proposed Outstanding Universal Value.

Action Plans have been designed for each component part and are integrated into the Overarching Management Framework.

A management plan for each nominated fort was envisaged, and six were transmitted as annexes to the nomination dossier. In February 2025, the remaining six were transmitted in an abridged version. The management plans include a detailed description of each fort and its elements, an assessment of their state of conservation and hazards that might exacerbate risks, and the conservation and management needs, including technical infrastructure, visitors and interpretation. Some management plans

include risk management plans, and others integrate risk management considerations. They also include action plans with an implementation timeframe. Buffer zones are subject to protection designations and monitoring them is envisaged in the management system. However, it is not fully clear whether and how active protection and management mechanisms and measures are also in place for the buffer zones, as the management plans focus essentially on the nominated forts.

ICOMOS observes that these plans are clearly structured documents that, if equipped with adequate human, financial and technical resources for implementation, will contribute to the conservation and management of the nominated forts. Particular attention to newly planned infrastructure is necessary in order to ensure that they do not inadvertently impact the attributes of the nominated component parts and their immediate settings. Context-sensitive siting, architectural design, materials and finishing are important elements to be carefully weighed and assessed. Heritage Impact Assessments (HIA) of larger projects and an HIA approach to lesser interventions should be integrated into the management implementation mechanisms.

IUCN noted the inclusion of several forested areas within the boundaries of the buffer zones of the component parts, including biodiversity hotspots, sensitive habitats, and rare and endemic plant species that deserve attention in management of the property.

Visitor management

The nominated component parts represent important cultural tourism attractions for domestic and international visitors. Visitor facilities and infrastructure have been and are planned to be upgraded at all forts, according to presentation and promotion strategies developed by the two main management actors: the ASI and the Directorate of Archaeology and Museums, Government of Maharashtra.

ICOMOS notes that Policy Three of the Overarching Management Framework focuses on the associational value of the nominated series with Chhatrapati Shivaji Maharaj. ICOMOS underlines that the association with a person is out of the scope of the application of the World Heritage Convention. Therefore, any interpretation strategy promoting the nominated series as potentially having Outstanding Universal Value for its association with Shivaji should be avoided. Careful management is necessary to ensure that associations with local or national significance are not presented as having outstanding universal significance to local, national or international audiences.

ICOMOS further notes that all proposed or planned facilities for visitor management included in the management plans for individual fortifications should be carefully assessed in terms of potential negative direct and indirect impacts that they may cause to attributes supporting their significance and heritage qualities.

Community involvement

Local communities have deep traditional family ties with the fortifications and their surrounding territories and settlements. Generational continuity with communities contemporary with the Marathas can be recognised through the persistence of names. Therefore, the strong connection of these communities with the nominated forts represents an important asset both for their sustenance and the transmission of the tangible heritage of the fortifications. Several non-governmental organisations contribute to the upkeep, maintenance and conservation of the forts, through a variety of activities.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated forts is adequate. However, not all the secondary, tertiary or subsidiary forts included in the buffer zones are protected according to cultural-heritage-specific legislation. Given their contribution to reflecting the ingenuity of the Maratha defensive system and, therefore, important attributes that convey interconnectedness among forts within the clusters, they should be protected at the state or national level according to the relevant cultural heritage acts. The management system is clearly articulated, and respective competencies appear set out in the relevant legislation and institutional organisation at the national and state levels. Ensuring communication and coordination among all responsible actors is essential for effective implementation of protection and management. The management plans include necessary measures for the long-term sustenance of the heritage significance of the nominated forts and their implementation is key for management effectiveness. The management of the buffer zones could be strengthened, and existing or planned management mechanisms and measures could be more explicitly integrated into the management plans. These plans form a sound basis for the elaboration of the management plans for any revised nomination that the State Party may wish to bring forward.

ICOMOS considers that local communities should continue and sustain their involvement in the upkeep and management of the nominated component parts, as this would strengthen their connections with the forts and improve the overall sustainability of their management.

6 Conclusion

The Maratha Military Landscapes of India is a serial nomination that aims to illustrate the Maratha military system, which allowed the Marathas to rise to power against pre-existing and often larger competing polities and empires. Between the 17th and the 18th century, the Marathas managed to control most of the territory once under Mughal rule.

The State Party deserves praise for undertaking such a challenging nomination that reflects an important historical period for the Indian subcontinent in terms of

geopolitical and socio-economic changes, military technology advancements, and complex themes such as state formation, large-scale territorial defensive control, and military strategy.

The proposed nomination strategy is based on the cultural landscape category and aims to reflect the vast territorial reach of the Maratha defensive system. However, in the nomination dossier, the focus swings between the idea of a cultural landscape and that of a territorial system or network of fortifications that structured the territory on a large scale. This indecision can be traced in the description, the wording of the proposed justification of the selected criteria, the discussion of integrity and authenticity, and the rationale for boundary delineation. This lack of clarity has not assisted the State Party in developing a coherent narrative for the nomination, which partly revolves around the figure of Chhatrapati Shivaji Maharaj, the founder of the Maratha Kingdom. The nomination narrative evokes the rise, development and fall of the Marathas up until the early 19th century, and is partly based on the diverse range of Maratha fortifications. This has led to an unconvincing selection of component parts, comprising twelve forts surrounded by vast buffer zones, which include several subsidiary fortifications and large hilly landscape expanses. Most of the natural and human-made landscape elements and attributes that would reflect a cultural landscape category nomination are not included in the nominated component parts but only in the buffer zones. Even the significant enlargement of several component parts could not overcome this problem. Whilst the rationale for the landscape category choice was clear, the nominated serial property, as configured, cannot be considered under the cultural landscape category.

The State Party has provided extensive additional information that has not strengthened the case for the current nomination but has shed light on the sheer scale and complexity of the Maratha defence system, which did not emerge from the nomination dossier. As a series of sites and monuments, the nominated property as presented has not demonstrated potential for being included in the World Heritage List through the comparative analysis; nor can the current nominated serial property demonstrate the proposed criteria.

In summary, whilst ICOMOS considers that the current nominated series does not succeed in adequately illustrating the complex and extensive Maratha defensive system, a substantially reconfigured and expanded nomination could achieve that. The additional information provided by the State Party gives grounds for a possible way forward. Such a revised nomination should focus on a hierarchical series of forts that reflects the complexity and ingenuity of the large-scale, territorial, defensive Maratha military strategy and its specific characteristics. To properly reflect the extensive Maratha defensive system, which provided territorial control and protection, supporting their rapid rise to power, the revised nomination should focus on the two main lines of defence in the Sahyadri Range and along the Konkan coast, and

include primary forts as well as the secondary and tertiary forts currently in the buffer zones and supportive of the primary forts. Such a reconfigured nomination could reflect more effectively the knowledge of the Marathas and their territorial control strategies. It may justify consideration for the World Heritage List under a revised justification for criterion (iv) that would focus more on the territorial system and the integration of the defensive functions of the various hierarchies of forts.

Given the significant scale of the suggested revised nomination, ICOMOS advises adopting a phased approach by proposing, as a first step, a revised nominated series comprised of at least some coastal and some hill forts with their respective secondary and tertiary fortifications. This would offer a more complete picture of the functional connections of the fortification network in deploying territorial control and protection of trade, and would secure the conditions of integrity and authenticity. In ICOMOS' view, the most appropriate candidates for this first-phase nomination are Khanderi Fort and Suvarnadurg (component parts 04 and 08) along the Konkan coast, as well as Rajgad, Rajgad, and Pratapgad (component parts 06, 05 and 07), on the Sahyadri Range, along with their secondary and tertiary forts, in their respective defensive clusters and buffer zones, as individual nominated component parts.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the examination of the nomination of the Maratha Military Landscapes of India, India, to the World Heritage List be **deferred** in order to allow the State Party, with the advice of ICOMOS and the World Heritage Centre, if requested, to:

- Refocus the current nomination around a hierarchical series of forts that reflects the complexity and ingenuity of the large-scale, territorial, defensive Maratha military strategy and its specific characteristics,
- Given the sheer scope of the military system developed by the Marathas with its double line of defences, interconnected network of larger fortifications and smaller forts and outposts, which effectively provided territorial control and trade protection along the Western Ghats and the Konkan Coast, adopt a phased approach by proposing a twophase serial nomination: the first phase should include selected fort clusters along the two defence lines on the Konkan Coast, the Sahyadri Range and Western Ghats; the second phase should constitute a significant boundary modification to the series through the addition of further fort clusters along the same defence lines to fully reflect the density, hierarchy and strategic locations of fortifications along both defence lines.

 Re-frame the current nomination as the first submission of the extended series by focusing on representative clusters of coastal forts, including Khanderi Fort and Suvarnadurg, with their supporting forts, backed up by representative clusters of hill forts, including Raigad, Rajgad and Pratapgad, with both clusters including as separate component parts their supportive secondary and tertiary forts currently included in the buffer zones,

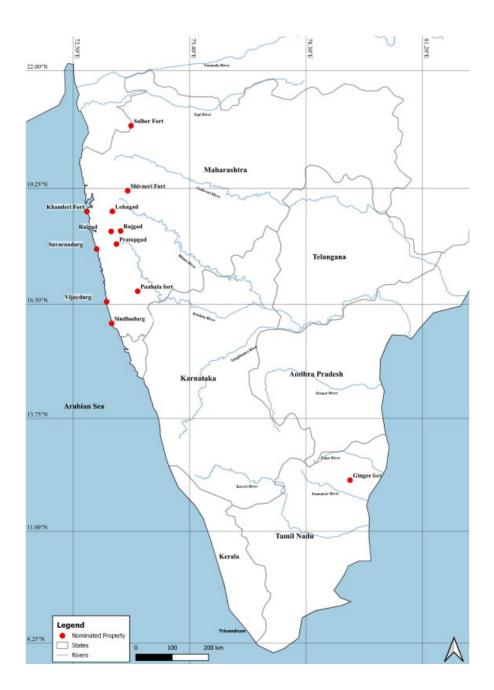
Any revised nomination should be visited by a mission onsite.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Protecting the secondary and tertiary forts in the buffer zones of the nominated component parts with cultural-heritage-specific designations,
- b) Integrating the proposed implementation calendars for remedial or mitigation measures into the respective management plans of forts affected by adverse impacts of past inappropriate developments,
- c) Preparing a Heritage Impact Assessment on the existing ropeway at Raigad as a basis for considering alternative means of accessibility in the future and for any project that may have an impact on the nominated forts and their relationship with their historic setting,
- d) Continuing with the documentation activity through its systematisation and integration into interoperable GIS for research, conservation and risk management purposes,
- e) Undertaking regular upkeep and maintenance of the fort structures to delay the need for extensive and complex conservation interventions and ensure recent interventions last longer,
- f) Strengthening the management of the buffer zones and more explicitly incorporating existing or planned management mechanisms and measures into the management plans.

ICOMOS recommends that the name of the future nomination be changed to: "Maratha Military Defence System", as the Maratha polity was not found anywhere else other than in India and to reflect the reality of what the site was.



Map showing the location of the nominated component parts

Prehistoric Caves and Falak-ol-Aflak Ensemble (Islamic Republic of Iran) No 1744

1 Basic information

Official name as proposed by the State Party

Prehistoric Caves and Falak-ol-Aflak Ensemble of Khorramabad Valley (PCFEKV)

Location

Lorestan Province Islamic Republic of Iran

Brief description

The prehistoric sites of the Khorramabad Valley comprise five caves and one rock shelter scattered in this long and narrow ecological and climatic corridor, and which acted as a strategic communication artery. The abundant water resources, karst caves and rock shelters, rich fauna and flora, and the relatively mild climate have attracted human settlements as far back as 63.000 years ago. The prehistoric caves and rock shelters, of which the full academic potential has yet to be fully explored, already provide outstanding material evidence of Mousterian and Baradostian cultures ranging from the Middle to the Upper Palaeolithic, shedding light on early human evolution in the region and dispersal route from Africa into Eurasia. The decorative objects, both locally produced and sourced from a long distance, together with the advanced stone tool industry, bear witness to the human cognitive and technological development of the Baradostians in the Zagros Mountain Range and the world.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of six *sites*, one *group of buildings*, and one *monument*.

Included in the Tentative List

9 August 2007 as "Khorramabad Valley"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated series from 6 to 12 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the description, the nomination strategy, boundaries, legal protection, conservation principles and standards, the management plan, the tourism plan, and clarification on three other issues.

Additional information was received from the State Party on 3 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the justification for inscription - proposed narratives, the chronology, the comparative analysis, academic potential and future research, and tourism management.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Khorramabad Valley is a long, narrow karstic valley, located in the Central Zagros Mountain Range in western Iran. It has been shaped by the tectonic processes of the orogenic activity of the Zagros, and is part of the Khorramabad catchment basin. Abundant water resources, karstic caves and rock shelters have created favourable conditions for the fauna and flora of the region, contributing to the development of human settlements from prehistoric times to the present day.

The nominated series comprises eight component parts, including five prehistoric caves, one prehistoric rock shelter, one architectural ensemble, and one historical bridge.

Component part 1: Kaldar Cave

Located in the north of the Khorramabad Valley, a test pit in the cave exposed a five-level stratified deposit, covering archaeological material from the Islamic, Historical, Chalcolithic, Neolithic, including the Pre-pottery Neolithic, Epipaleolithic, Upper Palaeolithic, and Middle Palaeolithic periods. Further excavation of the wider area revealed five layers of deposit, dating from the Islamic and Historical eras, Iron Age, Bronze Age, Chalcolithic,

Neolithic, as well as the Upper and Early Upper Palaeolithic, and Middle Palaeolithic periods. The Upper Palaeolithic layer with several chronometric dates provides evidence for both the Middle Palaeolithic (typically associated with Neanderthals) and Upper Palaeolithic (generally associated with anatomically modern humans) raising questions about the transition between these two periods in the Zagros region. The faunal remains shed light on the climatic change in the region, which led to shifts between dry-steppe and wooded environmental conditions in the Palaeolithic period.

Component part 2: Ghamari Cave

This component part, located in the northwest of the Khorramabad Valley, comprises the Ghamari Cave and Pa Sangar Rock-Shelter. A test pit at Ghamari Cave revealed five levels of deposits covering the Middle and Upper Palaeolithic, Neolithic, Chalcolithic, Bronze Age and Islamic periods. The artefacts discovered include stone tools such as Levallois by-products, limace points, and side-scrapers, fractured, retouched, and unmodified blades, pointed flakes, and potsherds. A large number of faunal remains were also recovered from the cave.

At the Pa Sangar Rock-Shelter, artefacts such as lithic artefacts and faunal remains were found, indicating that the Zarzian culture originated from the Baradostian. The discovery of two large scallop shells suggested a long-distance trade, or less likely migrations, with the Persian Gulf.

Component part 3: Gilvaran Cave

This is a shallow cave situated in the northwestern limestone ridges of the Khorramabad Valley. In 2002 and 2004, 357 Baradostian culture lithic artefacts were found in the cave, dating to the Upper Palaeolithic. A later excavation yielded significant Palaeolithic cultural remains. Mousterian points and flakes, manufactured using the Levallois technique, were found in Sub-Level 2, suggesting a different occupation compared to other sites of the Khorramabad Valley. Animal species were identified from the faunal remains. In front of the Gilvaran Cave, a sondage pit testifies to the existence of a multilayered agricultural society dating to the Islamic, Bronze Age, Chalcolithic and Neolithic periods.

Component part 4: Yafteh Cave

Located about thirteen kilometres to the west of Khorramabad, this component part comprises three elements: the Yafteh Cave, the Gachi Rock Shelter and Sorkh-e Lizeh Rock Shelter. The cave contains Baradostian materials, dating between 29,000 and 40,000 BP. A new excavation suggests a possibility of the intermediate chronological position of the Baradostian or Zagros Aurignacian in the Southwest Asian Early Upper Palaeolithic sequence, which may overlap with the Ahmarian and predate most of the Levantine Aurignacian. However, a more recent analysis of 2005-2008 of the Yafteh lithic assemblages combined with stratigraphical

interpretations and information derived from other archaeological materials suggested a three-cultural-phase model for the Yafteh sequence. The evidence of personal ornaments, bone tools, and frequent use of ochre and other minerals throughout the Baradostian sequence, is completely absent in the Middle Palaeolithic of the Zagros region. This suggests a considerable cultural difference between the behavioural patterns of the Middle and Upper Palaeolithic hunter-gatherers in the Zagros region, showing stronger affinities with what is known about the Aurignacian from Europe and the Near East. Faunal samples indicate that the human subsistence in Yafteh relied mainly on small herbivores.

The Gachi Rock Shelter offers six side-scrapers (single, double, and convergent), one Mousterian point, and one exhausted disk core, and the Sorkh-e Lizeh Rock Shelter exhibits some generic Early Upper Palaeolithic characteristics, but they occur along with lamellar elements and even bullet cores, which are one of the characteristics of the Neolithic period.

Component part 5: Kunji Cave

Located to the south of the city of Khorramabad City, the cave contains a sequence of deposits from the Holocene and Late Pleistocene periods, which are divided into twelve natural stratigraphic levels and three main units. Unit 1 revealed a cobble wall foundation and artefacts dating mostly to the Holocene; Unit 2 is known as the "Main Component of the Mousterian"; while Unit 3 comprises Late Pleistocene sediments. Later excavations recovered 2,713 lithic artefacts, marked by the intense lithic reduction and exhaustive use of raw material, which surpasses that of the majority of Middle Palaeolithic assemblages documented elsewhere in the Zagros region. A complex of tombs contains the remains of more than twenty individuals, and over thirty partially or completely restorable vessels. The absolute age of the tombs remains uncertain. Animal bone fragments were also found.

Component part 6: Gar Arjeneh Rock Shelter

Located in the southern region of the Khorramabad Valley, the rock shelter is the place where evidence of lithic industry dating to the Mousterian and Baradostian cultures were found. The lithic assemblage has revealed a significant proportion of side-scrapers produced through the utilisation of the Levallois technique and modified bladelets. Faunal remains were found at the site.

The Zagros Mountain Range was a key route for Homo Sapiens migrating out of Africa into Eurasia. The nominated caves and rock shelters manifest a long sequence of human occupation and interaction with the changing environment. The artefacts found at these sites bear witness to the human settlements in the region that appeared as early as the Middle Palaeolithic, when Homo sapiens coexisted with, and eventually replaced, the Neanderthals. The stratified cave and rock shelter sequences provide evidence of past human settlements with significant Baradostian complexes, as attested by the

combination of diverse symbolic artefacts and the evolution of the lithic industry.

Archaeological investigations relating to the prehistoric caves in the nominated series began in 1950, when pioneering research was carried out in the area and a test pit was dug in Kunji Cave. As the findings were encouraging, an extensive and systematic survey of prehistoric sites was undertaken in 1963. Seventeen caves and rock shelters were identified and excavations were conducted at the Kunji Cave and Gar Arjeneh Rock Shelter. Excavations continued at the Ghamari Cave, the Pa Sangar Rock Shelter and the Yafteh Cave in 1965. Based on these excavations, three types of settlements have been identified for the Palaeolithic and Epipaleolithic periods in the Khorramabad Valley: seasonal camps, hunting and butchery sites, and temporary sites. In 1969, Kunji Cave was excavated again. In 2001, another survey of the Khorramabad Valley identified twenty-one caves and rock shelters relating to the Middle Palaeolithic, Upper Palaeolithic, and Epipaleolithic periods. Further excavations were undertaken between 2005 and 2015.

Component part 7: Falak-ol-Aflak Ensemble

Commonly known as the Shapour (Shapur or Shapuri) Khast Castle, the ensemble is located at the narrowest part of the valley. It comprises eight elements, including the hill, the Falak-ol-Aflak Castle, Bashgah-e Afsaran (Officers Club), the Dezhbani Building (former Commercial Bank), Sarbaz-khaneh 1 (Barracks 1), Sarbaz-khaneh 2 (Barracks 2), the Gap Bridge, and the Haji Ali Asghar Khorram Abadi Bridge.

The hill is a rock outcrop serving as the foundation of the castle. The Falak-ol-Aflak Castle, perched on top of the hill with its panoramic views over the Khorramabad Valley, has an irregular octagonal plan, two courtyards, eight towers, and four underground conduits for emergency escape. The castle was essentially for defence purposes, but was later used as the Government Treasury in the 10th century, the Government Seat of the Atabakan rulers and governors of the Safavid to the Qajar Dynasties, and finally a "military" barracks in the first and second Pahlavi periods. It was subsequently transformed into a museum complex. The Gap Bridge is located to the north of the castle over the Gelal River, connecting the east and west parts of the city; while the Haji Ali Asghar Khorram Abadi Bridge is a stone bridge located south of the castle.

The hill has been occupied possibly since the Middle Palaeolithic, while the mud-brick fortress atop the hill dates back to the Iron Age. These architectural remains were continuously used and expanded into the current form in subsequent eras. The Gap Bridge was built when the city of Shapour was moved to its current location during the Safavid period. The historical structure of the bridge has undergone extensive repairs and restorations. The Haji Ali Asghar Khorram Abadi Bridge was constructed in 1953.

Component part 8: Shekaste Bridge (Shapouri Bridge)

No longer functional, the bridge is preserved in a public park. Its remains include twenty-seven piers, five arches and parts of the abutment of the stone structure. They are attributed to both the Sassanid period and the early Islamic period. Its construction was linked to the establishment of Shapour Khast City.

The area of the eight component parts as proposed in the nomination dossier totals 414.7 ha, with buffer zones totalling 7,103.88 ha.

ICOMOS considers that the nominated prehistoric caves and the rock shelters span a period from approximately 63,000 to 3,000 BCE. While the general timeline of human occupation has been established, many gaps remain. In the additional information received in February 2025, the State Party provided two chronological tables with all the dates of the artefacts excavated from the nominated archaeological sites, which helped ICOMOS to better understand the levels of development that have been reached at any particular time period.

State of conservation

The state of conservation of the prehistoric caves and rock shelters (component parts 1 to 6) is overall stable. There are no disturbances to the archaeological deposits. Archaeological excavation activities are allowed upon permission. The excavated parts within the caves have been backfilled, and protected with wooden walkways. Graffiti have been found in some of the caves in the past; however, safety and security measures are in place now to prevent human-induced damage. Furthermore, visitors must be accompanied by a guide while onsite. The natural environments, geomorphological features, natural habitats, and visual integrity of the prehistoric caves and rock shelters have been well preserved. The sondage pit in front of the Gilvaran Cave (component part 3) is exposed to the elements, and needs to be protected.

Major conservation campaigns were conducted at the Falak-ol-Aflak Ensemble (component part 7) between1979 and 2023. These interventions included the removal of added structures, consolidation of foundations, structural reinforcement, water tightening, repair and restoration of arches, roofs and gutters, grouting, pointing, plastering, installing lightning-proof facilities, and cleaning. The Gap Bridge was repaired and restored between 1920-1923, in the Pahlavi Era, and in 2009, including surface cleaning, replacing damaged sections, and reinforcing the bridge structure.

Documentation and conservation interventions were conducted in 2008-2010 at the Shekaste Bridge (component part 8), including restoring and repairing the arches, starlings, and carved stones. Currently, the bridge is preserved in a public park with a miniature model showing the original design.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation

mission, ICOMOS considers that the state of conservation of the nominated property is overall good. The sondage pit in front of the Gilvaran Cave (component part 3) should be protected.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressure, moisture in the historical buildings, natural disasters, and tourism.

The development pressure includes urban expansion, air pollution due to traffic surrounding the Falak-ol-Aflak Ensemble (component part 7), and farming and animal husbandry in the buffer zones of the prehistoric caves and rock shelters (component parts 1 to 6). City expansion may also pose a threat to these buffer zones. The current legal provisions conferred to the buffer zones are adequate to control development in the area. Farming and animal husbandry activities are limited and are well controlled by the cultural and natural conservation authorities. Proposals have been made to control the traffic.

The rising damp due to high ground water levels is a threat to historical buildings. To mitigate this impact, ventilation holes in the buildings are proposed to reduce moisture.

Earthquakes are a potential threat to all historical structures. Reinforcement of historical buildings and construction has been conducted to improve the resilience of the nominated property. Flooding is also a prominent threat to the historical bridges. A part of the Gap Bridge (in component part 7) was damaged by the 2018 flood. Regular dredging has been incorporated into the work programme of the Lorestan Regional Water Organisation to reduce the flooding hazard.

Tourism does not pose threats to the prehistoric caves and rock shelters (component parts 1 to 6). The Falak-ol-Aflak Ensemble (component part 7) is the most visited site in the city. Measures for reducing the number of visitors include limiting the number of tourists to the museums, diverting visitors to other places, and prolonging the opening hours.

ICOMOS considers that the state of conservation is overall good and that factors affecting the nominated series are overall controlled. However, the exposed sondage pit in front of the Gilvaran Cave (component part 3) should be protected.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated series is a remarkable cultural sequence from the Middle Palaeolithic period through to the Bronze Age and down to the present day. It reflects the Baradostian and Zarzian cultures, and provides insight into human evolution from the time of the Neanderthals until the present day.
- The nominated series is an outstanding manifestation of interactions between humans and their environment in the karstic landscape, a testament to the enduring presence of humans in the valley for 63,000 years until contemporary times.
- The exceptional architectural design of the castle complex encompasses hydraulic systems, gardens, earthquake resistance, and an almost impenetrable military-governmental fortification on the highest central point of the valley with an exceptional view over the entire area.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the prehistoric caves and rock shelters, their natural setting, including the biological and geological features, and the Falak-ol-Aflak Ensemble and the Shekaste Bridge with their strategic locations and architectural merits.

The nomination dossier is based on a narrative presenting the continuous human occupation of the valley. However, the component parts do not relate to the same sets of values and historical periods: the prehistoric caves and rock shelters (component parts 1 to 6), relate to the Palaeolithic layer of human occupation, whilst the other, comprising the Falak-ol-Aflak Ensemble and the Shekaste Bridge (component parts 7 and 8), to a much later phase. ICOMOS considers that this nomination strategy does not meet the requirements for serial nominations as stipulated by paragraph 137 of the Operational Guidelines for the Implementation of the World Heritage Convention which prescribes that the selected component parts should "reflect cultural, social or functional links over time".

In the additional information submitted in November 2024, the State Party proposed a revised narrative centred on the continuity of the human occupation in the valley for over 63,000 years. The State Party argues that the link between the two groups of component parts is demonstrated by the archaeological remains that can be found in each group, the dating of which seems to indicate overlapping periods. In particular, the burial site of the Kunji Cave (component part 5) dates back to the 3rd millennium BCE, while the Falak-ol-Aflak Ensemble (component part 7) testifies to continuing human occupation since the 5th millennium BCE. This evidence

would illustrate the transitional period when human societies moved from the caves to the valley. Based on this narrative, the Falak-ol-Aflak Ensemble (component part 7) would no longer be part of the nominated series for its architectural merits but for its archaeological values.

ICOMOS does not consider that a long and continuous human occupation of a place automatically warrants a property being of an outstanding nature, since this is a common phenomenon worldwide. Furthermore, it is difficult to describe human evolution through a chronological sequence spanning several thousand years, as there are many different phases of this evolution in the valley. Finally, not all of the component parts selected are adequate to illustrate the entire period of human occupation presented.

On this basis, ICOMOS noted in its interim report that the prehistoric caves and rock shelters (component parts 1 to 6) do provide valuable and chronologically coherent information about human dispersal, evolution, social behaviour, adaptation strategy, subsistence, tool making, and other aspects of the development of the prehistoric communities in the region. ICOMOS considers that these component parts together have the potential to meet the requirements for Outstanding Universal Value under a thoroughly revised narrative and reconfigured series.

In the additional information of February 2025, the State Party proposed a revised narrative centred on component parts 1 to 6, focusing on the outstanding universal significance of the prehistoric caves and rock shelters rather than the long-term human occupation, which was supported by a detailed comparative analysis. The State Party argues that the density of the Upper Palaeolithic sites as well as the rich and distinctive evidence of Baradostian cultural practices have made the archaeological sites of the Khorramabad Valley stand out as unparalleled locations for examining the behavioural patterns of Upper Palaeolithic societies, especially those linked to the Baradostian culture, on a global scale.

ICOMOS notes that the mound beneath the Falak-ol-Aflak Castle (located in component part 7) is still included in this revised narrative on the basis that lithic tools, possibly dating to the Middle Palaeolithic, have been found in this location during the scientific appraisal of the archaeological potential of the rock shelters carried out in 2023-2024. It is also assumed by the State Party that its strategic location offered favourable settlement conditions to the prehistoric communities.

ICOMOS considers that the revised narrative, as presented in the additional information of February 2025, is appropriate, and that the prehistoric sites located within the nominated component parts 1 to 6 have the potential to justify Outstanding Universal Value. However, ICOMOS considers that the archaeological potential of the Falak-ol-Aflak mound has yet to be established. Indeed, as scientific research has only just begun there, its contribution to the potential Outstanding Universal Value cannot be firmly demonstrated at this stage.

Therefore, ICOMOS considers that the Falak-ol-Aflak mound should not be included as part of the reduced series. Nonetheless, the State Party could at a later stage consider including the mound in the nominated series through a minor boundary modification request, should further archaeological and scientific research uncover more significant tangible evidence dating from the Upper Palaeolithic period, and should this contribute to the potential Outstanding Universal Value of the proposed reduced series.

ICOMOS finally considers that the name of the nominated series should be changed to: "The Prehistoric Sites of the Khorramabad Valley".

Comparative analysis

The comparative analysis has been divided into three parts, with the prehistoric caves and rock shelters, the Falak-ol-Aflak Ensemble, and the Khorramabad Valley compared separately to similar properties within the country, region and throughout the world, that are inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other relevant properties.

In the first part, the UNESCO "Human Evolution: adaptions, dispersals, and social developments" (HEADS) action plan has been used as the basis for comparison. The parameters for the comparison are: sites with relevant chronologies; sites with potential for further finds: sites with finds from poorly represented periods: groups of closely related sites or landscapes and cultural palaeolandscapes: sites of historical and even iconic importance in human evolution: and settlements associated with systems of hunting, fishing, or gathering. The nominated prehistoric caves and rock shelters are compared with thirty-four sites, including thirteen World Heritage properties, as well as other sites in the Caucasus, the Levant, Armenia, the Red Sea, the Jordan Valley, the Western Mediterranean, Western Europe, and the Persian Gulf.

The State Party concludes that there is no other site that possesses the same quality and variety of attributes as those included in the nominated series. The nominated series is crucial to our understanding of Neanderthals and anatomically modern humans and their ways of life in this region, as well as the significant role it played in the settlement and cultural development of anatomically modern humans (Homo sapiens) as they migrated eastward through Southwest Asia. It suggests that the Khorramabad Valley was a key area in human settlement and cultural evolution during Prehistory.

In the second part, the Falak-ol-Aflak Ensemble is compared with four World Heritage properties located in Denmark, Iraq, the Russian Federation, and Turkmenistan, as well as two World Heritage properties and one Tentative List site located in Iran. The parameters used for comparison are the strategic location; interaction with nature; historical layers; state of conservation, integrity, and stability; architectural and technique values;

authenticity of design, function, and materials; and symbolic and mythical significance of the monument for society.

In the third part, the Khorramabad Valley, where the nominated series is located, is compared with three similar World Heritage properties located in Iran, Argentina and Viet Nam, and one other site in Iran, on the basis of historical, natural, economic, technical and artistic values, beliefs, integrity, and authenticity, as well as interaction with the environment and continuity of settlement since prehistoric to contemporary times.

ICOMOS considers that the State Party's approach to the comparative analysis jeopardises its validity because, in the first two sections, only a part of the nominated series has been used for comparison, while in the third part, the whole valley, which is not what is nominated, has been compared with other sites.

However, ICOMOS considers that the first part of the comparative analysis has revealed that the prehistoric caves and rock shelters (elements 1 to 6) could have the potential to justify Outstanding Universal Value, if completed to include similar sites located in both the Zagros Mountains region and the Arabian Peninsula. This issue was raised in the interim report. In response, the State Party submitted in the additional information of February 2025 a detailed comparative analysis of the nominated prehistoric caves and rock shelters (component parts 1 to 6) with similar sites in the Zagros Mountains region, the Levant, and the Arabian Peninsula, which has effectively established their exceptional position in the geo-cultural and chronological contexts of Iran. Southwest Asia and the world.

ICOMOS considers that the revised comparative analysis justifies consideration of the prehistoric caves and rock shelters (component parts 1 to 6) for the World Heritage List as a reduced series.

ICOMOS does not consider that the initial comparative analysis justifies consideration of the nominated property, as configured in the nomination dossier, for the World Heritage List. However, ICOMOS considers that, based on the proposed revised narrative revolving around the Palaeolithic phase of human occupation, and the augmented comparative analysis, a reduced series comprising only component parts 1 to 6 justifies consideration for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii) and (v).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the prehistoric caves and rock shelters of the Khorramabad Valley bear witness to the most

comprehensive evidence regarding chronology, lithic artefacts, faunal remains, and decorative objects, offering a complete portrayal of the Baradostian culture, an outstanding Upper Palaeolithic culture of the Zagros, which has since vanished. The decorative items appear to have served as distinguishing marks for individuals as well as entire communities, shedding light on the emergence and development of symbolic communication in the region.

ICOMOS notes that the argumentation put forward by the State Party to justify criterion (iii) is focused on the prehistoric component parts and covers only the attributes included in component parts 1 to 6 of the nominated property. Therefore, criterion (iii) cannot be demonstrated for the nominated series as a whole.

Hence, ICOMOS considers that a revised series comprising only the prehistoric sites included in component parts 1 to 6 demonstrates Outstanding Universal Value on the basis of criterion (iii), as they are an exceptional testimony to the Upper Palaeolithic Baradostian culture on a global scale, and bear witness to the domination of the Neanderthals, to the arrival and expansion of the anatomically modern humans who eventually supplanted the Neanderthals in the valley, and provide insight into the migratory route of human dispersal out of Africa.

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that the nominated series is of Outstanding Universal Value due to its representation of traditional human settlements and land uses that reflect cultures or human interaction with the environment, the adaptive strategies employed by the populations in response to the environment, and transition of the settlements from caves to the valley. The nominated series represents a complete sequence of cultures that adapted and interacted with their environment and survived the effects of irreversible change throughout history until today.

ICOMOS considers that for criterion (v) to be demonstrated, the nominated property should bear witness to an exceptional outcome of the interaction between humans and their environment. However, the justification put forward by the State Party for this criterion is centred on the continuity of this interaction between humans and the environment. ICOMOS considers that this is a common phenomenon at the global scale, and that, as presented in the nomination, this continuity does not testify to an exceptional outcome.

ICOMOS considers that this criterion is not demonstrated.

ICOMOS considers that the nominated series, as presented in the nomination dossier, does not meet criteria (iii) and (v) but that a reduced series comprising only component parts 1 to 6 can justify criterion (iii).

Integrity and authenticity

Integrity

The integrity of the nominated series is based on the extent to which it contains all the attributes necessary to convey the proposed Outstanding Universal Value, and whether the component parts contribute individually and collectively to the proposed Outstanding Universal Value in a substantial, scientific, readily defined and discernible way. Integrity is furthermore a measure of the intactness of the attributes.

The State Party considers that the bond between the nominated series, as presented in the original nomination dossier, and its natural environment has been integrally preserved. The visual quality between the prehistoric caves, the rock shelters and their natural landscape, as well as the dominant views of the Falak-ol-Aflak Ensemble over the valley, have been maintained. The structural integrity of the caves, rock shelters, castle complex, and bridge have been kept intact. The damage to the bridge occurred historically, which does not impair the integrity. All the factors that negatively affected the nominated series are under control.

ICOMOS considers that with the shift of the narrative proposed in the additional information of February 2025, the arguments for integrity as developed in the original nomination are no longer valid.

However, the additional information of February 2025 also provided convincing arguments for a reduced series, formed by the nominated prehistoric caves and rock shelters included in component parts 1 to 6, to have potential to justify Outstanding Universal Value on the basis of criterion (iii). Each of these component parts contributes to the potential Outstanding Universal Value in a substantial, scientific, readily defined and discernible way. Therefore, ICOMOS considers that only a series reduced to the abovementioned component parts can fulfil the conditions of integrity. Each of the above component parts has been well preserved with affecting factors under control, and the respective buffer zones add an additional layer of protection.

Authenticity

Authenticity depends on the degree of credibility and truthfulness of information sources of the value of the nominated property. These sources of information must be considered and judged primarily within the cultural contexts to which they belong.

According to the State Party, and based on the initial nomination dossier, the prehistoric caves and rock shelters are authentic in their location, natural forms, and settings. Natural vegetation, seasonal and permanent rivers, water springs and historical paths have remained have been

maintained. Furthermore, besides the excavated areas, a large portion of the caves, rock shelters, and surrounding areas have remained undisturbed, preserving significant academic potential for future study.

ICOMOS notes that the initially nominated series does not credibly reflect the proposed justification for inscription, due to the fragmentation of the narrative, nor could it justify the revised narrative proposed in the additional information of February 2025 revolving around the Palaeolithic phase of human occupation.

However, ICOMOS considers that this revised narrative provides valid arguments to demonstrate the conditions of authenticity for component parts 1 to 6, which include the prehistoric sites. Hence, the conditions of authenticity for a reduced serial nomination, including only the abovementioned component parts, can be met.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of a reduced nominated serial property, limited to component parts 1 to 6, can be met.

Boundaries

There are thirty-three individuals residing in the area of the nominated property as experts, guards, and staff, while the number of permanent inhabitants in the buffer zones is 19.350.

The original nominated component parts include both natural hillsides and urban areas, while their buffer zones cover large natural settings and built environments. The need for protecting both the cultural heritage sites and natural settings further complicate the boundary demarcation. In order to better understand the rationale for delineating the boundaries, ICOMOS requested a clarification on this matter.

In the additional information of November 2024, the State Party clarified that areas of the nominated property have been outlined in such a way that they not only cover the main physical bodies of the caves and rock shelters but also major areas related to prehistoric settlement, such as stone sources for flake cores and the environment that is linked to prehistoric occupation. The boundaries of the castle complex are delineated following the natural boundaries of the river and hillside.

According to the State Party, the aim of delineating the buffer zones of the prehistoric caves and rock shelters is to protect the value of the nominated property. These include conserving important elements related to prehistoric occupation, such as water sources and flora and fauna diversity, and protecting the cave structures from mining, road and urban development, and pollution. The delineation has been made on the basis of the natural topography.

ICOMOS does not consider that the boundaries of the nominated series as presented in the nomination dossier are adequate, as the nominated series includes component parts and attributes that do not contribute to the proposed

refocused justification for inscription, revolving around the Palaeolithic period of human occupation only.

ICOMOS, however, considers the boundaries appropriate both for the component parts and the buffer zones if the nominated series is confined to component parts 1 to 6.

Evaluation of the proposed justification for inscription

In summary, based on the revised narrative and comparative analysis submitted by the State Party in the additional information of February 2025, ICOMOS considers that a reduced series comprising only component parts 1 to 6 justifies consideration for the World Heritage List on the basis criterion (iii). Criterion (v) is not demonstrated, either by the nominated series as presented in the nomination dossier or by the reduced series. The conditions of integrity and authenticity of the reduced series comprising component parts 1 to 6 are met, and their boundaries and buffer zones are appropriate. Based on the refocus of the narrative and the proposed exclusion of some component parts, ICOMOS advises that the name of the nominated series be changed to: "The Prehistoric Sites of the Khorramabad Valley".

4 Conservation measures and monitoring

Documentation

The quality of the field documentation undertaken in the past is adequate, providing detailed information that can be used as a baseline for future monitoring. A documentation centre has been established, which is supervised by the Cultural Heritage, Tourism and Handicrafts Organization of Lorestan, the provincial affiliate of the Iranian Ministry of Cultural Heritage, Tourism and Handicrafts (IMCHTH). More documentation has been planned.

ICOMOS is aware that the nominated prehistoric caves and rock shelters have not yet been fully excavated, that a scientific appraisal of their academic potential is absent, and that future research has been envisaged by the State Party. ICOMOS requested more information on this issue in its interim report. Additional information received in February 2025 indicates that investigations have been conducted since 2023 to assess the archaeological potential of these deposits, including a scientific appraisal of the Falak-ol-Aflak mound and of the stratigraphy of the Ghamari Cave (component part 2).

ICOMOS encourages the State Party, in collaboration with international institutions as appropriate, to continue scientific research on the prehistoric sites of the Khorramabad Valley. ICOMOS recommends the State Party to establish an annual calendar for archaeological excavation, survey, and study of artefacts using standardized methodologies, with non-invasive technologies for standardized documentation and up-to-date data analysis tools, to enhance data collection, management, timely updating, and correlation with GIS platforms, and to publish the results in a timely manner.

Conservation measures

Since the state of conservation of the nominated property is overall good, the conservation measures in place are mainly daily maintenance, such as routine cleaning and litter removal; monitoring of the condition of the component parts and construction activities in the buffer zones; risk management through awareness-raising activities for the local communities; and forward planning from the relevant governmental departments.

After the submission of the nomination dossier, fences and iron gates were installed at the entrances of the caves or the roads leading to the caves and the rock shelters, to control the access, and rangers are patrolling continuously. The excavated parts within the caves have been backfilled and protected with wooden walkways. All visitors are guided around the nominated prehistoric sites to ensure that they behave appropriately.

ICOMOS considers that the conservation measures in place are adequate.

Monitoring

There are forty monitoring indicators identified and classified into eight categories: caves and rock shelters; bridges; conservation and restoration of the Falak-ol-Aflak Ensemble: research and education: tourism facilities: natural and environmental elements in the nominated property and buffer zones: the Research Base archive: and development and traffic in the buffer zones. The monitoring activities are a combination of field visits, instrumental monitoring and periodic photography and surveying. The Research Base of the nominated property carries out the monitoring activities. It is also responsible for informing the relevant authority with the quality and quantity of monitoring programmes so that they can all be part of the overall comprehensive monitoring system. The experts of the Research Base maintain a continuous connection with relevant research and educational institutions, whether public or private, so that their knowledge and expertise can be used for enhancing monitoring of the site.

ICOMOS considers that, while the monitoring system is overall adequate, it should be adjusted to the recommended reduced series. Considering that the prehistoric sites are located at the fringe of a vibrant city where the ecosystem in the buffer zones is extremely fragile, more monitoring indicators should be developed to measure the effective protection of the buffer zones.

ICOMOS considers that, on the basis of a reduced series comprising only component parts 1 to 6, the level and quality of documentation is adequate, and can be used as baseline information for monitoring. Scientific appraisals indicate a strong academic potential for the nominated prehistoric sites, and further research projects are either being undertaken or envisaged, which are encouraged. The conservation measures are adequate; however, monitoring of the ecosystem in the buffer zones should be enhanced. Furthermore, ICOMOS considers that it would be advisable to adapt the monitoring system for easy

integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The government owns the nominated property, while in the buffer zones there are both public and private ownership statuses.

All the component parts of the nominated series have been registered on the National Monuments List and are therefore protected at the highest level.

The top legal instrument for the protection of cultural heritage in the country is the Law for Protection of National Heritage (1930). This is supported by the Bylaw Concerning Prevention of Unauthorized Excavation (1980), the Law Concerning Acquisition of Land, Building and Premises for Protection of Historic Properties (1969), the Law for Establishing Iranian Cultural Heritage Organization (1979), and the Law for Establishing the Higher Council for Architecture and Urban Planning (1987). This set of legal instruments is underpinned by a number of general laws and regulations, such as the Iranian Civil Law (1939), the Islamic Punishment Law approved in 1991 and 1995, and the Act of Conservation and Optimization of Environment.

Based on this legal framework, a set of regulations has been tailored to each nominated component part and the buffer zones, prescribing the prohibited and permittable activities in these areas. Any unsettled issues are subject to the permission of the Iranian Ministry of Cultural Heritage, Tourism and Handicrafts (IMCHTH).

The IMCHTH is the top governmental institution legally mandated for the implementation of cultural heritage protection laws. It has administrative and financial responsibilities for the management, protection, supervision, research, rehabilitation, and presentation of cultural heritage in Iran. The Cultural Heritage, Tourism and Handicrafts Organization of Lorestan is the provincial branch of the IMCHTH, undertaking all the tasks of the Ministry in the province. Every important historical site in Iran has a Research Base established by the IMCHTH for its management, including the nominated property.

Management system

The Research Base is the management body for the nominated series. It is supervised by the Deputy of Cultural Heritage, a subsector of IMCHTH. At the site level, the Research Base is supervised by two committees: one Steering Committee consisting of representatives from key institutional stakeholders at the national, provincial, and municipality levels, and one Technical Committee comprising experts from various fields. Within the Research Base, there are technical, research, presentation, and training teams, as well as teams for financial and legal affairs, and security sectors for daily management and monitoring. The Research Base also functions as a

coordinator among various stakeholders for the implementation of the management plan.

The management plan, approved by the Technical Council of the Lorestan Provincial Department of Cultural Heritage, Tourism and Handicrafts in 2023, is a guiding document for managing the nominated property. It comprises three parts: general introduction; protection and management of the nominated property; and monitoring. An action plan is included in the second part, with actions listed in the short-term (two years), medium-term (five years), and long-term (ten years) plans. As indicated in the additional information provided by the State Party in November 2024, ninety percent of the actions listed in the short-term plan have been accomplished.

The IMCHTH organises specialised meetings and training workshops. The Research Institute of Cultural Heritage and Tourism is responsible for multidisciplinary research and training of emerging specialists of the IMCHTH. Funding is provided mainly from the national budget, which is dedicated to maintenance, conservation, restoration, and research.

The integration of heritage impact assessment mechanisms into the decision-making process has not been explicitly stated. In the additional information of November 2024, the State Party indicated that, based on the Cultural Heritage Charter Law, it is the duty of the Cultural Heritage. Tourism and Handicrafts Organization of Lorestan to express an opinion regarding the feasibility of development plans in order to prevent damage to historical monuments. According to the Fourth Development Plan Law, all executive agencies must conduct historical and cultural studies before starting construction operations. ICOMOS acknowledges that this mechanism provides an opportunity to assess the impact of construction projects on cultural heritage. Nevertheless, in a World Heritage context, the principles and methodology for Heritage Impact Assessment are designed to specifically assess the impacts on the attributes of Outstanding Universal Value. Therefore, ICOMOS considers that the Guidance and Toolkit for Impact Assessments in a World Heritage Context, developed jointly by the World Heritage Centre and Advisory Bodies, should be adopted by the State Party in its decision-making process.

Visitor management

Over the past decades, the number of visitors to the nominated serial property has increased at a slow but steady pace. Promoting tourism is one of the main priorities in the current management framework.

The "Document 15-Years Development of the Tourism Industry in the I. R Iran" is the guiding document for the tourism extension plans of all provinces. Under this guideline, the plans, designs, and tourism development projects are prepared and organised according to regions and provinces while emphasising their national and regional values. The Comprehensive Plan of Lorestan Province Tourism Development Research, the Plan for Land Logistics and the Base Theory for the Development

of Lorestan Province, the National Framework Plan, and the Lorestan Region Framework Plan have set cultural heritage tourism development as a priority objective.

Currently, the tourism impacts are under control at the prehistoric caves and rock shelters (component parts 1 to 6). Tourist facilities and interpretation measures are adequate.

Considering the vulnerability of the prehistoric caves and rock shelters, as well as the fragility of the ecosystem of their buffer zones, ICOMOS requested, in its interim report, information on the carrying capacity of these component parts. The State Party responded in February 2025 by presenting a detailed carrying capacity study. On this basis policies for managing the number of visitors at the archaeological sites have been developed and implemented.

Community involvement

The local communities are involved in volunteering activities for the conservation and restoration of the nominated property. The government has also organised a variety of awareness-raising activities to promote the value of the nominated series. These two-way activities streamlined the willingness and efforts of the stakeholders, including the local communities, toward a common objective of the World Heritage nomination. Nonetheless, ICOMOS considers that community involvement should be strengthened in the decision-making process.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the effectiveness of the protection and management of the prehistoric sites is demonstrated, and the management system is robust. The tourism management at these sites is adequate. Community involvement should be strengthened in the decision-making process. Heritage Impact Assessment mechanisms should be incorporated into the decision-making process as well.

6 Conclusion

Located in the Khorramabad Valley in western Iran, the nominated series as initially proposed by the State Party comprised eight component parts, including five prehistoric caves, one prehistoric rock shelter, one architectural ensemble, and one historical bridge. It was developed based on three narratives but gradually shifted to a single one following the communication between the State Party and ICOMOS during the evaluation procedure. Subsequently, the narrative of the nomination has been revised to focus only on the prehistoric sites of the Khorramabad Valley (component parts 1 to 6 of the original nomination). While the Falak-ol-Aflak mound (the foundation hill of component part 7 of the original nomination) also includes a prehistoric site, its archaeological relevance and scientific significance have yet to be firmly established. For this reason, ICOMOS

considers that the mound should not be included as part of the proposed reduced series. Nonetheless, if in the future further archaeological investigations and scientific research can corroborate the initial findings and establish the capacity of this site to substantially and scientifically complement the attributes of the proposed reduced series in conveying the proposed Outstanding Universal Value, the mound might be included in the nominated property via a minor boundary modification request.

The proposed reduced series, comprising component parts 1 to 6, testifies to the final phase of Neanderthal presence in Eurasia, the coexistence of the Neanderthals and anatomically modern humans, the eastward dispersal of Homo sapiens through Southwest Asia, the development of human cognition in this part of the world, and the evolution of the lithic tool industry by the Baradostian culture. The proposed Outstanding Universal Value for this reduced series has been demonstrated on the basis of criterion (iii), and its conditions of integrity and authenticity are met.

The state of conservation is good overall, and the factors affecting the nominated property are under control. The level of documentation, conservation measures, and legal protection is adequate.

Adjustments should be made to the proposed reduced series in terms of management system, monitoring, and interpretation. Recommendations have been made on conservation, future research, Heritage Impact Assessment mechanisms, and community involvement.

ICOMOS finally considers that the name of the nominated property should be changed to better illustrate the proposed reduced series and its revised narrative.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Prehistoric Caves and Falak-ol-Aflak Ensemble of Khorramabad Valley (PCFEKV), Islamic Republic of Iran, with the exception of component part 7 (Falak-ol-Aflak Ensemble) and component part 8 (Shekaste Bridge (Shapouri Bridge)), be inscribed on the World Heritage List on the basis of criterion (iii).

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Prehistoric Sites of the Khorramabad Valley comprise five prehistoric caves and one rock shelter with evidence of human occupation dating back to 63,000 BP. These are the Kaldar, Ghamari, Gilvaran, Yafteh and Kunji caves, as well as the Gar Arjeneh Rock Shelter (component parts 1 to 6). The Khorramabad Valley is located in the Central Zagros Mountain Range, one of the key routes of human dispersal out of Africa. The numerous caves and rock

shelters, ample water resources, rich fauna and flora, suitable stone sources for the tool industry, and relatively mild climate have created favourable conditions for human settlement since the Middle Palaeolithic period.

Archaeological excavations and study of the artefacts excavated on the sites have established the scientific chronology of human development in the valley. The Mousterian layers in Kunji Cave testify to the domination of the Neanderthals in the valley during the Middle Palaeolithic. During the transition between the Middle and Upper Palaeolithic periods, anatomically modern humans arrived in the valley, expanded their settlements and eventually supplanted the Neanderthals, illustrating the earliest transition phase in the Zagros region, which shed light on the debate over human migration routes out of Africa into Eurasia. The pendants and other decorative objects discovered at the sites, the evidence of using ochre pigments, as well as a decorated piece of terracotta mark the emergence of human cognitive behaviour and belief systems. The shell pendants were possibly sourced from the Persian Gulf, indicating the existence of communication and exchange routes between the Khorramabad Valley and the lowlands of the Persian Gulf during the Upper Palaeolithic period. Large numbers and varieties of stone tools discovered at the sites bear witness to the sophisticated stone tool technologies of the Baradostian culture that surpassed contemporaneous developments in the Zagros Mountains.

Criterion (iii): The Prehistoric Sites of the Khorramabad Valley, with the shell pendants sourced from the distant Persian Gulf and ornaments fashioned from deer canine teeth, are an outstanding manifestation of the emergence and evolution of symbolic communication, a crucial aspect of modern human cognitive development. This evidence. alongside sophisticated stone technologies, is an exceptional testimony to the Upper Palaeolithic Baradostian culture on a global scale. The caves and shelters bear witness to the domination of the Neanderthals, to the arrival and expansion of the anatomically modern humans who eventually supplanted the Neanderthals in the valley, and provide insight into the migratory route of human dispersal out of Africa.

Integrity

The prehistoric sites collectively illustrate the multifaceted life of the prehistoric communities and their evolution, and, individually, each of the six component parts contributes to the overall Outstanding Universal Value in a substantial, scientific, readily defined and discernible way. Each component part has been well preserved with affecting factors under control, and the buffer zones provide an additional layer of protection. Despite the development of human settlements in the Khorramabad Valley and the gradual urbanisation of the area, the component parts have maintained their spatial relationships with their relatively undisturbed surrounding environment.

Authenticity

The prehistoric sites are authentic in their location, natural forms, and settings. Natural vegetation, seasonal and permanent rivers, water springs and historical paths have been maintained in these spaces. The archaeological resources are largely undisturbed, constituting a vast authentic knowledge reservoir for future research.

Protection and management requirements

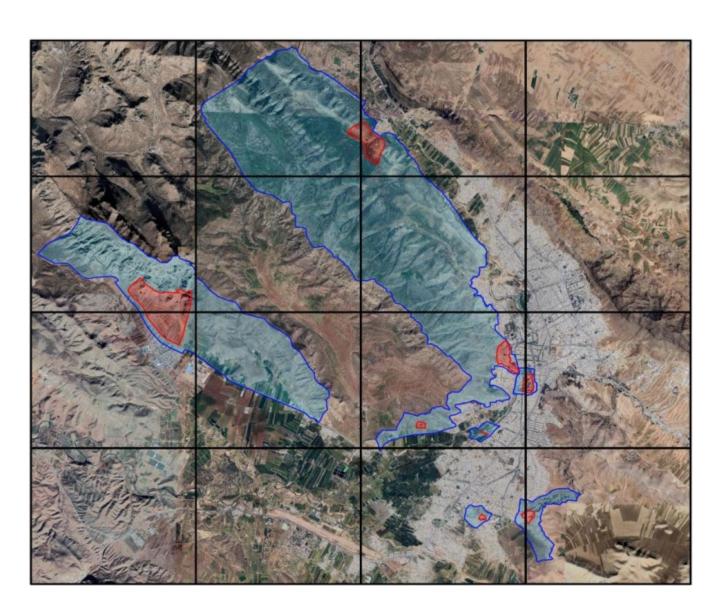
All the component parts have been included on the National Monuments List, conforming to the legislation in force, and are governed, together with their buffer zones, by specific regulations inherent to their protected heritage status. The Iranian Ministry of Cultural Heritage, Tourism and Handicrafts (IMCHTH) is responsible for their research, conservation, monitoring, and management. These activities are implemented through the Research Base, which is a decentralised multi-disciplinary centre reporting to the IMCHTH and the management entity of the property. The management plan sets out management objectives and an action plan with short-, medium- and long-term conservation measures to preserve the values and maintain the integrity and authenticity of the property. The legal and management systems in place ensure the long-term preservation of the property and its immediate and wider setting, which is important to sustain and understand the Outstanding Universal Value of the property.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Adjusting the current management system and the management plan, the monitoring system, and the interpretation strategy to focus on the reduced serial property,
- b) Considering constructing a shelter to protect the sondage pit in front of the Gilvaran Cave (component part 3),
- c) Establishing a research programme, in collaboration with international institutions as appropriate, and continuing regular scientific research on the prehistoric sites of the Khorramabad Valley to enhance data collection and management,
- d) Integrating Heritage Impact Assessment mechanisms, as prescribed in the Guidance and Toolkit for Impact Assessments in a World Heritage Context, in the decision-making process,
- e) Strengthening the involvement of local communities in the decision-making process of the property management.

ICOMOS recommends that the name of the serial property be changed to: "The Prehistoric Sites of the Khorramabad Valley".



Map showing the boundaries of the nominated component parts

Forest Research Institute Malaysia Forest Park Selangor (Malaysia) No 1734

1 Basic information

Official name as proposed by the State Party

Forest Research Institute Malaysia Forest Park Selangor (FRIM FPS)

Location

District of Gombak State of Selangor

Brief description

Located about sixteen kilometres northwest of Kuala Lumpur, the Forest Research Institute Malaysia Forest Park Selangor (hereinafter FRIM FPS) is a mature human-made tropical rainforest which was planted from the 1920s onwards on heavily tin-mining degraded land. The nominated property includes residential, scientific and service buildings and facilities, water bodies and a network of avenues and trails. It was planned in 1925-1926 adjacent to the already established Bukit Lagong Forest according to the design of a British Malay rubber estate. The FRIM FPS is the outcome of an early reforestation experiment implemented over decades by a team of western-trained scientists and local labourers that managed to create the equivalent of a naturally mature lowland tropical forest on highly degraded soil.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

23 February 2017 as "FRIM Selangor Forest Park"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, as well as their conservation and management,

were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 7 to 15 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the documentation and the delineation of boundaries.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the broader historical context, documentation on the built heritage and layout, the experiment and its potential outcomes, additional information concerning the justification for criterion (ii), the buffer zone, tourism, and the local community.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Forest Research Institute Malaysia Forest Park Selangor (hereinafter FRIM FPS) is a mature human-made tropical rainforest which was planted from the 1920s onwards on heavily tin-mining degraded land, adjacent to the already existing Bukit Lagong Forest.

The Forest Research Institute was established in 1925 and 1926, under the scientific coordination of the first Forest Research Officer, Dr. F.W. Foxworthy, and his deputy, J.G. Watson. It was within this framework that an extensive and large-scale reforestation experiment was initiated on a former mined area. Dr. Foxworthy chose the site due to its abundant water resources and proximity to another forest reserve (Bukit Lagong Forest Reserve).

The rubber estate planning layout was selected for the creation of the new forest reserve, as it was a widespread type of plantation in the region. This decision may have also been determined by the similarity between the

organisational structure of the newly created Forest Research Institute and that of a rubber plantation, despite their entirely different missions. This layout offered a pragmatic solution for planning the different functions within the reserve, with a clear division of functions and related spaces. This structure was also reflected in the hierarchy of the reserve that mirrored the spatial organisation of the Forest Research Institute.

Based on the additional information provided by the State Party in November 2024, no historical documentation seems to survive that could attest to the chosen original layout or to the models that inspired the layout of the FRIM FPS. The additional information of 2025 reports that an ex-rubber planter – R.H. Whitty – acted as an officer in Dr. Foxworthy's team and may have influenced the spatial planning of the future FRIM FPS.

While Dr. Foxworthy and Watson were likely influenced by the context in which forest conservation developed between the late 19th and early 20th centuries, in the 1920s knowledge about tropical forests was still in its early stages. Therefore, the reforestation initiative was undertaken through a systematic process of trial and error approach, which combined scientific experiments and traditional knowledge held by the staff of the FRIM FPS.

The Research Nursery and two arboreta. for Dipterocarpaceae and non-Dipterocarpaceae species. were established in 1926 and 1928. Seedlings from the nursery were taken and manually planted directly in the mined land. All available tree species were planted to test their ability to adapt to the depleted soil before large-scale reforestation efforts began. Between 1926-1927, 161 species were planted to test their resistance in the harsh environment. Seedlings that died were replaced by other species as needed. Monthly weeding was conducted to clear away invasive vegetation, with no machinery, irrigation, or pesticides involved. The effort was accomplished in a short time by a team of approximately 10 scientists and 200 staff and labourers recruited locally. By 1932, when Dr. Foxworthy retired, every plot of land had been planted with a mixture of many species, with the first species planted already reaching six metres in height, with straight, strong trunks.

Although there was no formal plan governing the establishment of the forest, fifty-five fields were progressively delineated based on the topographical contours of the site and the layout of the forest trails. These fields have remained intact, with a record of 855 tree species. Altogether, the nominated property contains approximately 2,300 species of vascular plants, including ferns, shrubs, herbs and epiphytes. Lower plants have not been systematically documented, but some 200 species of macrofungi have been recorded. The FRIM FPS supports a diverse indigenous fauna, including 13 Critically Endangered, 25 Endangered, and 35 Vulnerable species. Altogether, the nominated property offers refuge to 233 bird species, 62 mammal species, 82 reptile species, 34 amphibian species, and 21 freshwater fish species. It also hosts a variety of insect species including

324 butterfly species, 11 firefly species, 18 dung beetle species, 92 ant species and 10 termite species.

This human-cultivated rainforest matured into an ecosystem harbouring rich biodiversity, and a multi-tier forest structure that presents a crown shyness pattern comparable with that of a naturally-growing lowland tropical forest. Based on the Field Planting Records, the trees are between 30 and 100 years old. They are still growing and will continue to do so in the future.

Additional support facilities were added over time, such as the Coniferetum (1949), the Fruit Tree Arboretum (1979), and the Kepong Botanic Garden (1995) which was established around the Lagong Lake to accommodate the increasing number of visitors. It focuses on ex-situ plant conservation, and aims to expand the diversity of species conserved. Additionally, the Experimental Plots cover an area of seventy-five hectares to the western end of the nominated property.

The layout of the nominated property includes a network of roads, tree-lined avenues and trails, the Administration Building, housing quarters and water bodies. The two main avenues, named after Dr. Foxworthy and the Jelutong tree, were lined with trees in 1928 that are now imposing. Tall Royal Palm trees decorate the grounds in front of the Administration Building.

Completed in 1929, the Administration Building was designed in Art Deco style with Malay vernacular architectural elements. While the building has maintained its main external characteristics, its function, interior use and spatial arrangements have evolved though time. From the 1960s onwards, additional offices have been erected around this building.

The nominated property also encompasses streams, lakes, ponds and natural wetlands which were an essential factor for selecting the site for the reforestation experiment. While most of the wetlands were filled in, two remain, a result of former mining activity. One has been transformed into the Office Pond, and the other is located near the Fruit Tree Arboretum.

As the Research Institute was quite isolated from any residential area when it was established, managers opted to have the scientists and staff live on the site.

In 1927, a two-storey Art Deco bungalow, named Villa Aromatica, was built for the head of the Institute, while smaller bungalows were constructed for the other scientists. Staff members were accommodated in semi-detached houses built in the early 1930s, while lower-grade labourers were accommodated in temporary wooden houses built in local *kampung* style. Over time, these structures have since been altered. The Villa Aromatica and the semi-detached houses are no longer used as dwellings but as offices or representational spaces. Only some of the timber houses are still used as residences

Other social facilities were provided beyond the housing quarters, such as schools, clinics, places of worship, and recreational facilities.

The work hierarchy mirrored the social hierarchy. However, the continuous contact between scientists and staff, as well as among staff members, facilitated the development of social bonds which contributed to the success of the scientific experiment. This also nurtured a sense of purpose in the efforts to maintain the human-made forest and favoured the integration of traditional knowledge into the implementation of the reforestation efforts.

The work organisation and social structure were maintained after Malaysian Independence in 1957, and foreign scientists were replaced by Malaysian scientists who continued to live onsite. Nowadays, scientists and senior staff no longer live on the reserve, but they continue to play a social role in strengthening the social bonds of the FRIM FPS professional community.

After the Second World War, a new global paradigm emerged in the field of forestry, favouring monocultures of selected tree species rather than indigenous forests. This dynamic led to the planting of imported exotic pine species in the Experimental Plots, in the 1960s-1970s, at Bukit Hari, to cope with a possible shortage of paper. Eventually, the economic interest of pine trees declined and the Experimental Plots were replanted with indigenous species.

The additional information sent by the State Party in response to the ICOMOS interim report provided limited new clarifications and additional drawings. Due to the reported unavailability of archival documentation related to the nominated property, the State Party largely reiterated information already provided in November 2024. It was nonetheless clarified that seeds were collected from all over the country and required immediate germination. Some 25,000 seedlings, distributed across 330 nursery beds were grown at the nursery (1926) and raised in bamboo tubes. Works were carried out using local tools and materials by local staff who held traditional knowledge about local plants, whose expertise was instrumental in the rapidity of the planting and the success of the endeavour.

The nominated property has an area of 589 ha, and a buffer zone of 767 ha.

ICOMOS observes that statements concerning the state of knowledge of tropical rainforests at the beginning of the 20th century, described as not yet being sufficient to provide a sound scientific basis for reforestation, do not appear to be entirely accurate. By the 1920s, forestry and forestry knowledge had already been extended beyond the temperate climate of colonial powers. In French Colonial Western Africa, an office of Agriculture and Forests was established based on the *loi forestière de l'Afrique occidentale française* (1900), with a view to the scientific management of rainforests. Reforestation was

already considered in Algeria in the 1880s, given the impact of forests on climate, soil conservation, humidity, public health, etc. At that time, the experiments conducted by the French colonial administration led to the development of specialised knowledge about tropical species and forests. For instance, scientific conferences on the anthropogenic threats on tropical forests were held in 1900 during the Universal Exhibition in Paris, and the first publications in French on rainforest deforestation and anthropogenic threats appeared in the 1920s. The French National School of Forestry (École nationale des eaux et forêts) was established in 1824, and a forest research centre with a focus on tropical wood species was established in the 1880s.

In Southeast Asia, forest governance departments and institutions, e.g. in Singapore, the Dutch East Indies, the Philippines and Burma, already existed. The Department of Forests in British Malaya appears to have been founded at the beginning of the 20th century by transferring the forest authority from the Singapore Botanic Gardens to Kuala Lumpur. Forestry institutions in the region had already been conducting research on the biodiversity of tropical forests and reforestation for several decades. This knowledge was applied to silviculture and forest cultivation for profit. Therefore, the scientific understanding of tropical rainforests was already advancing when Dr.Foxworthy initiated the reforestation experiment.

State of conservation

The nomination dossier provides an account of the state of conservation of the proposed key attributes of the nominated property: the human-made tropical rainforest, the historic estate layout, and the community living on site. The close links between the staff helped to preserve the forest during the Second World War and the Japanese Occupation, as the staff remained on duty and cared for the forest when the foreign scientists were compelled to leave.

According to the nomination dossier, the forest has reached a stage of maturity that enables self-rejuvenation through the production of seedlings and saplings. The occasional loss of individual trees creates forest gaps for new trees to grow, thus contributing to maintaining the forest, with human intervention applied when necessary.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is satisfactory. Close monitoring and reduction of negative impacts by visitors are deemed necessary, as is an active programme of conservation measures for all built and support facilities.

After the statutory deadline of 28 February 2025, beyond which date ICOMOS can no longer take into account or include any new information submitted by the State Party and therefore exchange with the State Party on a specific issue as part of the evaluation procedure, ICOMOS has learned that six quarries for building materials are operational in the Bukit Lagong Forest Reserve (BLFR).

Concessions for some twenty additional quarries have been proposed or authorised, with the possible transformation into quarried land of a large part of the BLFR. While it seems that the quarrying concessions do not encroach on the BLFR sectors planned to act as the buffer zone of the nominated property, ICOMOS notes with concern the potentially significant negative impacts on the ecological processes in the nominated property and its self-regeneration capacity. The nomination dossier and the Conservation Management Plan (CMP) explain well the functional connectivity between BLFR and the nominated property, which has favoured seed and pollen dispersal into FRIM FPS and thus has contributed to the success of the reforestation experiment and to the biodiversity of the nominated property.

The possible opening of new quarries may negatively impact the stability of the forest system and the conservation of the attributes supporting the potential Outstanding Universal Value of the nominated property.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are soil compaction triggered by an increasing number of visitors, including mountain-bike users, air pollution caused by the progressive expansion of the metropolitan area of Kuala Lumpur, and potential loss of historical elements caused by the demolition or replacement of traditional wooden houses. Additionally, some historical structures and spaces are popular for organising events and are rented out to private individuals or entities. Their intensive use leads to wear and tear and needs to be carefully monitored and regulated.

Considering the biodiversity of the area and the presence of several threatened species, IUCN considers it essential to regularly monitor the species diversity of the nominated property.

Based on the recent information concerning potential quarrying developments in the BLFR, ICOMOS observes that the possible opening of some twenty quarries in addition to the six already operating within the reserve represents a major affecting factor that can jeopardise the nominated property and needs to be promptly redressed by the State Party.

Based on the nomination dossier and the exchange of additional information, ICOMOS considers that the state of conservation of the nominated property is overall satisfactory. The main factors affecting the nominated property are soil compaction, air pollution, urban development in the immediate and wider setting of the nominated property, and possible excessive pressure on historical built elements. The existence of concessions for twenty more quarries in addition to the six already operating in the reserve represents a major affecting factor for the nominated property, given the crucial role played by the BLFR in the success of the FRIM FPS

reforestation experiment. The State Party is recommended to withhold the quarrying concessions and progressively remove quarrying activity from the BLFR, given its functional connection with the ecological processes of the nominated property.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated property is a human-made tropical lowland rainforest born from an innovative scientific experiment aimed at recreating a forest on land severely depleted by tin mining. It represents a cultural landscape that blends British colonial and local Malay design and architectural elements reminiscent of a typical rubber estate, once widespread in Malaysia.
- It is an exceptional testimony to the combined work of humans and nature, where scientific method and local knowledge combined to create a mature tropical forest landscape on previously devastated mined land, coinciding with the establishment of a forest research institute.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the human-created tropical rainforest with its fifty-five fields and its embedded biodiversity, as well as its support facilities; the historic estate layout, inspired by Malay rubber estates and characterised by British colonial and local Malay features, comprising roads and avenues, housing quarters, water bodies and the Administration Building; the FRIM FPS community living on site, which has developed since the establishment of the Research Institute and contributed to the success of the scientific experiment.

ICOMOS notes that only part of the FRIM FPS staff lives on site today, which means that the community has changed. Therefore, it is difficult to consider the contemporary community as an attribute of the proposed Outstanding Universal Value. However, the staff community still represents a key element in the effective management of the nominated property. Furthermore, it seems that efforts are being made to maintain the spirit of the initial development phases of the FRIM FPS.

Comparative analysis

The comparative analysis has been conducted considering different manifestations of tree plantations, including plantations, botanic gardens, and experimental planting carried out by forest research institutes. These types have been ruled out as irrelevant comparators for the nominated property. The core of the comparative analysis has examined other human-made forests planted on devastated land. As no similar properties have

been identified within the territory of the State Party, the analysis has examined properties at the regional and global levels. As forests inscribed on the World Heritage List or included in the Tentative Lists of States Parties are all natural forests, the comparison has focused on other properties.

According to the State Party, the man-made forest of Bilar and Loboc (Philippines) is the closest comparator to the FRIM FPS at the regional level. At a global scale, the closest comparator would be the Tijuca Forest, which is part of the World Heritage property "Rio de Janeiro: Carioca Landscapes between the Mountains and the Sea" (Brazil, 2012, criteria (v), (vi)). Among non-tropical human-made forests, Western Australia Jarrah Forest (Australia) and Saihanba National Forest Park (China) have been identified as relevant comparators. The nominated property would stand out in comparison to the man-made forest of Bilar and Loboc and the Tijuca Forest because these forests were established on agricultural land that was not as depleted as the mined land of the FRIM FPS site. The other two sites, in Australia and China, were not considered comparable as they are not tropical forests.

ICOMOS considers that the proposed comparative analysis is not adequately articulated and is based on a focus that is too narrow. Numerous efforts for reforestation in the tropics were ongoing before the 1920s, with examples in the Philippines, the Dutch East Indies, and even in the Malay colony. In Singapore, a massive reforestation programme was launched. Cases of landscape recovery from mining activities in the 1920s and 1930s are also found in Australia (Broken Hill), the United States of America and South Africa.

Although botanic gardens are different from human-made forests, a discussion on how they have contributed to developing knowledge and science in the field of tropical vegetation should have been presented to contextualise the scientific and cultural framework of the Malay reforestation project.

Despite these shortcomings, ICOMOS considers that the nominated property deserves consideration for the World Heritage List as an early example of reforestation attempts in tropical conditions.

ICOMOS considers that the comparative analysis, despite its weaknesses, justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii) and (v).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

The State Party considers that this criterion is justified on the grounds that the nominated property would reflect an interchange of human values at multiple levels. The design of the rubber estate reflects British and Malay influences in its overall layout, architectural language, and the multi-ethnic and multi-cultural environment of the community living on site. The scientists represent the Western influence, whereas the local staff and workers bear witness to the regional and local influence.

ICOMOS noted that insufficient information had been presented in the nomination dossier with regard to the layout of the nominated property in relation to British Malaya rubber estates. However, the State Party confirmed in the additional information provided in November 2024 and February 2025 that no supplementary documentation on the influence of Malaya rubber estates on the nominated property layout could be retrieved in Malaysia or abroad.

ICOMOS also notes that the interchange of human values that occurred in the community living on site cannot be considered to contribute to the justification of this criterion. Further documentation and explanations would be necessary to determine whether there has an interchange between Western scientific knowledge, held by scientists, and local or traditional knowledge, held by the local staff, and how it would be reflected in the design and development of the human-made forest.

ICOMOS finally considers that there is insufficient evidence to demonstrate that the nominated property exhibits an important interchange of human values in any of the spheres covered by criterion (ii) as it has not been proven that the nominated property is an exceptional outcome of imported ideas, or fusion of ideas that, in turn, is demonstrated to be influential in the developments of architecture, town-planning or landscape design.

 ${\tt ICOMOS}\ considers\ that\ this\ criterion\ is\ not\ demonstrated.$

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment, especially when it has become vulnerable under the impact of irreversible change;

The State Party considers that this criterion is justified on the grounds that the nominated property bears witness to the creation of a human-made mature lowland tropical rainforest on land devastated by mining. This forest is the result of a scientific endeavour lasting several decades at a time when knowledge of, and interest in, tropical forests was very low. It was a key milestone in the field of forest regeneration, advancing knowledge about tropical forests.

ICOMOS considers that this criterion is not adequately justified. The proposed justification gives an account of the damage done to the landscape and celebrates its remediation, rather than presenting an exemplary landscape that would bear witness to human occupation and the particular features and patterns, both human-generated and adapted to the landscape, that result.

ICOMOS considers that the nature of the nominated property and its values are not consistent with the spirit and rationale of criterion (v). Therefore, this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

The State Party did not propose this criterion in the nomination. However, ICOMOS observes that the nominated property might be seen as an outstanding example of a designed forested landscape, historically and tangibly testifying to the efforts of large-scale environmental rehabilitation at the beginning of the 20th century. As such, it may be seen as a remarkable illustration of a phase in human history when scientific methods were applied to remedy the devastating impacts of mining at a time when ecological concerns were beginning to emerge.

ICOMOS considers that this criterion has the potential to be demonstrated if further documentation and information on the global context in which the FRIM FPS took place, based on the preliminary elements of the historic-cultural context presented by ICOMOS in the "Description and history" section of this report, are provided.

ICOMOS considers that the proposed attributes might overall be adequate to contribute to the justification of criterion (iv). However, these attributes will need to be further articulated and detailed, and the tangible and intangible features of the nominated property will need to be accurately presented to ensure that the proposed Outstanding Universal Value is manifest and well substantiated.

With regard to the community living at FRIM FPS, ICOMOS notes that significant changes have occurred since the initial arrangements were made for all staff, from scientists to labourers, to live onsite and, as a result, ensure their close cooperation and the development of stronger professional and social bonds, essential to the success of the project. Therefore, ICOMOS does not consider that the current community is an attribute of the proposed Outstanding Universal Value. However, the communal spirit still cultivated at FRIM FPS is an important dimension of the nominated property which needs to be sustained, as it can contribute to its effective conservation and management.

ICOMOS considers that criteria (ii) and (v) have not been demonstrated. However, ICOMOS considers that criterion (iv), which was not initially proposed by the State Party, seems more appropriate in terms of its scope. The nominated property might be seen as an outstanding example of a designed forested landscape, historically and tangibly testifying to the efforts of large-scale environmental rehabilitation at the beginning of the 20th century, at a time when ecological concerns started to emerge. ICOMOS considers that criterion (iv) might have the potential to be demonstrated by the nominated property, provided that the State Party further develops and expands on the regional and global historic-cultural context of the development of forest science, reforestation efforts, and environmental concerns, and that it positions the development of the nominated property within such a

Integrity and authenticity

Integrity

It is stated in the nomination dossier that the nominated property includes all the attributes necessary to convey the proposed Outstanding Universal Value, and that it is of sufficient size to minimise potential detrimental effects of external factors.

The form, structure and biodiversity of the forest have been sustained since the 1980s, demonstrating stability of the nominated property in terms of its size, structure, biological composition and resistance to invasive species.

Therefore, the nominated property is of adequate size to convey the proposed Outstanding Universal Value, and its ecological stability indicates that its integrity and attributes have not been compromised.

As criteria (ii) and (v) initially proposed to justify the potential Outstanding Universal Value have not been demonstrated, but criterion (iv) might be, integrity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, cannot be confirmed at this stage.

Furthermore, ICOMOS observes that the Bukit Lagong Forest Reserve (BLFR), which was already established at the time of the reforestation experiment, has played – and continues to play – an important role in the ecological processes associated with the nominated property.

The existing factors affecting the nominated property, among which the potential opening of some twenty additional quarries in the BLFR with the consequent significant reduction of its forest cover and related ecological processes, might undermine specific attributes of the proposed Outstanding Universal Value. Hence, the potential integrity of the nominated property appears vulnerable and stringent measures to redress the factors threatening it need prompt implementation.

Authenticity

The nomination dossier states that the composition and multi-tiered structure of the FRIM FPS are consistent with those of a natural lowland tropical forest in the Indo-Malay Biogeographic Realm, exhibiting the features of an authentic tropical rainforest. The FRIM FPS reflects all the main features of a lowland tropical forest, such as the evergreen tendency, dominance of broad-leaved plants, structural stratification in five tiers, and crown shyness.

The Research Institute, established during the British occupation of Malaysia, has continued its activity and function to the present day, ensuring continuity in the approach to the conservation and management of the human-made forest. The rubber estate layout and its articulation in fifty-five fields has been retained, as well as the road network. The main buildings have retained their characteristics and legibility, while additional trails and buildings have been added for management purposes.

The community living on site has continued to this day, with the population residing in the nominated property remaining between 100 to 200 families. The scientific staff no longer resides on-site, but the spirit of the community has been retained.

As criteria (ii) and (v) initially proposed to justify the potential Outstanding Universal Value have not been demonstrated, but criterion (iv) might be, authenticity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, cannot be confirmed at this stage.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have not been met at this stage. The conditions of might be met when information to adequately substantiate criterion (iv) is provided. However, for the conditions of integrity to be met, the major factors affecting the nominated property, including the potential significant increase in quarrying in its immediate setting, albeit outside the proposed buffer zone, must be removed and the buffer zone expanded to cover the whole of the BLFR.

Boundaries

The nominated property covers the entirety of the FRIM FPS, which is a protected National Heritage Site. The boundaries of the nominated property delimit an elongated area stretching from southwest to northeast and encompass the south-eastern-facing slopes of Lagong Hill.

The buffer zone includes a small section of the BLFR to the north of the nominated property and a narrow strip of built-up land to the south.

Based on the nomination dossier, 192 families (approximately 800 people according to 2022 data) live in the nominated property, while 22,555 families (totalling 106,988 individuals according to 2018 data) live in the buffer zone. The residents of the nominated property are the families of the FRIM FPS staff. They live on the

nominated property for as long as the family member is employed by the forest reserve, after which they leave.

ICOMOS requested additional information from the State Party on the rationale for the buffer zone boundary delineation. In November 2024, the State Party explained that the northern part of the buffer zone follows the boundaries of the three forest compartments established in the BLFR. These compartments encompass three rivers -Chemubong, Kroh and Chahaya – which provide the water resources necessary for FRIM FPS to grow and be sustained. The presence of these rivers contributed to the choice of the site to carry out the reforestation experiment. The boundaries of the three compartments to the north correspond to the ridge contours of the river watershed. On the other hand, the southern part of the buffer zone covers a low-rise residential and commercial area which has not undergone significant changes over the last forty years and will be protected under legal instruments, including the Local Plan of Selayang Municipal Council 2030 and the Kuala Lumpur Structure Plan 2040. The additional information also mentions a "tertiary zone" extending beyond the proposed buffer zone to the south that ensures additional protection against visual impacts, as well as development control for the nominated property.

Given the pressures of urban development in the area, attested to by the significant changes in the broader setting of the nominated property over the last fifty years, as evidenced in the cartography provided by the State Party in the additional information of November 2024, and taking into account that the existence of the BLFR has favoured the rapid extension of biodiversity as well as the positive outcome of the reforestation experiment at FRIM FPS, ICOMOS considers that the boundaries of the buffer zone should be extended to include the entirety of the BLFR to the north and the tertiary zone to the south.

ICOMOS raised this issue in its interim report. In the additional information of February 2025, the State Party replied that the three compartments of the BLFR (C14, C16 and C18) provide a sufficient buffer to protect the proposed Outstanding Universal Value as they support slope stability and water quality, as well as a larger area for biodiversity. The BLFR has held gazetted status since 1917, and any process of degazettement is governed by Malaysian legislation, making it a lengthy and difficult process. Therefore, the State Party considers that it is not necessary to expand the buffer zone.

Regarding the tertiary zone to the south, the State Party responded that there is no need to add it to the buffer zone as it enjoys protection mechanisms under the National Heritage Act (Act 645) of 2005.

From the zoning maps included in the Local Plan of Selayang Municipal Council 2030 provided with the additional information of February 2025, ICOMOS notes with concern that a small portion on the eastern side of the nominated property seems to have been transferred to the buffer zone or at least to a different planning zone (Amendment FRIM FPS - BPK 4.1: Selayang Utama Land

Use Zone RTMPS 2030 (Replacement)). This requires clarification from the State Party on whether this portion is no longer part of the nominated property, has been or is planned to be degazetted.

ICOMOS also observes that a concerning number of quarrying concessions seem to have been proposed in the BLFR, with or without planned degazettement of the respective areas. Furthermore, the degazettement of some sections of the BLFR appears to have already occurred for housing projects in the past.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the nominated property deserves consideration for the World Heritage List, despite shortcomings in its contextualisation and the comparative analysis. The justification for the selected criteria (ii) and (v) is either not supported by sufficient tangible and documentary evidence or does not meet the wording and rationale underlying these criteria. However, based on the features of the nominated property, ICOMOS considers that it has the potential to justify criterion (iv) if further information on the regional and historic-cultural context in which experimentation at FRIM FPS took place is provided. The conditions of integrity and authenticity are not demonstrated at this stage. The additional information submitted in February 2025 suggests that a small portion of the nominated property to its eastern side seems to have been transferred to the buffer zone or to be subject to a different planning/protection regime. Clarification on this matter is needed from the State Party. Furthermore, considering the historical and functional connectivity between the nominated property and the BLFR, ICOMOS considers that it should be included in its entirety within the boundaries of the buffer zone to provide an additional layer of protection to the nominated property. Furthermore, integrity appears vulnerable due to major affecting factors in the immediate setting of the nominated property, in particular the potential expansion of quarrying and the subsequent erosion of the forest cover in the BLFR, the external urban pressures, and the possible increase in number of visitors to the nominated property. Therefore, the enlargement of the buffer zone both northwestwards and south-eastwards and the development of appropriate protection mechanisms are needed.

4 Conservation measures and monitoring

Documentation

The nomination dossier and the additional information contain several appendices that attest to the detailed documentation of the attributes of the human-made forest, its biodiversity, and its plot structure. However, the estate layout and the built heritage seem less systematically documented and lack the same level of detail.

ICOMOS considers that all the surviving original buildings and structures, along with their transformations over time,

need to be documented in detail. The same applies to the overall layout and the modifications that have occurred since the creation of FRIM FPS. This will serve as a basis for a better understanding of the conditions of integrity and authenticity of the key attributes of the proposed Outstanding Universal Value, and for guiding management and maintenance programmes. An assessment of all changes, replacements and additions to both the layout and the buildings is advisable in order to determine whether some of these modifications may have affected the legibility of the historical layout and buildings.

As the State Party has informed that some buildings are planned for demolition, ICOMOS requested in the interim report that photographic and graphic documentation of these buildings be provided before any final decision is made about their future.

The State Party only provided a few drawings of residential buildings, and clarified that some wooden buildings had been demolished due to their state of disrepair. No photographs or other documentation of these buildings, nor of those planned to be demolished, has been provided. However, built heritage cannot be demolished without approval from the Commissioner of Heritage.

ICOMOS also considers that the documentation of biodiversity should be completed with information that explains the ratio between native and non-native species, the number of specimens for each species, and how the biodiversity of the nominated property compares with that of other tropical forests in the region, such as those on the Malay Peninsula. Borneo or Sumatra.

Conservation measures

Active conservation and maintenance measures are implemented in the forest. Fallen trees are cleaned up, cut down and replanted only when necessary to support rapid regeneration. Trails are also maintained and upgraded to reduce soil compaction.

The nomination dossier provides an account of the conservation, maintenance, and adaptation of certain building components in the Administration Building and the Villa Aromatica. Meanwhile, several wooden houses have been demolished and reconstructed, some with reinforced concrete structures, and others are now planned for demolition to make space for an arboretum.

The FRIM FPS staff maintains and monitors landscape elements such as ponds, alleys and roads.

ICOMOS considers that old buildings within the nominated property also attest to its layout, based on the design of a rubber estate, and its historical development, thus contributing to reflecting the heritage significance of the nominated property. It is concerning that wooden buildings have been demolished without any prior documentation, and it is recommended that the staff of the nominated property be augmented with a conservation architect to oversee the documentation, conservation, and rehabilitation of old buildings within the nominated property.

An archive of the documentation of all buildings, structures, and human-made landscape features within the nominated property should be established. The documentation should be carefully collected and ordered to serve as a knowledge and reference base for any future interventions.

Monitoring

The monitoring system defines indicators to monitor the state of conservation of the main identified attributes: the human-made tropical rainforest and the historic estate layout.

ICOMOS considers that the indicators used to measure the trends in the state of conservation of the elements forming the historical estate layout are not sufficiently developed. They need to be further detailed based on a systematic inventory of the historical buildings, structures, road and trail network, and landscaped features.

ICOMOS considers that further systematic inventory and documentation of the built heritage of the nominated property and its state of conservation should be developed to ensure proper management, maintenance and monitoring of surviving historical buildings and facilities. It is also advised to assess the transformations that have occurred over time and to determine whether these are consistent with maintaining the legibility of the historical layout of the nominated property, which reflects an early 20th-century British-Malay rubber estate. Such an assessment would inform conservation, rehabilitation, and adaptation of the nominated property, integrating the objective of maintaining or restoring the legibility of the historical layout. ICOMOS finally considers that the documentation of biodiversity should be completed.

5 Protection and management

Legal protection

The nominated property is protected under the National Heritage Act (Act 645) of 2005, which sets out the framework for protecting and conserving national heritage. This Act also sets out an administrative and management framework.

Since 1925, the nominated property has received several statutory protective designations, including its designation as a Reserve for Public (Official) Purposes (1926, Gazette Notification 5449). In 2009, it was designated a Heritage Site. In 2012, it was granted the permanent FRIM Land Title, strengthening the 1926 designation. In 2015, it was declared a National Heritage Site.

In addition to the National Heritage Act, other relevant laws include the 2016 Forest Research Institute Malaysia Act (Act 782), the 2010 Wildlife Conservation Act (Act 716), the 2008 International Trade in Endangered Species Act (Act 686), and the 1976 Town and Country Planning Act (Act 172).

FRIM FPS is not subject to local planning provisions and is managed according to its mission and its instruments. In particular, the final version of the Conservation Management Plan (February 2025) presents three different Protection Zones: Zone 1 envisages forest conservation; Zone 2 envisages building conservation, recreational and educational tourism; Zone 3 defines a controlled development area to enhance the nominated property. ICOMOS notes that the area of the nominated property destined for controlled development is large compared to the whole size of the FRIM FPS and should be considerably reduced in extent.

The regulations of the buffer zone depend on local authorities and other entities, such as the Selangor Forestry Department. The northern section of the buffer zone is protected as part of the Bukit Lagong Forest Reserve (BLFR). The Selayang Municipal Council implement protection of the BLFR through the Local Plan of Selayang Municipal Council 2030. Its southern section is regulated by the Local Plan of Selayang Municipal Council 2030 and Kuala Lumpur Structure Plan 2040. Both plans are said to include provisions for development control and protection of the nominated property.

In the interim report, ICOMOS requested additional information on the protective measures for the buffer zone. In February 2025, the State Party provided additional information on the provisions for the buffer zone as planned by the Local Plan of Selayang Municipal Council 2030. The provisions refer to the obligation of obtaining planning permission and of ensuring that the height of the planned developments in the buffer zone does not impair the views towards or from the nominated property. The tertiary zone to the south of the nominated property already falls under the same provisions.

ICOMOS observes that these provisions are not tailored to safeguard the attributes of the potential Outstanding Universal Value and would need to be complemented by additional measures that ensure effective protection from development on the southern side of the buffer zone.

With regard to the northern part of buffer zone, located within the BLFR, ICOMOS does not consider that, at this stage, the forest reserve status represents a sufficient and effective layer of protection. Quarrying was allowed in the BLFR in the past, and additional concessions might have been already approved, which could result in a significant reduction of the forest cover in the immediate setting of the nominated property in the future.

Finally, a small portion of the nominated property appears not to be subject to the protection regimes enjoyed by the FRIM FPS, but to the planning regime dedicated to the buffer zone. While this requires clarification, it also raises concerns with regard to the robustness of the protection status of the nominated property.

Management system

As a federal government agency regulated by an Act of Parliament, the FRIM FPS holds full power and responsibility for managing the nominated property. The organisational chart of the FRIM FPS envisages a Director General assisted by two Deputy Directors General, each in charge of one main sector: Research and Development, and Operational and Corporate Affairs. Each sector is further articulated into five divisions. Directly under the Director General falls the Research Planning Division. The sectoral divisions mostly in charge of protecting the proposed Outstanding Universal Value are the following: Forestry and Environment, Forestry Biotechnology, Forest Biodiversity and Administration. The Malaysian Federal Government contributes to the functioning and capital investment budgets of the FRIM FPS. The Research Institute also generates income from entrance fees, and sales of goods and services.

The staff includes trained professionals with a variety of profiles, including landscape architects, civil engineers, and mechanical engineers.

ICOMOS notes that no conservation architect is mentioned among the staff and advises that a position for a conservation architect dedicated to monitoring and maintenance programmes of historical buildings should be integrated into the organisation.

If the nominated property is inscribed on the World Heritage List, it is intended that a World Heritage Office (FRIM FPS-WHO) will be established as a new entity in the organisational structure of the FRIM FPS. Three areas of management will be covered: Outstanding Universal Value Monitoring; Heritage Management; and Outstanding Universal Value Protection. The Director and staff of this Office should be familiar with World Heritage requirements and will be called upon to implement the Conservation Management Plan (CMP). The FRIM FPS-WHO will be the operational arm of the Research Institute to ensure the safeguarding of the proposed Outstanding Universal Value should the nominated property be inscribed on the World Heritage List. It will also act as a focal point for external stakeholders, federal, state and local governments, and UNESCO on all issues related to the World Heritage status. Given its strategic role, the FRIM FPS-WHO will be placed directly under the office of the Director General.

The FRIM FPS Heritage Steering Committee (FRIM FPS-HSC) will also be established. The chairman will be the Secretary General of the Ministry of Tourism, Arts and Culture (MoTAC); the members will include the Directors General of Tourism Malaysia and the Department of National Heritage (MoTAC), relevant Selangor State Agencies, the Ministry of Natural Resources and Environmental Sustainability through its departments, and the Kuala Lumpur City Hall. The tasks of the FRIM FPS-HSC cover the approval and support of the nominated property in the policies for sustainable development, review of the protection of the buffer zone and the nominated property, providing governance, review of the

funding for the nominated property, and deciding disputes among stakeholders.

A FRIM FPS Heritage Coordinating Committee (FRIM FPS-HCC) will also be created. Chaired by the Director General, this committee will review quarterly reports, protect and manage the implementation of the CMP, and allocate annual funding from the FRIM FPS budget and adequate staff to the FRIM FPS-WHO.

The draft CMP was appended to the nomination dossier, and its finalised version was shared as part of the additional information of February 2025. The final CMP includes most of the information provided in the nomination dossier. The management system includes provisions stemming from the relevant legislation. Four strategies are envisaged for management planning, each articulated in several policies: protection of the human-made forest, conservation of the landscape, conservation of the live-in community, and visitor management. For each policy, respective actions are indicated, along with the status of action, responsible entity, and monitoring indicators. Synthetic methodological guidelines for the repair, restoration and adaptive re-use of historical buildings are provided and include guiding principles, objectives and preferred materials.

The CMP also includes a chapter on future development, which mentions the creation of future potential facilities, including a visitor centre, an environmental educational centre, a museum of the Forest, a Horticulture Bazaar, a forest boardwalk and two observation decks, as well as three community facilities. View cones have also been identified.

ICOMOS considers that all these development projects need to undergo an independent Heritage Impact Assessment to assess potential negative and cumulative impacts on the attributes of the potential Outstanding Universal Value and their potential to increase visitor numbers, which the State Party observes to have reached its ceiling (500,000 people per year).

Visitor management

The nominated property has always been open to the public for recreation and education. However, increased numbers of visitors have negatively impacted the nominated property and, indirectly, some of its attributes (in particular because of soil compaction).

In 2016, the number of visitors was reduced to 500,000 persons per year to ensure the recovery of soil and trails. The CMP considers that the nominated property may be at risk if the number of visitors exceeds half a million per year. It is noted that the number of visitors can vary from one section of the FRIM FPS to another.

The CMP sets out a Policy for Visitor Management that envisages a periodic review of the carrying capacity of the different areas of the nominated property, promoting a green transportation system and discouraging private vehicular access.

ICOMOS requested additional information in the interim report on how visitor pressures are addressed in the nominated property and whether carrying capacity studies have been conducted. The State Party replied by sharing an excerpt of the visitors' Code of Conduct, which sets out the rules to be observed by visitors to the FRIM FPS. Hiking and mountain biking are allowed at specific places and trails. However, the latter are not clearly identified in the Code of Conduct, leaving uncertainty about which trails can be used for mountain biking.

ICOMOS considers that, given the issues related to soil compaction and potential soil erosion at other sites, mountain biking should not be allowed within the nominated property.

Overall, ICOMOS considers that the management of the nominated property is oriented towards recreational activities rather than conserving and protecting the biodiversity of the FRIM FPS.

ICOMOS also considers that, while allowing access to and favouring educational activities in the nominated property is essential to raise awareness among citizens and tourists about the importance of protecting forest biodiversity, the proposed activities do not necessarily contribute to delivering an appropriate message sustaining the long-term conservation of the nominated property.

Therefore, ICOMOS recommends the development of a heritage value-based visitor management for the nominated property focused on its potential global significance and aimed at reducing the impacts of visitors on the ecological processes of the forest.

Community involvement

The nomination dossier indicates that the community living on-site has been informed about the nomination process through the FRIM Housing Committee and supports it.

ICOMOS observes that information and involvement should have been extended to the residents of the buffer zone. In the additional information of February 2025, the State Party indicated that the community living on-site had been consulted throughout the nomination process and supported the nomination. It also clarified that no Indigenous People live in the nominated property, but that those living outside the buffer zone in the Kampung Orang Asli Bukit Lagong have been harvesting fruits in the small orchards of the nominated property since the 1920s. However, the State Party did not mention whether Indigenous People holding use rights have been involved in the nomination process, nor whether Free Prior and Informed Consent has been obtained. This requirement is set out in paragraphs 64 and 123 of the Operational Guidelines for the implementation of the World Heritage Convention. Therefore, ICOMOS considers that this process needs to be documented, and its outcome enclosed in the nomination dossier.

ICOMOS suggests that more substantial involvement of the Indigenous People using the nominated property for fruit

harvesting should be planned and implemented by the State Party.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the nominated property is legally protected according to the relevant Malaysian heritage legislation. The managing institution holds the necessary powers and responsibilities to implement appropriately the legal and management framework. The protection and planned zoning of the nominated property does not stem from local planning regulations, but is embedded into its protected status and described in its Conservation Management Plan. An ad-hoc management structure for the nominated property is envisaged and will be established upon its inscription on the World Heritage List. A Steering Committee (FRIM FPS-HSC) and a Coordinating Committee (FRIM FPS-HCC) are also planned, to ensure that all relevant entities at the federal, state and local levels are involved in the governance of the nominated property. Therefore, theoretically, the nominated property is equipped with an adequate array of protection mechanisms. However, ICOMOS has noted some shortcomings in the implementation of protection measures, i.e., the possible change of protection regime for one portion of the nominated property, an excessively large area allocated for recreational facilities development, and the possibility for mountain bikers to use unspecified trails within the nominated property. This suggests an inconsistency of approach in implementing the protection and management measures that should, first of all, guarantee the long-term protection of the attributes conveying the potential Outstanding Universal Value rather than promoting increases in visitation, which, according to the State Party, has already reached its maximum capacity.

The northern sector of the buffer zone is granted forest reserve status. However, the protection status of the BLFR has allowed for the opening of quarries with a possible future increase of this activity, and the potential, if not already completed, degazettement of a portion of the BLFR and possibly of the nominated property too. Therefore, ICOMOS observes that the protection status of the buffer zone and immediate setting of the nominated property does not appear sufficiently secured and firm to provide the necessary added layer of protection to the nominated property.

Hence, ICOMOS does not consider that, at this stage, the protection and management system is effective enough or firmly secured for the long-term protection of the nominated property and would need to be strengthened.

Finally, ICOMOS considers that the State Party should offer opportunities for more substantial involvement of the Indigenous People associated with the nominated property in the nomination and management process.

6 Conclusion

Located in the outskirts of Kuala Lumpur, the Malaysian capital city, the Forest Research Institute Malaysia Forest Park Selangor (FRIM FPS) is a mature human-made tropical rainforest resulting from an early reforestation experiment implemented over decades since the 1920s on heavily tin-mining-degraded land. It has been nominated under criteria (ii) and (v) because it is deemed to illustrate a scientific experiment that recreated a forest on severely depleted land and to represent a cultural landscape blending British colonial and local Malay design and architectural features of a typical rubber estate. As such, it would be seen as the combined work of humans and nature, for which both scientific method and local knowledge have been applied.

While the nominated property demonstrates potential for inclusion in the World Heritage List, ICOMOS has also noted some shortcomings in positioning the nominated property in its historic, scientific and cultural context and, therefore, in accurately appraising its potential global significance and in identifying the most appropriate criteria to reflect its potential justification for inscription.

Hence, the selected criteria could not be justified, either because sufficient evidence is lacking, in the case of criterion (ii), or because the justification does not match with the wording and rationale of criterion (v). However, ICOMOS considers that it has the potential to justify criterion (iv) if further information is provided on the regional and global historic-cultural context in which the experimentation at the FRIM FPS took place.

The conditions of integrity and authenticity are not demonstrated at this stage. The current development pressures in the immediate setting of the nominated property, including a potential significant expansion of the quarrying activity in the Bukit Lagong Forest Reserve (BLFR) that would lead to the loss of a significant part of its forest cover, threaten the integrity of the nominated property and require prompt action to redress negative impacts. In addition, the protection status and regime of a small portion of the nominated property to the east of its boundaries are unclear and would need to be clarified.

As underlined in the Conservation Management Plan, the BLFR has a strong historical and functional connectivity with the nominated property. Therefore, ICOMOS recommends that the buffer zone be expanded to include the whole of the BLFR. Development pressures from the urban area to the south of the nominated property necessitate the expansion of the buffer zone towards the south-east and the development of appropriate protection mechanisms. The presence of quarries, along with the possible granting of some twenty additional concessions within the BLFR, raises concerns about the effectiveness of the current protection and management system for the nominated property and its immediate and wider setting. The State Party is recommended to suspend the quarrying concessions and progressively remove quarrying activity from the BLFR, given its functional

connectivity with the ecological processes of the nominated property.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of the Forest Research Institute Malaysia Forest Park Selangor (FRIM FPS), Malaysia, be **referred back** to the State Party to allow it to:

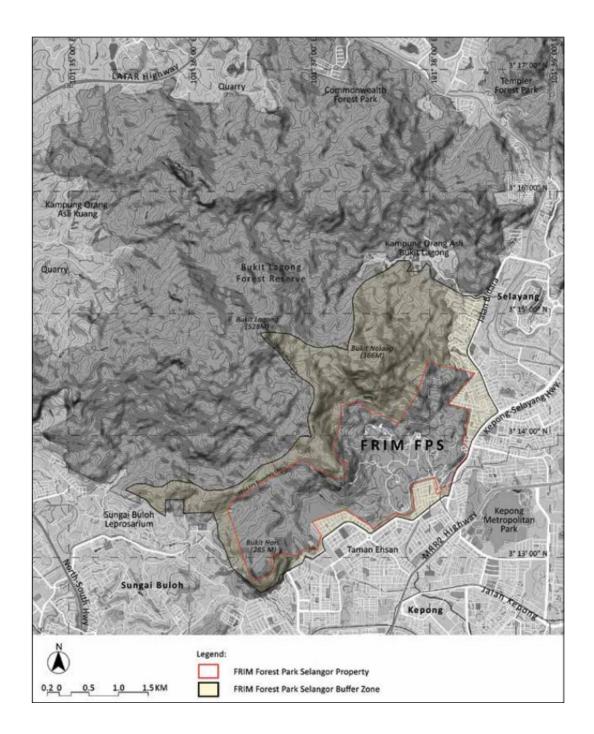
- Provide further information on the regional and global historical-cultural context in which the experimentation at FRIM FPS took place and fully develop the arguments for a revised justification for inscription on the basis of criterion (iv),
- Withhold the concessions for opening additional quarries in the Bukit Lagong Forest Reserve and prepare an action plan to progressively remove all quarrying activity from it,
- Expand the buffer zone to include, northwards, the entirety of the Bukit Lagong Forest Reserve to sustain the functional connectivity with the nominated property, and provide an additional layer of protection, and, southwards, the tertiary zone,
- Clarify the protection status and regime of the small triangular portion of the nominated property to its eastern side, indicated on the map entitled "Amendment FRIM FPS - BPK 4.1: Selayang Utama, Land Use Zone RTMPS 2030 (Replacement)" provided in the Local Plan of Selayang Municipal Council 2030;

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Developing additional protection measures that ensure effective protection of the attributes of the potential Outstanding Universal Value from development in the southern part of the buffer zone,
- b) Strengthening the protection and management system in order to guarantee that it is effective for the long-term protection of the nominated property,
- Integrating a conservation architect into the staff for the monitoring and maintenance programmes of historical buildings,
- d) Considering reducing the extension of Zone 3 controlled development area – as it appears comparatively large vis-à-vis the whole size of the FRIM FPS,
- Establishing an archive of the documentation of all buildings, structures, and human-made landscape

- features within the nominated property, and collect documentation as a knowledge and reference base for any future intervention,
- f) Systematically inventorying and documenting the built heritage and its state of conservation in the nominated property to ensure proper management, maintenance and monitoring of surviving historical buildings and facilities,
- g) Assessing the transformations that have occurred over time and determining whether they have maintained the legibility of the historical layout of the nominated property,
- h) Further documenting the biodiversity of the nominated forest,
- Developing a heritage-value-based visitor management focused on the potential global significance of the nominated property and aimed at reducing the impact of visitors on the ecological processes of the forest,
- j) Ensuring more substantial involvement of the Indigenous People associated with the nominated property in the nomination and management processes.



Map showing the boundaries of the nominated property

Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom (Nepal) No 1741

1 Basic information

Official name as proposed by the State Party

Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom

Location

Lumbini Province Nepal

Brief description

Located on the eastern bank of the Banganga River in the western Terai region of Nepal, the nominated property preserves archaeological remains of a settlement that developed into an urban form in the 6th century BCE. Centred on a fortified "citadel" designed on a grid-plan layout and with a Central Walled Complex at its heart, it included also residential and industrial areas, as well as spaces dedicated to spiritual life, built at different stages of the development of the place, which by the 1st or 2nd century CE started to be gradually abandoned. The archaeological evidence documented mostly through geophysical survey and limited targeted excavation testifies to the urban-focused development of the Early Historic period, the time of birth and spread of the teachings of Buddhism.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a site

Included in the Tentative List

23 May 1996

Background

This is a new nomination.

In 1992 an initial nomination of "Lumbini: Archaeological Sites in Nepal Associated with the Life of Lord Buddha" was examined by ICOMOS. At that time, a serial property was nominated, featuring Lumbini Sacred Garden, Ramagrama and Devadava, as well as Tilaurakot and several associated sites located in its vicinity. These associated sites included Kudan, Gotihawa and Pipari, Niglihawa and Araurakot, as well as Sagrahawa, which together with Tilaurakot were then named the "Kapilavastu Kingdom". ICOMOS recommended to defer the nomination and suggested reformulation of the proposal to cover only the sites of Lumbini and Tilaurakot.

The World Heritage Committee examined this initial nomination at the 17th session of its Bureau (Cartagena, 1993) and deferred the nomination (WHC.93/CONF.002/2). The State Party was advised to combine the sites of Kapilavastu (Tilaurakot) and Ramagrama with Lumbini and propose them as a serial nomination.

In 1996 a new nomination of "Lumbini, the Birthplace of the Lord Buddha" was submitted by the State Party of Nepal for evaluation as an individual site. Concurrently, Tilaurakot and Ramagrama were included on the Tentative List of Nepal as individual sites. In light of the earlier recommendation to combine Lumbini with Kapilavastu (Tilaurakot) and Ramagrama as a serial property, ICOMOS recommended inscription of this new nomination, whilst Kapilavastu (Tilaurakot) and Ramagrama were to undergo further research and preparation of conservation and management plans in order to be nominated at a later stage as significant boundary modification to Lumbini; a change of name indicating the association of all three with the life and work of the Lord Buddha was anticipated. The property was inscribed on the World Heritage List on the basis of criteria (iii) and (vi) at the 21st session of the World Heritage Committee (Naples, 1997).

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 30 September to 6 October 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 24 September 2024 requesting further information about the proposed Outstanding Universal Value, attributes, comparative analysis, boundaries, and local communities.

Additional information was received from the State Party on 12 November 2024.

An interim report was provided to the State Party on 19 December, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the justification for inscription, sites associated with Tilaurakot, the nomination strategy, and pilgrimage.

Additional information was received from the State Party on 27 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property is located on the eastern bank of the Banganga River, north of the town of Taulihawa, in the Greater Lumbini Area, western Terai region of Nepal. It preserves archaeological remains of an urban form that developed in this place in stages from the 6th century BCE and was centred on a fortified "citadel", with additional residential and industrial areas, religious complexes and other monuments surrounding it at a distance.

The earliest evidence of human settlement on the site dates to the 8th century BCE, as testified by timber architecture discovered within the area of the later fortified "citadel", and remains of residential structures identified to the north (Northern Suburb) and southwest of it (area today buried under the modern Shivagarh settlement). In the 6th century BCE, the "citadel" was laid out and gradually fortified, suggesting the presence of significant centralised control and urban planning. A brick wall with a rampart punctuated by gateways, later strengthened by the provision of towers, was erected in the 1st-2nd century CE. A grid-plan layout of the fortified "citadel" included open areas and plazas as well as a system of mud roads of different width. The fortified "citadel" was encircled by a single moat to the west, and a moat with a channel to the east and south, the Banganga River flowing on the northwest side. In addition, the eastern moat had a timber palisade.

The construction of the Central Walled Complex – possibly a palatial enclave – inside the "citadel" started around the 4th-3rd century BCE; the Complex had a multiphased occupation. It was equipped with four access points at cardinal directions and a monumental northern entrance with a gate tower and a forecourt. West of the Complex, a brick-lined water pond/tank was found, dating to the same period. Around the 1st century CE, brick structures were added within the Complex.

South of the "citadel", an industrial area (Southern Industrial Zone) was created around the 4th century BCE, as testified by a large expanse of metalworking and furnace debris found on site.

In the 4^{th} - 3^{rd} century BCE, two stupas (Twin Stupas) were constructed north of the "citadel" through a series of brickbuilt concentric rings.

Around the 3rd century BCE, a monastic establishment (Eastern Monastery) was added east of the fortified "citadel", and a stupa (Eastern Stupa) similar in style to the Twin Stupas was erected nearby. Three brick-lined ponds/tanks were dug to the east and southeast of the monastic complex.

The city possibly started to decline around the 1st-2nd century CE to be successively abandoned by the 7th to 10th century CE; some major new constructions still took place within the walled "citadel" around the 5th century CE. Some periodic activity has been then observed in the 17th century CE. Later in the 19th century CE, the Samai Mai Shrine dedicated to a local deity was erected within the "citadel". Today the shrine remains an active (Hindu) place of worship.

The nominated property has an area of 102.67 ha, and a buffer zone of 1,111.91 ha.

The archaeological site of Tilaurakot has been interpreted since the end of the 19th century CE as the ancient city of Kapilavastu, known from historical sources. The interpretation is based largely on two Chinese travelogues (by Faxian and Xuanzang). Archaeological evidence proves existence of a planned settlement at Tilaurakot around the 6th-5th century BCE, the time when the historic Kapilavastu was the capital of the Shakya Kingdom, but there is no evidence that would allow direct affiliation of the architectural remains at Tilaurakot with Kapilavastu of the Shakyas. The son of king Śuddhodana of the Shakyas, Prince Siddhartha Gautama, is known to have lived in Kapilavastu until he renounced his royal life at the age of 29 to seek enlightenment, later to become Lord Buddha.

In the additional information provided in November 2024, the State Party explained that the nominated property falls within a territorial network of other Early Historic period settlements and monastic sites, of which Lumbini, Dohani and Gotihawa in Nepal, and Ganwaria and Piprahwa in India can be attributed to the period associated with the Shakyas. Within Tilaurakot, the following features can be dated to the 6th-5th century BCE: the cardinally oriented plan of the "citadel", features of the defensive system, and occupation around Shivagarh and the Northern Suburb (which started around the 8th century BCE).

Furthermore, the State Party reported on the newest discoveries at Tilaurakot, the most important of which are: a potential additional residential suburb identified to the south of the Southern Industrial Zone based on geophysical survey, not yet dated; and an apsidal temple, provisionally dated to the 1st-2nd century CE, uncovered within the Central Walled Complex. The apsidal temple has been partly damaged by later occupation but is of particular importance, as this type of architecture has only been found thus far at sites of high significance for Buddhism.

The focus of the nomination is the Early Historic period (6th century BCE – 1st-2nd century CE), even if the name of the nominated property refers to the Shakya Kingdom which covers a much shorter time span. The Shakya Kingdom was absorbed by the Kingdom of Kosala around the 5th century BCE and later incorporated into the Mahajanapada of Magadha. This process was completed in mid-3rd century BCE. No traces in the archaeological material of Tilaurakot indicate any decline in the functioning of the city or even allow to distinguish the

Shakya period from the Kosala period. Accordingly, the two periods are treated together in the nomination dossier.

The State Party also confirmed that it is not possible at this stage to map a clear sequence of historical developments at Tilaurakot. Further research is necessary to get a better understanding of the extent of the urban form at different periods; the nominated property is currently reflecting the known extent of the identified structures dating between the 8th century BCE and the 5th century CE.

In the additional information of February 2025, the State Party explained that there are very few architectural structures preserved within South Asia which can be directly associated with the life of Prince Siddhartha Gautama/Lord Buddha. Based on the building activities at Tilaurakot, it can be assumed that the settlement was considered to be the hometown of the Buddha from the Mauryan period at the latest, and was a pilgrimage destination ever since, with a clear interruption of veneration activities between the 10th century CE, when the site was abandoned, and the 19th century CE, when it was rediscovered, which is similar to all the great sites of Buddhist significance in mainland South Asia for reasons thus far unexplained. The lack of tangible evidence related to the Buddha before the Mauryan period is also not atypical for other major Buddhist archaeological sites, Lumbini being apparently the only exception.

The State Party further emphasised the fact that Tilaurakot is the only known fortified city identified in the region, other key sites representing rather the remains of villages, smaller towns, or sacred sites. Accordingly, the dating of architectural remains at Tilaurakot to the lifetime of the Buddha, the lack of other major cities in the vicinity, and the relative proximity of Lumbini are, according to the State Party, factors supporting the claim of Tilaurakot being Kapilavastu. It has further been clarified that the clay sealing mentioning the Shakyas, discovered in the Central Walled Complex, dates from the 2nd century BCE, which suggests that while the Shakya Kingdom was short lived, the identity of its people in cultural memory continued for many centuries.

The State Party also shared a set of maps demonstrating phases of the development of the city based on the dating of the identified structures.

ICOMOS considers that the presentation by the State Party of the archaeological remains documented at Tilaurakot is devoid of broader historical context and done in a cultural vacuum, which does not allow to appraise the significance of the urban form within the frame of the relevant developments in the region at any particular stage.

ICOMOS further considers that the scholarly debate on the interpretation of the site as the ancient city of Kapilavastu continues since the end of the 19th century and the present state of research does not allow to unanimously accept or reject the presented claim. While ICOMOS notes the fact that Tilaurakot is currently the only known archaeological site in the region which could be interpreted as Kapilavastu due to its scale and complexity, this negative evidence constitutes an indirect association between the site and the historic city, and by extension also an indirect association with the life of the Buddha.

State of conservation

The site was identified in the 1890s and excavated for the first time in 1899. Regular archaeological works then took place in the 1960s-1970s, the 1990s, and have been continuing annually since 2014. In 1997 and 1999, a complete geophysical survey of the "citadel" was undertaken, and additional surveys were conducted in 2014 and 2023 around the Southern Industrial Zone.

Conservation works accompanied archaeological investigations. In 1972-1973 they focused on the Twin Stupas and in the 1990s on the archaeological elements excavated within the fortified "citadel". Between 2005 and 2013, the fortification wall was conserved and a fence was erected around it. Since 2017, various other targeted conservation activities have been undertaken in different parts of the site.

Most of the archaeological remains are buried and have never been excavated. Exposed sections of the fortified area were reburied after conservation, with a layer of brickwork laid over ancient fabric as an interpretive tool. Cardinal grid pattern in the "citadel" is well preserved below ground, only the northern part was damaged in the past by erosion caused by the Banganga River. Raised wooden pathways were laid on the alignments of the ancient grid street plan for ease of interpretation.

Ancient moats have been partly covered by a bitumen road running around the fortified area. There are plans to remove the road; vehicular traffic on it has been restricted.

Outside the "citadel", the Twin Stupas have suffered from water damage with only their bases remaining intact. Despite this, they continue to serve as a place of veneration for Buddhist pilgrims. The remains of the Eastern Monastery and the Eastern Stupa are still underground. The Eastern Stupa is visible as a mound. It has been damaged and requires consolidation.

The archaeological remains of the earliest settlement buried under the modern structures of Shivagarh have suffered from long-time modern-era construction activities. The modern structures are to be removed.

Artefacts from the site are on display at the Kapilavastu Museum, located immediately south of the nominated property, in the buffer zone.

The nominated property is in large part covered with vegetation or agricultural land, which continues to be cultivated.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is satisfactory.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are environmental and anthropogenic.

The main critical factor is flooding caused by rainfall and river overflow, with occasional flash floods posing a threat to the archaeological remains. The riverbed of the Banganga has moved away from the site over the centuries and does not pose a considerable threat at the moment. However, the erosion of the riverbank and uncontrolled sand mining which has been observed below the existing embankment (in the buffer zone) may increase the risk. The sand mining has now been stopped. A potentially greater flood risk may stem from the irrigation canal east of the nominated property, which requires ongoing monitoring. Risks related to sand mining are addressed in the Strategy for Environmental Conservation, and those related to flooding in the Strategy for Disaster Risk Management. accompanying the Integrated Management Framework.

The State Party also recognised the potential threats of development in the catchment area of the Banganga River, which may increase the potential for floods. Watershed management is required to mitigate potential negative impacts on the nominated property.

ICOMOS acknowledges that there is no data related to river flooding and considers that hydrological modelling would be beneficial in planning for protection of the site.

Uncontrolled vegetation growth, especially big trees, the roots of which can disturb underground deposits, also need to be monitored.

Agricultural activities outside the "citadel" could pose a threat if mechanical agriculture is introduced in the future. Infrastructure development, particularly initiatives aimed at improving site accessibility, must be carefully planned to prevent any impact on archaeological material. There is a need to control the expansion of the Samai Mai Shrine and the related services, as well as the potential development of other temples and places of veneration in the future.

Zoning regulations, currently being negotiated with municipalities, will be established to control development within the nominated property and the buffer zone. Within the nominated property no farming will be allowed. Grazing is being considered to control vegetation.

Among the existing modern features that have negative impact on the nominated property are the bitumen road encircling the "citadel", the modern brick wall and fence

erected around it, and electricity cables and masts put up randomly within the nominated property. There are plans to remove the bitumen road and the barriers around the fortified area, but the timeframe for both is yet to be established.

The land surrounding the nominated property is subject to developmental increasing pressures. regulation of land use will be necessary to control commercial activities, including commercialisation of agriculture, expansion of industrial and other developments (the buffer zone already hosts a food processing factory and a large artificial water pond), as well as construction of new monasteries. The combination of these various developments could have significant impact on the integrity of the nominated property, particularly in terms of vistas, and will require Heritage Impact Assessments. A major riverfront development proposed within the buffer zone has recently been stopped.

ICOMOS considers that the state of conservation is satisfactory and that factors affecting the nominated property are currently under control but need monitoring.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated property represents the bestpreserved urban form from the Early Historic period in South Asia, and one whose rural hinterland is almost entirely undamaged.
- With its distinctive architectural style and a variety of architectural forms, it is reflective of the importance of the ancient city of Kapilavastu and the resources of the Shakya Kingdom.
- The nominated property is an important place of historical and contemporary pilgrimage in Buddhism, directly and tangibly associated with the foundations of the history and teachings of Buddhism.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: intramural and extramural planning, defensive architecture, architectural ensemble.

ICOMOS considers that the proposed Outstanding Universal Value is based partly on the assumed association of archaeological remains found at Tilaurakot with the historically attested city of Kapilavastu, which for a short time was the capital of the ancient Shakya Kingdom, and is associated with the early life of the Buddha. This interpretation cannot be confirmed at this stage, as the related scholarly debate has not been settled unequivocally. Furthermore, the Shakya Kingdom,

one of many similar polities that existed at the time in northern South Asia, was culturally, politically, and economically peripheral. Therefore, the potential to demonstrate the significance of the urban form at Tilaurakot based on its potential association for a short period with the Shakya Kingdom is not very strong. The kingdom gained reputational credence mostly through the association with Lord Buddha.

In the interim report, ICOMOS enquired about the "associated" sites which in the initial nomination of "Lumbini: Archaeological Sites in Nepal Associated with the Life of Lord Buddha" were presented together with Tilaurakot as the "Kapilavastu Kingdom". The State Party explained in February 2025 that the current state of research allows to understand Kapilavastu as a city (not a kingdom) that was the capital of the Shakya Kingdom in the 6th-5th century BCE. The "associated" sites, except for Gotihawa, were archaeologically dated to later periods. It is believed that they held economic and perhaps religious links to Kapilavastu, which possibly continued to function as a major urban and religious centre after the demise of the Shakya Kingdom. Gotihawa, while settled during the lifetime of Lord Buddha, is said to bear no evidence of association with him. Accordingly, the State Party did not take these sites into consideration when preparing the current nomination.

The State Party further clarified that it decided to nominate the property individually, and not as a significant boundary modification of the already-inscribed World Heritage property, as a different Outstanding Universal Value, one that highlights both the significance of the site in the life of the Buddha with its qualities as an Early Historic urban development, could be proposed for Tilaurakot.

Comparative analysis

The comparative analysis has been developed around two themes: Early Historic cities and sites associated with the life of the Buddha. In the first group, the State Party has selected for comparison urban forms from South Asia dating to the Early Historic period and Bronze Age and analysed some of them qualitatively based on the existence of specific features that are considered attributes of the proposed Outstanding Universal Value of the nominated property, or lack thereof. In the second group, major sites in Nepal and India associated with events in the life of the Buddha have been itemised. The comparative analysis has examined properties inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

In the additional information sent in November 2024, the State Party explained that within a larger network of local Early Historic period sites, none displays the extent and complexity comparable to Tilaurakot.

ICOMOS considers that a successful comparative analysis should use as its starting point a set of parameters based on the proposed Outstanding Universal Value of the nominated property and the attributes that convey it. In the case of the nominated

property, the proposed Outstanding Universal Value is developed around qualities that are either insufficient to justify the exceptionality of the nominated property (the state of preservation of architecture) or unsupported by tangible evidence (association of Tilaurakot with Kapilavastu, the Shakyas and the Buddha).

ICOMOS also considers that the criteria for selection of comparators are not explained and appear inconsistent (e.g., reasons for inclusion of properties that represent different historical contexts and cultural periods).

Regarding the first proposed theme, ICOMOS considers that the analysis identifies architectural features present at Tilaurakot that do not appear in other places without a clear argument as to how these features convey or not the proposed values, for example, in terms of broader trends in urbanisation, religious life, or socio-political organisation in the Early Historic cities. Moreover, the claim that one site is better preserved than another requires further evidence. Early Historic cities such of Sisulpalgarh (part of the property of Ekamra Kshetra -The Temple City, Bhubaneswar, India, 2014, (i), (ii), (iii)), Rajgir and Chandraketugarh (part of the property Sites along the Uttarapath, Badshahi Sadak, Sadak-e-Azam, Grand Trunk Road, India, 2015, (ii), (iv), (vi)), (India). Mahasthangarh (Cultural Sringaverapura Landscape of Mahasthan and Karatova River. Bangladesh, 2023, (i), (ii), (iii), (vi)), Taxila (Pakistan, 1980, (iii), (vi)) and Anuradhapura (Sacred City of Anuradhapura, Sri Lanka, 1982, (ii), (iii), (vi)) appear to be equally well preserved as the nominated property and have a considerable hinterland as well.

Within the second theme, the analysis emphasises the importance of the nominated property for Buddhist pilgrimage.

In the additional information of February 2025, the State Party explained that although Kapilavastu is not one of the four sites of importance for pilgrimage identified by the Buddha (i.e., Lumbini in Nepal and Kushinagar, Bodh Gaya and Sarnath in India), it survived in the Buddhist cultural memory and teaching as the place where Siddhartha Gautama lived, where the crucial formation of the bodhisattva took place, and as the site of the Great Departure.

ICOMOS also notes that the State Party mainly identified the events in the life of the Buddha that took place in Kapilavastu to justify the religious significance of the site of Tilaurakot. However, no clear explanation has been given of the concepts or teachings of the Buddha that might be associated with the site, in order to justify the influential role it has played in the development of Buddhist doctrine, particularly in comparison to other sites of pilgrimage.

ICOMOS does not consider that the comparative analysis justifies consideration of this property for the World Heritage List at this stage.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iv) and (vi).

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that the nominated property is an exceptional architectural ensemble, showcasing a distinctive range and style of architectural structures and a complexity of urban planning, that represents the best-preserved Early Historic city and hinterland in South Asia. The Early Historic period marks an important stage in the history of the region in the sense that it can be viewed as a period of revival similar to the Era of Integration of the earlier Indus Valley Civilisation, which saw greater complexity and centralised political control in South Asian centres, as well as the development of urban planning and longdistance trade. The nominated property is also said to be the earliest known example from the Early Historic period of the re-emergence of the gridiron plan, based on Indic knowledge system planning models, which was introduced earlier by the Indus Valley Civilisation but codified formally later in the Arthashastra.

ICOMOS considers that while the state of conservation of the archaeological remains at Tilaurakot may be of importance, it is not enough to claim exceptionality of the nominated property on this ground.

ICOMOS also considers that the architecture featured in the nominated property appears to be coherent in terms of styles or forms with other regional developments. The description of the structures suggests a standard Early Historic layout and architectural practice.

Furthermore, ICOMOS considers that while the urban planning of the site is notable, it has not been demonstrated how the architectural ensemble reflects a significant stage in human history, besides being dated to the Early Historic period, which tends to be interpreted by some scholars in terms of dynamics that had been observed in preceding epochs on the Indian subcontinent. Moreover, while it is plausible that Tilaurakot represents the revival of grid-based urban planning after the Indus Valley Civilisation, it has not been explained why it would have occurred at this stage and should be considered exceptional. Moreover, there is no clear evidence that it directly drew from the Indus Valley Civilisation designs, and it was not entirely unique within the larger geo-cultural context.

ICOMOS also considers that the ongoing nature of archaeological studies suggests that current conclusions about the significance of the site may be premature, and further research may throw new light on the development of the urban form at Tilaurakot.

ICOMOS considers that this criterion is not demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance:

This criterion is justified by the State Party on the grounds that the nominated property is closely associated with the early life of Prince Siddhartha Gautama before he renounced secular life and departed on his journey seeking spiritual enlightenment to eventually become Lord Buddha. A place of pilgrimage since ancient times, it is widely believed to be ancient Kapilavastu among Buddhists and venerated as the site associated with the life journey of the Buddha. Accordingly, it is directly and tangibly associated with the foundations of the history of Buddhism and its teachings and linked to other sites in the vicinity associated with the Buddha.

ICOMOS considers that the journey of Lord Buddha to enlightenment is a key narrative in Buddhism, deeply entwined in its history and teachings. It has had a profound influence globally. Kapilavastu, as the city where the Buddha grew up and later departed from on his spiritual journey, is inherently linked to this universally significant narrative. However, there is a contestation about Tilaurakot being Kapilavastu, which cannot be unambiguously resolved at this stage. Accordingly, the association of certain architectural structures preserved at Tilaurakot with the life of Prince Siddhartha/Lord Buddha is inferred based on their dating to the 6th-5th century BCE and is thus not strong enough evidence. Linking them specifically to key events in the life of the Buddha remains speculative.

ICOMOS considers that the presence of religious structures from later periods, which are said to testify to Buddhist pilgrimage and veneration activities, has a stronger potential to demonstrate the association with the life and teachings of the Buddha in a way that could potentially give the site Outstanding Universal Value. However, this evidence needs to be further explored and the argument for the significance of the site on these grounds strengthened, possibly through archaeological excavation, as the documented religious structures do not seem to reflect the proposed association in an exceptional way compared to other similar sites, especially considering the historical and influential role the nominated property is said to have played within the Buddhist cultural realm and the development of Buddhist doctrine. The apsidal temple recently discovered could be of significance in this regard, but it requires further research and dating confirmation.

ICOMOS further considers that, since the site is linked to other sites in the vicinity associated with the Buddha, the State Party should consider proposing it as significant boundary modification of the World Heritage property of "Lumbini, the Birthplace of the Lord Buddha", as has been previously recommended. In such a case, criterion (iii) would need to be considered by the State Party in addition to criterion (vi). If criterion (vi) could be proven to be justified, as stipulated above, and the importance of the

presence of the apsidal temple, as the structure marking sites of high significance for Buddhism, could be confirmed among other religious architecture at Tilaurakot, criterion (iii) could potentially also be justified on the basis of the nominated property being an exceptional testimony to the veneration of the Buddha and his teachings, which constitutes a significant cultural tradition within Buddhism.

ICOMOS considers that this criterion is not demonstrated at this stage.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated, attributes of Outstanding Universal Value cannot be confirmed.

ICOMOS does not consider that any of the criteria have been justified at this stage.

Integrity and authenticity

Integrity

The integrity of the nominated property is based on the wholeness and intactness of the architectural vestiges from the Early Historic period preserved mostly underground.

The boundaries of the nominated property have been drawn to encompass all known archaeological remains identified at Tilaurakot. However, the full extent of the urban form that developed between the 6th century BCE and the 1st-2nd century CE is not yet clear. The uncovered archaeological evidence remains limited, with some of the extramural areas never surveyed or excavated. This suggests that the current understanding of the site is at least partly based on assumptions, and that further evidence could emerge over time. Accordingly, the current boundaries and identified attributes may not fully capture the value of the site as proposed, raising concerns about whether all necessary elements have been included.

The state of conservation of the known archaeological remains is considered satisfactory, although some structures have been badly damaged in the past and the level of preservation of unexcavated vestiges is difficult to assess. Agricultural activities and vegetation growth, particularly outside the fortified "citadel", have caused surface degradation of archaeological structures.

The nominated property includes a few modern structures, which compromise its integrity. A 19th-century Hindu shrine located within the fortified "citadel" was constructed partly with bricks from an earlier temple. It is still actively used by religious communities. Construction of monastic buildings in the southern part of the site and the settlement of Shivagarh disturbed archaeological deposits. The modern structures of Shivagarh will be dismantled. There are also electricity cables and masts put up randomly at the site. A bitumen road around the "citadel" will be removed.

Since the criteria for justifying the potential Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and integrity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated at this stage.

Authenticity

The authenticity of the nominated property is based on the ability of the archaeological remains to credibly express the proposed Outstanding Universal Value through form, design, and materials.

The documented archaeological remains are mostly underground. Modern bricks laid on top of the ancient fabric and raised timber boardwalks constructed in alignments with the ancient grid plan mark the layout of the "citadel". Ancient moats are partially covered today by a bitumen road that partly separated them from the ancient brick wall and the rampart around the "citadel". Platforms for pilgrims to perform their rituals have been provided in some areas.

The current understanding of the Outstanding Universal Value of the nominated property relies heavily on interpretations. The archaeological evidence at Tilaurakot cannot be unquestionably corroborated with the historical accounts of Kapilavastu at this stage of research. The association of Tilaurakot with the secular life of Lord Buddha appears to be weakly substantiated with tangible evidence based solely on the dating of structures in the nominated property.

The ongoing research, recent discoveries, and the fact that only part of the extramural area has been prospected suggest that the understanding of the site and its historical evolution, including the development of the place as Buddhist pilgrimage destination, may still change.

Since the criteria for justifying the potential Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and authenticity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated at this stage.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have not been met at this stage.

Boundaries

According to the nomination dossier, only two inhabitants are believed to currently live within the proposed boundaries. The number of inhabitants in the buffer zone is unclear.

The boundaries of the nominated property mostly follow the perimeter of the Protected Monument Zone, established through the Ancient Monument Preservation

Act 2013 (according to the Hindu calendar, that is 1956 in the Gregorian calendar), but are slightly larger. They have been drawn to include all confirmed subsurface archaeological remains and areas with very high archaeological potential. The boundaries follow roads and agricultural land limits.

The buffer zone was created to protect the known areas of archaeological sensitivity and in general includes the immediate setting of the nominated property to prevent incompatible land uses and protect visual wholeness. For practical reasons, its boundaries follow field boundaries, canals, and roads.

In the additional information sent in November 2024, the State Party explained that areas with archaeological potential but with no detected subsurface remains have been left out in the buffer zone until their potential is confirmed.

ICOMOS considers that undertaking archaeological risk mapping in the buffer zone should provide a better understanding of possible archaeological deposits in the immediate setting of the nominated property and possibly help establish the extent of the urban form at Tilaurakot.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the proposed Outstanding Universal Value based on the identification of Tilaurakot with Kapilavastu, the ancient capital of the Shakya Kingdom where Prince Siddhartha Gautama spent his early years, remains speculative. Deprived of this association, and without a well-established historical and cultural context, Tilaurakot with its architectural ensemble representing the Early Historic urban development lacks a defined supra-national significance that would be rooted in a particular socio-cultural and political climate of the region during the eight centuries of its existence. Moreover, the association of certain architectural structures preserved at Tilaurakot with the life of Prince Siddhartha/Lord Buddha is inferred based on their dating and is thus not strong enough evidence.

The comparative analysis does not justify consideration of this property for inscription on the World Heritage List at this stage. ICOMOS considers that criterion (iv) has not been demonstrated, and that criterion (vi) has not been demonstrated at this stage, and the attributes could not be confirmed. Accordingly, the conditions of integrity and authenticity of the nominated property could not be demonstrated either. ICOMOS further considers that, since the site is linked to other sites in the vicinity associated with the Buddha, the State Party could consider proposing it as a significant boundary modification of the World Heritage property of "Lumbini, the Birthplace of the Lord Buddha", as has been previously recommended, if the religious structures testifying to the veneration of the Buddha at Tilaurakot from the Mauryan period onwards, and in particular the apsidal temple recently discovered at the site, could be proven to reflect in an exceptional way the association of the site with the life and teachings of Lord Buddha and the related pilgrimage practice, to justify criteria (iii) and (vi).

4 Conservation measures and monitoring

Documentation

The available recent documentation consists mostly of a series of archaeological reports that have been produced since 2014. Geophysical surveys were conducted in the area of the "citadel" and the Southern Industrial Zone; it is unclear what type of data has been recorded. An archaeological risk map for the entire nominated property has been prepared, indicating areas which may contain archaeological deposits. It should guide the planning of future developments, land purchase by the government, and land-use regulations. A list of conservation projects has been provided by the State Party, but it remains unclear what type of documentation is available for these works.

All the existing records are kept by the Lumbini Development Trust, Department of Archaeology in the Ministry of Culture, Tourism and Civil Aviation, and the UNESCO office in Kathmandu.

ICOMOS considers that detailed baseline documentation is crucial for any future management and conservation arrangements, as well as monitoring purposes. Disaster risk preparedness for the nominated property should be based on the identified threats in relation to the baseline documentation of the attributes of the potential Outstanding Universal Value.

Conservation measures

The Strategy for Archaeology and Conservation includes basic guidelines for the conservation of the nominated property and details actions to be undertaken on the architectural structures, both excavated and unexcavated.

The Department of Archaeology is responsible for the conservation of the nominated property and the general oversight, while the Lumbini Development Trust is tasked with onsite maintenance.

Annual funding from the government is available for maintenance. Conservation has been thus far funded through the Lumbini Development Trust and international agencies on a project basis.

The modern Thai Monastery in the southern part of the nominated property receives Buddhist pilgrims, thus sustaining the spiritual association of the nominated property with Lord Buddha. The property has been acquired by the State and there is an amicable relationship with the Royal Thai Monastery in Lumbini.

It is unclear to ICOMOS whether a state of conservation assessment of all the attributes of the nominated property has been completed by the State Party to be used as the basis for the development of the conservation programme.

Monitoring

The Department of Archaeology, through the Site Conservation Supervisor, is responsible for monitoring aspects related to the archaeological material and conservation of the site. The baseline for monitoring purposes shall be the state of the nominated property at the time of inscription.

ICOMOS considers that the monitoring system is inadequate in its present form. The provided list of features that are being monitored does not necessarily correspond to the attributes of the proposed Outstanding Universal Value. Moreover, it is not stipulated how regular the monitoring is, what methods are used, and how the indicators inform actions.

ICOMOS considers that a detailed documentation of the attributes of the potential Outstanding Universal Value should form the basis for future management and conservation, as well as development of a relevant monitoring system.

5 Protection and management

Legal protection

The nominated property is protected as a Protected Monument Zone at the national level through the Ancient Monument Preservation Act 2013 (of 1956), with subsequent amendments, and the related Ancient Monuments Preservation Rules 2046 (of 1989). Only its northernmost tip and southern section fall out of the designated protection. The Protected Monument Zone will be extended to cover these outstanding areas. The timeframe has not been stipulated.

The Department of Archaeology in the Ministry of Culture, Tourism and Civil Aviation is responsible for the protection of the site, its research and conservation. This includes prescription of building bylaws and approving permits for any work or construction.

The area of the nominated property is largely State-owned; the plots where subsurface archaeological remains have been identified are being purchased by the government, with plans for the entire property to be State-owned over the coming years. Currently, only some northernmost and easternmost sections are in private ownership. State-owned agricultural land in the eastern part of the nominated property is cultivated. In the southern part there are two monastic buildings – Risshoin Shanti Vihar Japanese Monastery and Kapilavastu Temple Thai Monastery, both of which have been purchased by the State. The first is used as an archaeological storage room, the other still receives Buddhist pilgrims.

The land in the buffer zone is mostly privately owned, except for the Kapilavastu Museum compound, immediately beyond the southwestern perimeter of the nominated property, which is part of the Department of Archaeology, and a forest in the northwestern section of the buffer zone, which is protected under national law but administered by the local communities. The buffer zone is located within Wards no. 3 and 6 of the Kapilvastu Municipality and Ward no. 10 of Buddhabhumi Municipality. It is covered largely by agricultural land and hosts ten settlements. Special regulations related to construction are currently being negotiated with the two municipalities to control potential development.

ICOMOS observes that the Ancient Monument Preservation Act 2013 does not provide legal framework for the creation of a buffer zone. Accordingly, at the moment the buffer zone does not provide any additional protection to the nominated property as the relevant landuse controls are not yet in place.

Management system

At the state level, the Department of Archaeology is the primary authority for the nominated property. It collaborates closely with the Lumbini Development Trust, a non-profit institution established through the Lumbini Development Trust Act 2042 (of 1985). The Trust is responsible for the day-to-day management and maintenance of the nominated property and is represented at the site level by the Site Operations Manager, who works collaboratively with the Site Conservation Supervisor of the Department of Archaeology. A new Monument Conservation Office for the site and the Kapilavastu Museum shall be created within the Department of Archaeology.

The Hindu Samai Mai Shrine is managed by the religious community, in coordination with the Trust.

The buffer zone is managed by the Kapilvastu Municipality and Buddhabhumi Municipality. Currently, there are no urban master plans for the two municipalities due to lack of capacity and resources. A new periodical plan with land-use zoning is needed.

The nominated property falls also within the Greater Lumbini Area planning. An Integrated Master Plan for the Greater Lumbini Area is being planned by the World Bank, which, if realised, will have an impact on the development of the wider setting of the nominated property.

Coordination of activities in the nominated property at the highest level will be ensured by a Steering Committee composed of representatives from the national government and the relevant municipalities. At a lower level, work will be overseen by a Coordination Committee composed of representatives of national and local authorities and experts.

An Integrated Management Framework developed for the nominated property presents a vision for the management of the property, its immediate surroundings, and the wider landscape. It includes an Integrated Plan of Action and several sector strategies that deal with future research and conservation, disaster risk management, and tourism. The disaster risk management strategy includes mitigation measures against climate change impact.

According to the Integrated Management Framework, the buffer zone will be divided into two subzones in terms of land uses. In the green/agriculture subzone, cultivation will continue, and only temporary structures will be allowed. In the controlled development subzone, limited construction will be allowed alongside the existing village activities, provided it does not have negative impacts on the nominated property (including the views).

Heritage Impact Assessment will be adopted into law and will apply in the nominated property and the buffer zone.

In the additional information sent in November 2024, the State Party shared that the final zoning regulations for the buffer zone will be finalised and adopted by mid-2025.

ICOMOS considers that adopting special regulations for the buffer zone is critical, given that the buffer zone has no legal background and there are no relevant municipal master plans or land-use zoning in place. It is, however, unclear to ICOMOS on what basis the subzoning of the proposed buffer zone has been prepared since archaeological risk mapping in the buffer zone has not yet been completed. ICOMOS observes that some areas defined to be of high archaeological risk within the buffer zone are located within the controlled development subzone which threatens integrity of the potential archaeological deposits. It would be important to complete the archaeological risk mapping in the buffer zone and revise the zoning accordingly to ensure that areas with archaeological potential are not subjected to developmental pressures. The scope of agricultural activities in the subzones should also be stipulated, seeing that mechanical agriculture may still pose a threat to the archaeological deposits.

ICOMOS also considers that it is unclear whether the Integrated Management Framework has been already approved and is being implemented.

It is further unclear whether and how the planned Integrated Master Plan for the Greater Lumbini Area will take into consideration the proposed boundaries of the nominated property and its buffer zone, with a view to protecting Tilaurakot, as part of the Greater Lumbini Area and its wider setting, against potential impacts of future development.

ICOMOS also considers that the timeframe for the adoption of Heritage Impact Assessment into the national legal framework is not stipulated. The State Party should ensure that the procedures and format for Heritage Impact Assessment are consistent with the Guidance and Toolkit for Impact Assessments in a World Heritage Context, and that all development projects planned within the nominated property and adjacent areas with

archaeological potential undergo a Heritage Impact Assessment.

ICOMOS notes the creation of a new Monument Conservation Office for the site to capacitate the Department of Archaeology but considers that the staff component of the Archaeological Site Conservation Section proposed in the Integrated Management Framework needs further strengthening, seeing that it includes only one archaeology officer.

Visitor management

The Kapilavastu Museum curates most artefacts from the site. It has basic tourist amenities. Small visitor facilities are also available near the western gate of the "citadel", and in the area of modern Shivagarh. Information boards are only provided within the "citadel". Any new facilities within the nominated property will be limited to non-intrusive and temporary structures. Further development of tourist infrastructure is planned within the buffer zone, in particular around the museum area. Any potential developments will be preceded by a Heritage Impact Assessment.

Lumbini Development Trust is in charge of visitor management. A visitor management plan will be developed, informed by studies to assess the carrying capacity of the site, which are being planned. Guidelines have been included in the Strategy for Visitor Management appended to the Integrated Management Framework.

Local guides have been trained but their services have not been institutionalised yet.

ICOMOS considers that an interpretation strategy should be developed in order to communicate an understanding of the potential Outstanding Universal Value based on available evidence and state of research.

Community involvement

Local populations have been informed and are supportive of the nomination. Individual landowners on whose land archaeological remains were found willingly sold their plots to the State and have been compensated. The communities do not seem to raise issues with relocations related to that process. Relationships with religious communities that use the place appear to be also well established.

A community-based management approach will be introduced to develop ownership and revenue sharing among the community living adjacent to the property. This will be linked to proactive pre-allotment of revenue sharing and workload sharing with the people of the surrounding municipality wards.

According to the additional information received in November 2024, the local communities, including religious communities, were informed about the implications of the nomination. They took part in the development of the Strategy for Community and

Sustainable Development, which addresses needs of the communities living in the buffer zone and the ritual use of the site.

ICOMOS considers that while involvement of local communities in decision-making through the Steering and Coordination Committees has been mentioned, it has not been clearly stipulated how this would be organised and the scope of this involvement.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated property is adequate but needs to be extended to the areas falling currently outside the Protected Monument Zone. Relevant regulations related to land use and control of future development in the buffer zone need to be urgently put in place and be legally binding. The effectiveness of the proposed management system needs to be evaluated, as it requires collaboration of several institutions and religious leaders of different denominations. Sections within the Department of Archaeology responsible for the protection, management and conservation of the nominated property should be capacitated. An interpretation strategy for the nominated property is recommended.

6 Conclusion

Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom, located in the western Terai region of Nepal, preserves archaeological vestiges of an Early Historic urban form. It features remains of architectural structures and public infrastructure, conserved largely underground, constructed between the 6th century BCE to the 1st or 2nd century CE, with additional earlier and later evidence of building activity.

ICOMOS acknowledges the effort made by the State Party in elaborating the nomination dossier and appreciates the work carried out to provide additional information.

ICOMOS considers that at this stage the proposed Outstanding Universal Value is not demonstrated. The nomination poses some key problems with regard to the way it was conceptualised and the archaeological remains at Tilaurakot interpreted.

ICOMOS considers that the identification of Tilaurakot with Kapilavastu cannot be unequivocally confirmed at this stage, as the scientific debates have not been settled. Therefore, drawing conclusions on the significance of Tilaurakot based on its assumed association with Kapilavastu is not fully convincing.

Moreover, both the archaeological remains at Tilaurakot and the history of Kapilavastu lack concrete historical narratives which would include socio-cultural, political, economic, and other aspects characteristic of urban

developments. Further studies might shed new light on the features documented at Tilaurakot and allow to appraise the significance of this Early Historic urban form within the frame of the relevant developments in the region to claim exceptionality of the site within the dynamics specific to the period.

ICOMOS also considers that the journey of Lord Buddha to enlightenment is intertwined with the history of Kapilavastu during the 6th-5th century BCE when it was the capital of the Shakya Kingdom. Given the concerns raised above, the tangible associations with the life of Prince Siddhartha Gautama/the Buddha proposed by the State Party appear to be inferred based solely on the dating of archaeological structures. For ICOMOS, this does not seem to be convincing evidence, especially since archaeological material of Tilaurakot does not allow to distinguish the Shakya period from the later Kosala period.

Due to these problems with justification of the proposed Outstanding Universal Value, ICOMOS cannot at this stage confirm that any of the criteria put forward by the State Party has been demonstrated.

However, ICOMOS considers that the history of pilgrimage and veneration documented at Tilaurakot in the form of religious structures from later periods may provide a stronger basis for developing a potential nomination centred on the association of the site with the life and teachings of Lord Buddha. Nevertheless, this possibility needs to be further explored, possibly through further archaeological excavation, to propose a well-rounded argument for the exceptionality of the site and the influential role it has played within the Buddhist cultural realm. The studies of the recently uncovered apsidal temple may represent a promising step forward in this direction.

ICOMOS further considers that, since the potential to justify Outstanding Universal Value lies at this stage primarily in the association of the site with the Buddha and the development of Buddhist teachings, the State Party should consider proposing Tilaurakot as a significant boundary modification of the World Heritage property of "Lumbini, the Birthplace of the Lord Buddha" (Nepal, 1997), as has been previously recommended.

In conclusion, ICOMOS considers that further work is needed to restructure the line of reasoning based on clearly identified attributes that testify to the presence of Buddhist pilgrimage and veneration that arose at Tilaurakot, believed by the people to be the ancient capital of Kapilavastu as a result of the cultural memory of the life journey of the Buddha. A mission to the nominated property will be necessary once the nomination has been reconfigured.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the examination of the nomination of Tilaurakot-Kapilavastu, the Archaeological Remains of the Ancient Shakya Kingdom, Nepal, to the World Heritage List be **deferred** in order to allow the State Party, with the advice of ICOMOS and the World Heritage Centre, if requested, to:

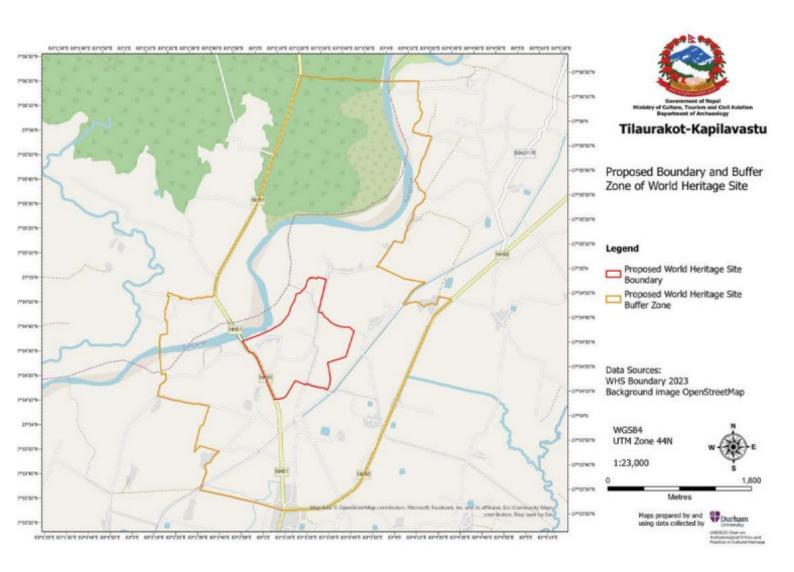
- Complete the investigation of the apsidal temple and provide more accurate dating and history of the structure to strengthen the argument of the significance of Tilaurakot as an exceptional testimony to the veneration of the Buddha and his teachings to justify criterion (iii),
- Pursue further research on the religious architecture at Tilaurakot testifying to the pilgrimage to the site, believed to be the hometown of Lord Buddha from at least the Mauryan period onwards, to demonstrate the exceptional way in which these structures reflect the association of Tilaurakot with the life and teachings of the Buddha and the development of Buddhist tradition, to justify criterion (vi),
- Re-submit the nomination as a significant boundary modification of the World Heritage property of "Lumbini, the Birthplace of the Lord Buddha" (Nepal, 1997);

Any revised nomination should be visited by a mission onsite.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Considering hydrological modelling in planning for the protection of the nominated property against flooding,
- b) Completing archaeological risk mapping in the proposed buffer zone to better understand the archaeological potential of areas surrounding the nominated property,
- c) Ensuring that the procedures and format for Heritage Impact Assessment are consistent with the Guidance and Toolkit for Impact Assessments in a World Heritage Context and that Heritage Impact Assessment is conducted before any development project within the nominated property and the immediate setting that has archaeological potential.



Map showing the boundaries of the nominated property

Petroglyphs along the Bangucheon Stream (Republic of Korea) No 1740

1 Basic information

Official name as proposed by the State Party

Petroglyphs along the Bangucheon Stream

Location

Ulju District Ulsan Metropolitan City Republic of Korea

Brief description

The nominated property is located along the Bangucheon Stream on the south-eastern coast of the Korean Peninsula. It extends for approximately three kilometres along this meandering waterway, in a landscape of stratified cliffs. Within this specific setting, there are two rock panels with remarkable concentrations of petroglyphs: the Daegok-ri Petroglyphs and the Cheonjeon-ri Petroglyphs. The petroglyphs of the nominated property depict a wide range of images engraved by successive generations of local artists, using stone and metal tools, spanning both prehistoric and historic eras, from 5,000 BCE to the ninth century CE.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a site

Included in the Tentative List

11 January 2010, as the "Daegokcheon Stream Petroglyphs"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 26 to 31 May 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 26 September 2024 requesting further information about conservation and flood management, tourism, management and factors affecting the nominated property, ownership and the local communities.

Additional information was received from the State Party on 7 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: conservation and management and the visitor experience.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property consists of a three-kilometre stretch along the meandering Bangucheon Stream (Bangucheon being the historical name of the stream, known for administrative purposes as the Daegokcheon), near the south-eastern coast of the Korean Peninsula. The Bangucheon region's terrain was formed by land uplift around 100 million years ago, creating a landscape of hills separated by a deep S-shaped depression, bordered by rugged rock formations.

The name "Bangucheon" comes from a rocky outcrop whose resemblance to a turtle earned it the name "Bangudae" ("Bangu" meaning "turtle shell"). By extension, the stream took the name Bangucheon, or "Bangu Stream".

Two rock panels with large concentrations of rock carvings can be found at its northern and southern extremities. These two rock panels, flanked by cliffs and surrounded by forest, are known as the Petroglyphs of Bangudae Terrace in Daegok-ri and the Cheonjeon-ri Petroglyphs, respectively. The practice of rock carving in the Bangucheon region was initiated by hunter-gatherers during the Neolithic period. This rock carving tradition was continued by Bronze Age farmers and then by members of the ancient Silla kingdom.

The petroglyphs of the nominated property show a wide range of images engraved by successive generations of local artists, using stone and metal tools, spanning both the prehistoric and historic eras, from 5,000 BCE to the ninth century CE.

Depending on how the sunlight illuminates the rock panels, the petroglyphs are more or less distinctly visible, with the light playing with the depth and composition of the engraved images.

The Daegok-ri panel is the largest rock art site on the Korean Peninsula, at over 30 metres in length. The petroglyphs are mainly concentrated on a rock almost four metres high and eight meters wide. Within this pictorial grouping, 312 petroglyphic figures have been identified. These include 16 anthropomorphic figures, 69 representations of marine animals and 108 land animals. There are also depictions of boats and various tools, including images of nets and other fishing-related tools. Cetaceans are the most represented motif on the Daegok-ri panel, making up almost a quarter of the total number of petroglyphs.

The level of detail of the depictions of animals, both aquatic and land-based, enable the precise species of each animal to be discerned. The whales and stages of whaling depicted in the nominated property illustrate marine fishing practices in prehistoric East Asia.

The Cheonjeon-ri Petroglyphs are distributed on a rock surface 9.8 meters long and 2.7 meters high, located two kilometres upstream from Daegok-ri. Cheonjeon-ri has petroglyphs that are relatively different from those of Daegok-ri, and include nearly 625 elements, mainly geometric patterns such as diamonds, concentric circles and zig-zags, as well as Chinese characters.

All of these animal and human figures, hunting and fishing scenes, geometric patterns and writing were engraved and superimposed on the rock over the centuries. The special appeal of this landscape has endured through different chronological periods, as evidenced by the palimpsest of pictorial and textual carvings on the rock panels of Daegok-ri and Cheonjeon-ri.

These rock panels were discovered in 1970 and 1971.

The nominated property has an area of 43.69ha, and a buffer zone of 144.15ha.

State of conservation

Regular reports on the state of conservation of the rock art panels are published on the website of the National Institute for Research on Cultural Heritage. Few major conservation problems have been reported, and the state of conservation of both panels seems relatively stable.

The main conservation problem concerns the annual floods that affect the Daegok-ri panel. Since the construction of the Sayeon Dam in 1965, the site has been almost completely submerged every year. Before 2013, it was submerged for an average of 151 days per year, raising serious concerns among many stakeholders, in Korea and beyond, about the effects on the site.

In 2014, in response to these concerns, the government and K-Water (the national water authority) decided to

artificially lower the water level of the Sayeon Dam to 48 metres. Since then, the site has been submerged for 42 days per year on average, which is a significant improvement. However, the threat to its conservation remains significant.

The national and local governments, together with K-Water, have now developed a plan to effectively eliminate the risk of future flooding.

These petroglyphs in the open air are at risk of damage from the weather and the stratified rock shows an advanced level of jointing, meaning that it is likely to be exposed to the phenomenon of exfoliation. The two rock panels of Daegok-ri and Cheonjeon-ri have been placed on the list of heritage sites for intensive monitoring.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is stable.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factor affecting the nominated property is the annual flooding of the Daegok-ri panel. The central government has committed \$47.2 million to widen the spillway and install new 47-metre-high gates. The evacuation tower will also be strengthened and upgraded to bring the dam into compliance with modern earthquake resistance standards.

The redevelopment of the Sayeon Dam, and the ability to mitigate flood water flows using the dam, will guarantee long-term protection for the Outstanding Universal Value of the nominated property.

ICOMOS also notes that, after completion of the dam, the rock art panel could be exposed to a drying out phenomenon. The State Party was asked in the interim report to provide more information on how this environmental change and its potential impact on the petroglyphs would be monitored.

Aware of these potential impacts, the State Party responded that it continuously monitors factors such as changes in colour, biological alterations, exfoliation and erosion of the nominated property. Experts dispatched by central government regularly review the state of conservation of the nominated property. Automated monitoring devices have been installed on site to observe the rock panels. Conservation analyses and 3D scans are regularly carried out by the local authorities. As well as these existing programmes, the State Party is pursuing a project to establish an artificial intelligence-based monitoring system in order to respond more effectively to environmental changes around the nominated property.

ICOMOS also stressed that climate change poses a significant threat to the nominated property and asked the

State Party to explain how these impacts will be monitored and mitigated.

The State Party responded that the Korea Heritage Service had recently announced a heritage protection roadmap to address the effects of climate change, by publishing the Climate Change Master Plan for National Heritage (2023-2027). This document sets out objectives for a more effective response and systematic protection of national heritage from the effects of climate change. The stated objectives include strengthening response capacities by deploying technology, consolidating the role that national heritage can play in achieving carbon neutrality, as well as developing systematic mechanisms for monitoring and responding to the climate crisis.

Furthermore, a range of natural and human factors have been identified, such as wild animals, vegetation, rain, earthquakes and forest fires (natural factors) and new construction, damage caused by visitors, tourism infrastructure, road extensions and quarrying (human factors).

ICOMOS considers that the state of conservation is stable and that factors affecting the nominated property are taken into account thanks to measures designed to maintain this state of conservation.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The petroglyphs of the nominated property show a varied range of images engraved by successive generations of local artists, using stone and metal tools, spanning the prehistoric and historic eras, from 5,000 BCE to the ninth century CE.
- The animals, human figures, hunting scenes, concentric circles, diamonds and writing carved into the rock show high levels of realism and dynamism, whilst displaying a distinctive composition of figurative images and text. In particular, the images of animals, both aquatic and land-based, are so detailed that the precise species of each animal depicted can be recognised.
- The engraved images and textual inscriptions of the nominated property are testimony to the art and culture of their creators and their creativity.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the huge range of engraved images, the high level of artistry, the varied motifs and the exceptional sense of aesthetics, as well as the tradition of the rock art having lasted for around 6,000 years.

ICOMOS notes that there have been discussions among experts about the fact that many other sites have engravings of whales, and that it is not completely clear whether the nominated property displays a representation of the different stages of whaling. However, ICOMOS believes that, unlike the representation of certain other specimens, for which the identification of a specific animal species seems more questionable, the various species of cetaceans are clearly recognisable in the nominated property, with at least one example clearly showing a whale impaled by a harpoon.

ICOMOS also believes that, although the dating presented for the nominated property – ranging from the Neolithic period to the Bronze Age and the Silla period – is based on formal, stylistic criteria, the fact that the engravings cannot currently be dated directly does not call this estimate into question, which is even regarded as conservative.

Comparative analysis

The comparative analysis has been developed on the grounds of aesthetic criteria, taking into consideration the themes, the quality of representation and the composition of the rock art sites compared. An analysis of the period of creation and the various stages of human development thus represented was also taken into account. The comparative analysis was also developed by highlighting the under-representation of East Asian rock art on the World Heritage List.

It has examined properties within the Korean Peninsula and East Asia, as well as properties in coastal areas in the rest of the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

East Asian rock art is substantially under-represented on the World Heritage List, and the Petroglyphs along the Bangucheon Stream constitute, according to the State Party, a unique testimony to Neolithic coastal cultures, particularly sea fishing and whaling practices. Unlike the petroglyph complexes of the Mongolian Altai Mountains and the rock art cultural landscape of Zuojiang Huashan in China, this site offers a dynamic and detailed depiction of whaling, which has no equivalent in rock art worldwide.

The analysis of 22 rock art sites on the Korean Peninsula found the Petroglyphs along the Bangucheon Stream to be the only Korean site with such a thematic diversity of motifs with such a high level of realism, bearing witness to the evolution of human development from the Neolithic period to the Silla period.

Among the six East Asian sites looked at (in Russia, Mongolia, Japan and China), only the petroglyphs of Sikachi-Alyan and the petroglyphs of the Mongolian Altai Mountains bear witness to such a long cultural evolution, but they do not have the same density nor are as iconographically diverse as the petroglyphs of the nominated property.

On a global scale, although several coastal rock art sites are listed (in Indonesia, Australia, Mexico, Chile, Norway, Sweden, Spain and Russia), and despite the representation of different themes, and in particular motifs evoking various fishing practices, none demonstrate a level of creativity as high, or cover a period of creation as long, as the nominated property.

The ICOMOS thematic study of rock art sites in East Asia (2019) highlights the specificity of Korean rock art, particularly the Petroglyphs along the Bangucheon Stream, on both the Daegok-ri and Cheonjeon-ri rock panels. Although the creation techniques and geological environment are comparable to those of Chinese, Russian, or Japanese sites, the iconographic repertoire of the petroglyphs of the nominated property is remarkable and specific to the Korean Peninsula. The cetacean and fishing motifs depicted in the Daegok-ri petroglyphs are not found in China or Japan, and only to a comparable extent in Siberia (the Petgymel site in Russia) and the Karelia region of north-western Russia. The concentration of geometric petroglyphs found on the Cheonjeon-ri panel is not found in any country bordering the Republic of Korea, with the exception of the Rashaan Khad site in north-east Mongolia.

The Petroglyphs along the Bangucheon Stream offer a representation of Asian coastal cultures and provide exceptional evidence of the artistic and cultural evolution of societies on the Korean Peninsula over several millennia.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (i) and (iii).

Criterion (i): represent a masterpiece of human creative genius:

This criterion is justified by the State Party on the grounds that the Petroglyphs along the Bangucheon Stream display a wide range of images executed with great artistic mastery over the course of millennia by the inhabitants of the coastal regions of East Asia. The keen sense of observation shown in the realistic depictions of various motifs and their distinctive compositions demonstrate the exceptional aesthetic sense of these artists. Their creativity is particularly evocative in prehistoric images depicting whales and the main stages of whaling, a subject found only rarely in rock art around the world.

ICOMOS notes that, although the Petroglyphs along the Bangucheon Stream do not demonstrate exceptional artistic technique, their iconographic repertoire is exceptional in terms of the motifs depicted and their concentration. They have also been positioned thoughtfully, taking into account the sunlight at the site and its impact on the visibility of the petroglyphs.

ICOMOS considers the Petroglyphs along the Bangucheon Stream to be a masterpiece of human creative genius.

ICOMOS considers that this criterion is demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the Petroglyphs along the Bangucheon Stream attest to a tradition of rock engraving that was practised for approximately 6,000 years within the landscape formed by the Bangucheon Stream. The various layers of images and inscriptions found on the rock panels of Daegok-ri and Cheonjeon-ri offer an exceptional testimony to this millennia-long tradition, which has persisted through several stages of human development, spanning both prehistoric and historical eras. These rock carvings are exceptional because they concisely illustrate the cultural evolution of the coastal inhabitants of the peninsula over this long period.

ICOMOS considers that the nominated property provides unique testimony to a tradition of rock engraving that lasted for 6,000 years.

ICOMOS considers this criterion to be met because the nominated property illustrates a complex form of artistic expression. These are two of the largest and oldest rock art panels in the Republic of Korea and some of the largest rock art panels in north-east Asia. The subject matter of the carvings is significant, and the various cetacean species are clearly recognisable, with at least one example clearly showing a whale impaled by a harpoon. They illustrate the cultural evolution of the coastal inhabitants of the Korean Peninsula.

ICOMOS considers that the nominated property meets criteria (i) and (iii).

Integrity and authenticity

Integrity

The nominated property includes all of the attributes that give it its Outstanding Universal Value. As the nominated property and its buffer zone have been placed under government protection under the Cultural Heritage Protection Act, it is unlikely that the nominated property will be exposed to negative effects due to neglect or development.

A dam constructed outside the southern boundary of the nominated property area has, in the past, created significant environmental pressures on one part of the petroglyphs of the nominated property, but its negative impact is largely mitigated at present and is unlikely to affect efforts to maintain the integrity of the nominated property in the future.

ICOMOS considers that the integrity of the nominated property has been demonstrated despite a certain degree of vulnerability.

Authenticity

The nominated property retains a high level of authenticity in its form and design, materials and substance, location and setting. The geology of the nominated property and its surroundings has undergone a degree of change compared with its paleo-environment, but this occurred well before the rock carving tradition began. The dam outside the buffer zone caused a certain degree of topographical transformation, but this has been restored. Overall, the attributes expressing the proposed Outstanding Universal Value of the nominated property have been kept virtually intact until today.

ICOMOS believes that, although the dating of the petroglyphs is based on aesthetic and stylistic considerations, given that direct dating of the rock carvings is so far not possible, the dating proposed by the State Party is not called into question, and may even prove to be relatively conservative.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met, despite some vulnerabilities.

Boundaries

There are currently no people living within the boundaries of the nominated property, and only nine residents in the buffer zone

The area of the nominated property has been demarcated along the rocky cliffs that flank the Bangucheon Stream. The area of the nominated property mainly corresponds to the heritage zone of a Scenic Site, a protected area under the Cultural Heritage Protection Act.

The buffer zone was designated based on the closest ring of mountain ridges. The integrity of the landscape setting has been taken into account, as well as the distant and near views from the nominated property.

The buffer zone corresponds to Zone 1 of the Historical and Cultural Environmental Conservation Zone, an additional protection zone created around a State-designated heritage site under the Cultural Heritage Protection Act.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies consideration of the nominated property for inscription on the World Heritage List. ICOMOS also considers that criteria (i) and (iii) have been demonstrated.

ICOMOS further considers that the conditions of integrity and authenticity have been met, despite the vulnerabilities of the nominated property due to the repeated immersion and drying out of the petroglyphs.

4 Conservation measures and monitoring

Documentation

The two rock art panels were discovered in 1970 and 1971, respectively, and since then have been the subject of an in-depth inventory. Both panels have been fully traced and digitized in three dimensions. A very large collection of photographs has been built up over the last 50 years. Copies of all records are maintained both locally and nationally. The Ulsan Petroglyph Museum is compiling a comprehensive archive of all previous records.

At Daegok-ri, a fixed camera takes photographs of the panel at the same time every day, to detect any changes or movements in the rock surface. Research is currently under way, with the support of the local government and the Korean National University of Cultural Heritage, to develop an artificial intelligence-based surveillance system. This system will analyse a series of selected indicators at the sites using data from the fixed camera and other recordings.

The National Research Institute of Cultural Heritage and Ulsan Metropolitan City have photographic and audiovisual inventories.

Conservation measures

Conservation projects for the nominated property are carried out by specialist institutes and nationally certified professionals with a view to preserving its integrity and authenticity. Budgets for the conservation and management of the nominated property are provided by central government and local authorities. The local government is working to permanently remove environmental pressures from a part of the nominated property. To this end, it has consulted local residents and, having identified changes in local opinion, established cooperative partnerships with the relevant competent authorities with a view to establishing an optimal environment for the conservation of the nominated property.

The nominated property has also been governed since 2016 by a conservation plan developed by the local government, also known as the Comprehensive Maintenance Plan for the Bangucheon Petroglyphs (2016). In 2020, it was supplemented by a Master Plan for the Conservation and Management of the Bangucheon Petroglyphs as a World Heritage Site. During the nomination process, two other management and conservation plans for the petroglyphs were introduced in 2020 and 2023 to supplement and update those already in effect, in order to form the management plan included in the nomination dossier.

ICOMOS had requested additional information on these various conservation and management plans for the

nominated property. In November 2024, the State Party provided a summary of the various management and conservation plans for the petroglyphs, and the timeline for their implementation.

Regarding flood management, ICOMOS requested information from the State Party on ongoing consultations with local governments regarding the Sayeon Dam redevelopment project. ICOMOS also wanted to know the date of publication of the official decision authorizing these works, as well as the commencement date of the works

In the additional information provided by the State Party in November 2024, it was clarified that the Ulsan city government was in discussions with the central government about securing alternative water sources and preventing any shortages related to the modification of the dam. This initiative is part of a national project approved in 2022, which aims to redistribute water resources in the Nakdonggang River region. Consultations between local governments are under way to determine the terms of this redistribution, with a strong commitment from central government.

The State Party also advised that, according to the revised schedule, the design phase of the works should begin in November 2024. Once the plans are finalized, work to add gates to the Sayeon Dam spillway is expected to begin in late 2026 and be completed in 2029.

Monitoring

The government operates a monitoring system to protect the nominated property from the effects of potential natural disasters and other threats.

The two rock panels of Daegok-ri and Cheonjeon-ri are inspected annually by conservators from the National Institute of Cultural Heritage, which regularly publishes reports on the state of conservation of the nominated property. Their recommendations are then assessed by specialists from the Cultural Heritage Committee, and are then either implemented by the Conservation Science Center of the National Institute of Cultural Heritage, or delegated to contractors by the local government. The conservation measures implemented over the past 20 years have all been relatively minor, and in line with international conservation standards.

In its interim report, ICOMOS requested additional information on how the drying out phenomenon that will affect the rock art panel after the construction of the dam will be monitored. The State Party responded in February 2025 that changes in colour, biological alterations, exfoliation and erosion of the nominated property are continuously monitored by central and local governments. Furthermore, experts dispatched by central government regularly review the state of conservation of the nominated property, particularly through analyses and 3D scans. Automated monitoring devices have been installed on site to observe the rock panels.

The State Party indicates that, as well as the monitoring indicators relating to the assessment of the conservation of the nominated property, a series of monitoring indicators have been implemented to assess its overall management. The general monitoring indicators concern the accessibility of the nominated property, tourism and its promotion, facilities for visitor comfort, statistical monitoring, equipment relating to the management of the site and training linked to the management and conservation of the nominated property. In the event of inscription on the World Heritage List, the State Party specifies that the existing and future results of monitoring of the nominated property would be grouped together within the future Bangucheon Petroglyphs World Heritage Center.

ICOMOS considers that the major concern regarding the conservation of the nominated property, i.e. the annual flooding of the Daegok-ri panel, is being addressed by the State Party. Adequate measures have been taken and are being implemented to ensure the monitoring of the conservation measures. There is a strong conservation team dedicated to the property, which visits it regularly and makes appropriate conservation recommendations, carrying out measures when necessary.

Lastly, ICOMOS considers that it would be advisable for the monitoring system to be adapted to facilitate the inclusion of its results in the periodic reporting questionnaire.

5 Protection and management

Legal protection

The nominated property is protected at the national level under the Cultural Heritage Protection Act as a Scenic Site named "The Bangucheon Stream and its Surroundings" (2021). It is important to note that this law takes precedence over other laws when there is a conflict of regulations, particularly regarding mining and development.

The nominated property is also protected at the local level by the Ulsan City Cultural Heritage Protection Ordinance as a heritage zone and Historic and Cultural Environment Protection Area (1997). This protection imposes strict controls on all forms of development in the region.

The boundaries of the nominated property area and buffer zone are recognized by the National Cultural Heritage Administration, Ulsan City and Ulju County under three separate laws and ordinances.

Three other laws ensure good practices in the management of the nominated property: the Act on Protection and Inspection of Buried Cultural Heritage (2011), the Act on Repair of Cultural Heritage (2011), and the Special Act on the Conservation, Management and Utilization of World Heritage (2020).

Other legislation protects the broader environment surrounding the nominated property, including, at the national level, the Water Supply and Waterworks Installation Act (2007), as well as the Forest Protection Act (1997), which protect both the watershed and forested areas along the Bangucheon Stream.

The National Land Planning and Utilization Act (2002) controls any proposed changes to land use in the region. The Mountainous Districts Management Act (1997) provides an additional level of protection to the entire area in which the nominated property is located. The Framework Act on Management of Disasters and Safety (2004), as well as the Framework Act on Firefighting Services (2004), establish the framework for emergency responses in the area. The Ulsan City Urban Planning Ordinance (2010) and the Ulsan City Landscape Ordinance (2008) provide additional levels of protection with regard to conservation.

ICOMOS believes that there is an exemplary level of legal protection at national and local levels afforded to the nominated property, as well as the wider landscape in which it is located. The proposed boundaries for the central area and the buffer zone are already officially published in official acts at all levels of government. The administrative, financial and management responsibilities of each level of government are clearly specified in existing legislation. All levels of government cooperate effectively with each other and have demonstrated a strong commitment to the promotion and long-term conservation of the nominated property.

Management system

A dedicated organisation for the inscription on the World Heritage List of the nominated property (known as the Bangucheon Petroglyphs World Heritage Nomination Team) was established within Ulsan City government in 2021. The Nomination Team serves as a coordinator for the implementation of the management system, distributing responsibilities and facilitating communication between the various management entities. This specialised team consists of two sub-units - the World Heritage Policy Unit and the Ulsan Petroglyph Museum which are respectively responsible for the preparation of master plans for the inscription and the implementation of conservation programmes and community involvement, as well as the drafting of the nomination dossier and the implementation of research, exhibition and education programmes.

The petroglyph Nomination Team is working to establish a Bangucheon Petroglyphs World Heritage Center (provisional name), which aims to provide a single entity integrating legal and administrative functions currently carried out by central or local government and, ultimately, to create synergy in the monitoring of potential threats, responding to risks, and implementing conservation projects.

This Centre, which will be located near the nominated property, will serve as a control centre for its conservation and management and will be responsible for tasks such

as monitoring the nominated property based on general and special monitoring indicators, implementing conservation projects, coordinating visit programmes and visit requests, carrying out research projects and implementing education, presentation and awareness programmes. The Centre will also play an essential role in implementing conservation measures required by the new Special Act on Conservation, Management and Utilisation of World Heritage.

Questions relating to the creation of this Centre are currently the subject of discussions, particularly with regard to its organisation, the distribution of roles, its location and its activities.

In close consultation with central government, the Ulju County government prepared an initial management plan for the Petroglyphs along the Bangucheon Stream (known as the Comprehensive Maintenance Plan for the Bangucheon Petroglyphs) in 2016. The Ulsan City government complemented this plan in 2020 by creating the Master Plan for the Conservation and Management of the Bangucheon Petroglyphs as a World Heritage Site, as an integrated management plan for the nominated property. The Ulsan City government updated the integrated management plan, taking into account changes in the social environment surrounding the nomination by drafting supporting documents such as the Comprehensive Plan for Petroglyph Conservation, Management, and Utilization (2020) and the Study on the Establishment of a Comprehensive Plan for Petroglyph Conservation and Management (2023).

ICOMOS requested from the State Party the Master Plan for the Conservation and Management of the Bangucheon Petroglyphs as a World Heritage Site (2020). The State Party sent the requested document on 8 November 2024.

Visitor management

To enhance the visitor experience, the Ulsan City Government operates two museums (the Ulsan Petroglyph Museum and the Ulsan Daegok Museum), as well as heritage interpretation services and a dedicated web page. Pedestrian pathways have been created throughout the site. Specific visitor services have been proposed, such as tours allowing close viewing with prior authorisation, and virtual reality tours.

There is also a website providing information on the nominated property. Five heritage interpreters are on duty each day at the two heritage interpretation centres (three at the Daegok-ri site and two at the Cheonjeon-ri site) to provide cultural and historical information about the nominated property to visitors. Interpretation services are available on site on request.

ICOMOS notes that there are instruments and tools in place to help visitors understand and experience the rock art through various infrastructures. ICOMOS requested the State Party to provide more information on how these measures improve the visitor experience and how this

aspect will be taken into account and potentially improved (perhaps through additional tools) in the future.

Community involvement

Residents have been involved in the implementation of various educational programmes designed to increase the visibility of the nominated property.

ICOMOS considers that there are no concrete and measurable indicators on how the local community will be directly involved in management, respecting the principle of equitable governance of the nominated property.

ICOMOS emphasises that local communities are not included in the site management plan.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers the system of protection and management of the nominated property to be satisfactory. ICOMOS commends the State Party's wish to create a Bangucheon Petroglyphs World Heritage Center, which will serve as a control centre for the conservation and management of the nominated property.

The State Party is nevertheless encouraged to formally involve local communities in the management of the nominated property.

6 Conclusion

The Petroglyphs along the Bangucheon Stream represent an exceptional collection of rock carvings, distributed between the rock panels of Daegok-ri and Cheonjeon-ri, that were created during a period spanning from 5,000 BCE to the ninth century CE. They demonstrate a particularly rich iconographic repertoire, in terms of both the diversity and density of the motifs depicted.

ICOMOS considers that the proposed Outstanding Universal Value has been demonstrated according to criteria (i) and (iii). The conditions of integrity and authenticity of the nominated property have been met.

ICOMOS notes that the major concern regarding the conservation of the nominated property, namely the annual flooding of the Daegok-ri panel, has been duly addressed by the State Party and that adequate measures have been taken and are being implemented to monitor conservation measures.

The nominated property benefits from strong legal protection at both the national and local levels, supported by exemplary cooperation between the various levels of government. The management system for the nominated property is also satisfactory and is effectively coordinated by the Bangucheon Petroglyphs World Heritage Nomination Team. ICOMOS stresses that it will nevertheless be important to ensure the formal involvement of local communities in the management of

the nominated property and the coming into operation of the Bangucheon Petroglyphs World Heritage Center.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Petroglyphs along the Bangucheon Stream, Republic of Korea, be inscribed on the World Heritage List on the basis of **criteria (i) and (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The property is located along the Bangucheon Stream on the south-eastern coast of the Korean Peninsula. It extends for approximately three kilometres along this meandering waterway, in a landscape of stratified cliffs. Within this specific setting, there are two rock panels with remarkable concentrations of petroglyphs namely, the Daegok-ri Petroglyphs and the Cheonjeon-ri Petroglyphs. The petroglyphs depict a wide range of images engraved by successive generations of local artists, using stone and metal tools, spanning a period from the prehistoric to the historic eras, from 5,000 BCE to the 9th century CE.

The animals, human figures, hunting scenes, concentric circles, diamonds and writing carved into the rock show great realism and dynamism, while displaying a specific composition of figurative images and epigraphs. In particular, the petroglyphs representing animals, both aquatic and land-based, present a level of detail that makes it possible to discern the precise species of each animal.

These various images and inscriptions are an exceptional demonstration of this long tradition of rock engraving, extending from the Neolithic period through the Bronze Age and up to the Silla period.

Criterion (i): The Petroglyphs along the Bangucheon Stream display a wide range of images executed with great artistic mastery over the course of millennia by the coastal inhabitants of East Asia. The acute sense of observation reflected in the realistic depictions of various motifs and their specific compositions demonstrate the exceptional aesthetic sense of these artists. Their creativity is particularly evocative in prehistoric images depicting whales and certain stages of whaling, a subject only rarely represented in rock art around the world.

Criterion (iii): The Petroglyphs along the Bangucheon Stream attest to a tradition of rock carving that was practised for approximately 6,000 years within the landscape formed by the Bangucheon Stream. These rock carvings are exceptional because they demonstrate a complex form of artistic expression and concisely illustrate the cultural evolution of the coastal inhabitants of the peninsula over this long period.

Integrity

The property includes all of the attributes that convey its Outstanding Universal Value. A dam constructed outside the southern boundary of the buffer zone has, in the past, created significant environmental pressures on one part of the petroglyphs of the property, but its negative impact has now been largely mitigated.

Authenticity

The property retains a high level of authenticity in its form and design, its materials and substance, location and setting. The dam outside the buffer zone caused some degree of topographical transformation, but this has been restored. Overall, the attributes expressing the Outstanding Universal Value of the property have been kept virtually intact until today.

Protection and management requirements

The property is protected under the Cultural Heritage Protection Act and other relevant laws, such as the Water Supply and Waterworks Installation Act and the Forest Protection Act. The property and its buffer zone are designated nationally as protected areas (under the category of Scenic Site). The two rock panels that have a high concentration of petroglyphs are also listed as National Treasures. Conservation and restoration projects for the property are carried out by specialist institutes and nationally certified professionals in order to preserve its integrity and authenticity.

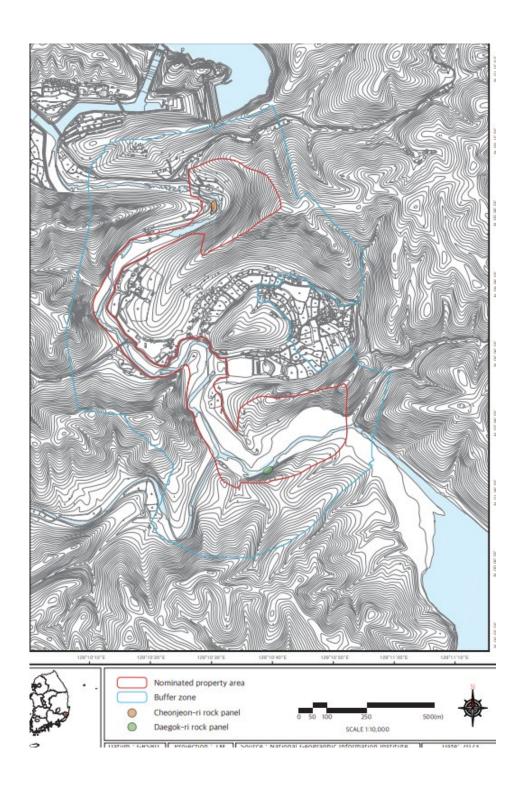
The local government has established a dedicated property management body that is responsible for drawing up an integrated management plan, coordinating inputs from various stakeholders, and performing other tasks related to the management of the property. The local government is working to control the environmental pressures on one part of the property, particularly with regard to the potential drying out of the Daegok-ri panel due to the redevelopment of the Sayeon Dam. The central and local governments continuously monitor a number of physical and biological parameters to ensure that the state of conservation of the property is maintained.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Informing the World Heritage Centre of the progress of the Sayeon Dam works,
- b) Ensuring the effective operationalisation of the Bangucheon Petroglyphs World Heritage Center,
- c) Formalising the role of local communities and residents in the management system,
- d) Informing the World Heritage Centre of the intention to undertake or authorise all major projects which may affect the Outstanding Universal Value of the property, in line with

paragraph 172 of the *Operational Guidelines for* the *Implementation of the World Heritage* Convention.



Map showing the boundaries of the nominated property

Ancient Khuttal (Tajikistan) No 1627

1 Basic information

Official name as proposed by the State Party

Ancient Khuttal

Location

Vakhsh district
Vose district
Dangara district
Jaloliddini Balkhi district
Farkhor District
Khovaling District
Khatlon region
Republic of Tajikistan

Brief description

Ancient Khuttal was a medieval kingdom located in a distinctive geographic unit bounded by the Panj River, Vakhsh River and the ridges of the Pamir piedmonts. The nominated property consists of a series of ten sites and one monument associated with the medieval kingdom that had exchanges with surrounding powerful empires and remained independent or semi-independent from the 7th to the 16th centuries. Located at a key crossroad of the Silk Roads connecting ancient China in the northeast to Central Asia, the kingdom was an active player in the networks of trade and contributed high-value commodities such as salt, gold, silver, and local breeds of horses. The movement of people and goods in the region was accompanied by interchanges in systems of beliefs, knowledge, and technology which are represented in the diversity of the sites of the region, including Buddhist temples, capital city and palace sites, manufacturing centres, settlements, and caravanserais.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of ten *sites* and one *monument*.

Included in the Tentative List

12 July 2023

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 8 to 18 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about description, authenticity, boundaries, integrity, conservation measures, safety and security of the component parts, disaster risk management, legal protection, and monitoring.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the Ancient Khuttal, links between the component parts, Silk Roads context, authenticity, management, interpretation and presentation, capacity building, and involvement of local communities.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

Located in the central and east part of the Khatlon region and bounded by the Panj River to the south, the Vakhsh River to the northwest, and the ridges of the Pamir piedmonts to the east, with a territory of ragged mountains in the northeast and vast loess plain in the southwest, the nominated property was the north-eastern part of the ancient state of Bactria or Tokharistan. Located at the intersection of the Silk Road network linking Bactria with the east and north, the medieval kingdom maintained its independent or semi-independent state, and at the same time, served as a transition of goods between China, India, and the west, and actively participated in international trades with its own famous commodities such as Khuttal horses, gold, silver, and salt.

According to the nomination dossier, the historic development of the Khatlon has been divided into nine stages.

Stages 1 to 5

The region was inhabited as early as 1 million -800,000 BP and became the melting pot and crossroads of many civilisations and empires.

Stage 6: Khuttal under the Turkic Khaganate. The Arab Conquest

In the 580s CE, the Hephthalites were defeated by the combined forces of the Sasanians and the Turkic Khaganate. After the disintegration of the Hephthalites, the region was called Khuttal, and it became an independent kingdom. It was annexed in 625 CE by the Western Turk Empire. Under the Turkic rule, significant development of the culture of the region was achieved in the 7th-8th centuries, new cities were built, Buddhism flourished with the construction of Buddhist Monasteries, and the 100-kilometre Kafir Canal was constructed. Buddhism, ancient Turkic beliefs, and Zoroastrianism were the main religions. From the end of the 7th century, Arabs began to conquer Central Asia, and by the mid-8th century, the region had become part of the Arab Caliphate.

Stage 7: Khuttal in the early Middle Ages

At the end of the 8th until the 10th century CE, Khuttal was ruled by a branch of the Banijurid dynasty, also known as Abu Daudis. At the beginning of the 9th century, Khuttal was ruled by Hashim ibn Majur or Banijur. In the late 10th century, Khuttal, along with some areas south of the Amudarya River, recognised the power of the Samanids. By the 9th-10th century, Vakhsh was part of Khuttal. The Mongol conquest of Central Asia undermined the economy and the settlements of the region, and the Vakhsh Valley was abandoned until the 20th century.

Stage 8: Khuttal in the late Middle Ages

Khuttal was initially ruled by a local dynasty that was later replaced by relatives of Timur. Under the rule of the Mongolian family of Chagatai, a revival of the region began. The process was accelerated under the Timurids at the end of the 14th-15th centuries. In 1422, the uprising of Khoja Iskhaq and Nurbakhsh occurred in the mountainous part of Khuttal. In 1504, Khuttal and its surrounding areas came under the rule of the Uzbek Sheibanids. In the 16th century, the region was renamed Kulab. In 1870, Kulyab, a subregion of the Khatlon region, became part of the Eastern Bukhara when the Bukhara Emirate itself became a protectorate of the Russian Empire.

Stage 9: Khatlon Region in the Late 19th-20th centuries

After the revolution, the overthrow of the Emirate, and the proclamation of the Bukhara People's Republic in 1920 as part of the Autonomous Tajik Soviet Republic and then the Tajik SSR, the region was actively developing. The region has become the main producer of cotton in Tajikistan. Although the civil war in Tajikistan badly affected the region, recovery and development took place with the active investment by the state in the infrastructure, industry, and culture

The nominated property comprises eleven component parts to reflect the multifaceted cultural traditions of Ancient Khuttal. They are categorised as religious sites, capital cities, settlements, and infrastructure. The original area of the eleven component parts as proposed in the nomination dossier and before changes made to the boundaries totalled 145.628 ha, with buffer zones totalling 415.6569 ha. The revised area of the eleven component parts totals 152.409 ha, with buffer zones totalling 408.8769 ha.

Component part 1: Ajinatepa Buddhist monastery

Constructed on a plan of two mandalas, the layout of the monastery has a rectangular shape of 100×50 metres and is divided into two parts, the temple and the living quarter. The temple occupies the northwest part of the ensemble, with a tall stupa at the centre of a mandala. Small-scale stupas can be found in the corners and rooms of the temple. Special niches with sculptures were found in the walls of the corridors linking various rooms. There was a giant sculpture of Buddha in Nirvana (12.85 metres long and 1.82 metre high) in the room in the east corner of the temple facing the stupa. It has been relocated and restored and is now displayed at the National Museum of Antiquities in Dushanbe.

The living quarter resembles the layout of the temple on a smaller scale. One of the rooms was a square sanctuary, richly decorated by wall paintings and clay sculptural compositions placed on wall pedestals. A large-sized community meeting room is located in the western part.

The main load-bearing walls were constructed of blocks of *pakhsa*, a building material made of broken clay. Raw bricks were used mainly for constructing arched vaults, domes, and niches, while burnt bricks were used for lining the path in the living quarter.

Over 600 artefacts have been discovered at this site, including over 400 silver and copper coins issued in Northern Tokharistan and sculptures of Buddhas, bodhisattvas, deities, demonic beings, devatas, monks, animals, birds, and friezes with ornamental motifs. The sculptures were made of clay and show paint residues.

The date of initial construction is unknown. Written sources indicate that in the 7th and 8th century Buddhism prevailed in Tokharistan, and the Ajinatepa Buddhist monastery was a part of this religious landscape. In the mid-8th century, the monastery ceased to exist, probably as a result of the Arab invasion of the Vakhsh Valley. After an initial examination in 1959, the site was systematically excavated from 1961 to 1975, including the discovery of the sculpture of Buddha in Nirvana and fifty-two rooms. In 2018, further excavations were conducted in the central part of the large stupa.

Component part 2a: Kalai Hulbuk

This component part comprises the remains of a palace complex of Hulbuk, the capital city of Khuttal, and its adjacent areas with the remains of a bathhouse. The palace complex was surrounded by a triple line of

fortification walls, but only the innermost one survives. The walls were made of *pakhsa* and covered with burnt bricks. The rectangular pylons with an interval of sixteen metres were built in the eastern and northern sides of the western wall, while two conical semi-columns on a stepped plinth were built in the southern side of the wall with an interval of ten metres. The corners of the fortification wall have four round towers. A minaret is located in the northern wall.

The entrance to the palace complex is in the middle of the western fortification wall, with a wooden gate framed by rectangular pylons. The entrance structure represents a U-shaped portal, decorated with brickwork with a geometric pattern and a Kufic inscription. Currently, the original portal is exposed and well-conserved in the Hulbuk Museum. Behind the entrance portal, there are kitchens on the right and barracks and a guardians' room on the left.

The centre of the fortified area is the palace complex, which is divided into three equal parts, the northern and southern parts, and the central courtyard between them. The covered brick sewage channel and kuburs (ceramic water pipes) of the heating system lie under the floor of the entire palace complex. The southern part of the palace complex was an administrative centre with two construction horizons of different layouts. The buildings of the lower construction horizon were destroyed by fire in the early 11th century, and they were subsequently filled with five metres of clay that formed a solid platform for constructing the buildings of the upper construction horizon. Initially, the north-western part of the upper horizon contained a large aivan (a space closed only by three walls opening towards the courtyard), which was later rebuilt into a mosque. The northern part was a residential area with living rooms and a courtyard. The central courtyard was surrounded by two aivans, and the ceilings were supported by twenty-two wooden columns along the perimeter of the courtyard. The latter contains a large reservoir well for drainage or water storage.

The buildings were constructed using *pakhsa*, adobe bricks, and burnt bricks laid with mud mortar. Bricks in various shapes and alabaster were used for decorating the buildings. Some walls were covered with paintings. The main decoration of the palace complex was carved ganch in geometric patterns. Ceramic and glassware were found at the site.

In the buffer zone, there are remains of a bathhouse twenty metres from the north-eastern tower of the Kalai Hulbuk and remains of a mausoleum that was converted from a caravanserai.

Archaeological excavations indicate that the Kalai Hulbuk settlement dates to the 10th century and lasted until the 12th century. In 1064, Kalai Hulbuk was destroyed after the campaign of the Seljukid Alp-Asrlan. In 1952-1953, the location of Hulbuk, the historical capital of Khuttal, was determined. In 1957, 1959–1991, 2003, 2005, and 2006, the site was studied intensively.

Component part 2b: Shahristoni Hulbuk

Shahristoni Hulbuk contains the remains of the residential area (shakhristan) and workshops of Hulbuk. Hundreds of households, engineering, handicrafts, weapons, and decorative items were found here. A water supply system was found consisting of a well and a network of kuburs. The residential buildings are typically constructed surrounding a courtyard to form a household estate. Handicraft industries occupied the eastern and north-eastern parts of the archaeological site, as evidenced by the production waste (pottery and glass slag, defective products), the remains of two furnaces and necessary supplies (kalybs, pins, iron billet castings), traces of metal processing workshops, ovalshaped ceramic furnaces, and garbage pits containing forty-nine defective and twenty-two fragments of specific vessels and spheroconuses. The remains of the furnaces in the form of two furnace chambers were found 200 metres north of Kalai Hulbuk. Fragments of ceramic jugs, bowls, plates, and pots; a kalyb matrix for the production of stamped jugs; a ceramic pencil case; kuburs; a metal sword handle and a knife fragment; bronze and glass bracelets; ceramic and stone beads; fragments of stone cauldrons; and a stone with an inscription have also been found at the site. A bronze incense burner in the form of a standing cheetah was found, testifying to the high level of artistic achievement. The walls of the buildings were made of gypsum finished with white and coloured plaster, while burnt brick was used only for flooring.

Historic sources describe the 10th-century Shahristan of Hulbuk. Archaeological excavation campaigns were conducted in the 1950s, 2004, and 2017–2020.

Component part 3: Manzaratepa

Constituted by a citadel and a *shakhristan*, Manzaratepa is the second largest city in the immediate vicinity of Hulbuk, providing the capital with agricultural products and receiving caravans on the trade route from Balkh to China.

The citadel occupies the northwestern corner of the hill with a rectangular layout. Towers were erected at the corners of the citadel, and a moat separated it from the *shakhristan*. A north-south main street separated the *shakhristan* into two parts.

The *shakhristan* contains the remains of buildings made of *pakhsa*. A well-preserved bathhouse was found, consisting of five enfilade rooms built of mud brick and lined with burnt bricks on alabaster solution of three different sizes. The round furnace was connected by three channels to the underground hypocausts which heated two hot rooms. The floor of the hot rooms is supported by brick pillars, and heat and smoke came out through vertical channels in their walls. A third room adjoined these two rooms from the entrance side; together, all three rooms formed an enfilade with side aisles. The side passage was located on the west side of these rooms. A room in front of the furnace, not connected to other bathhouse rooms, was equipped with two tanks (baths of different sizes) and wall shelves. Thirty-two glass bottles for storing perfumes were found in this room.

Numerous artefacts related to the handicraft production of ceramics were discovered at Manzaratepa.

Archaeological study and excavation were carried out at this site in 1959, 1981, 2006, and 2011-2013.

Component part 4: Zoli Zard

Zoli Zard was the largest multi-layered settlement that controlled the entrance to the Dangara Valley and was the centre of an oasis of numerous small settlements for several centuries. Zoli Zard comprises the remains of a fortress with a citadel.

The fortress has a rectangular layout. Most fortress walls have survived except for the southern part of the eastern section. Twenty-four towers rise above the wall at irregular intervals from thirty-five to ninety metres. The entrance to the fortress is a gate in the south-western corner, fortified by towers at both sides. Within the fortress, there are two large blocks of residential buildings and an inner courtyard with a spring, providing the fortress with sufficient water.

The citadel, located in the north-eastern corner of the fortress, had two levels. The upper level had a square layout and occupied the intersection of two external walls. At the bottom, along the eastern wall, a rectangular room was found.

The artefacts discovered at Zoli Zard include fragments of ceramic vessels, while architectural elements, ceramic figurines, stone objects, and coins are rarely found.

Historical sources suggest that in the 3rd century BCE, Zoli Zard appeared as the administrative and political centre of the Dangara Valley, in which a group of settlements, including Oxu, Malika, Buleni Poen, Parmkamchi, Gidzhovak, and Pushing, existed. It ceased to function after the Mongol invasion but survived until the end of the 19th century. In 1942, the site was inspected for the first time. In 2003-2006, an assessment of the archaeological site was initiated and was continued in 2016-2017. Since 2019, systematic excavations have been carried out by the French-Tajik expedition.

Component part 5: Makbarai Mavlono Tojiddin

Erected on the oval-shaped lands of the citadel of a Kushan settlement, the mausoleum is an example of the Muslim vernacular architecture of the Khuttal kingdom of the late Middle Ages.

The mausoleum consists of a square room, a *gurkhona* (a room with a burial) and a crypt. There are three *saganas* (a closed structure erected over a burial) in the centre of the *gurkhona* on a small hill. The central *sagana* belongs to Mavlono Tojiddin himself, the western one belongs to his wife, and the eastern one belongs to his daughter. The square-shaped crypt is in the underground part of the mausoleum, with the walls built of seven rows of brickwork, on which the Balkhi yault was laid

Fragments of ceramics, Timurid copper coins, and a stone base in the form of a post-Mongol hexagonal pillar on a quadrangular pedestal were discovered.

The monument was first examined in 1942. In 2009, the building, the cemetery, and the surrounding area were investigated for the compilation of the archaeological map of Tajikistan.

Component part 6: Halevard (Kofirkala)

Associated with and later subordinated to Khuttal, Halevard (Kofirkala) consists of the remains of the capital of the Vakhsh region, which ceased to exist at the Arab conquest of the Vakhsh Valley. Square in plan and orientated to the cardinal directions, the settlement is constituted by a citadel, a *shakhristan*, and a *rabad* (suburbs). It was divided by a central road into two parts and protected by fortification walls reinforced with fifteen towers built of gypsum blocks.

The citadel, located in the northeastern corner of the settlement and separated from the *shakhristan* by a deep moat and a square, was protected by two parallel fortification walls and reinforced by three towers. A Buddhist sanctuary, which functioned in the 6th and 7th centuries, was found with a hall surrounded by a four-column corridor with a lobby.

In the *shakhristan*, there was a large reservoir, close to which a complex of premises was located, consisting of a large ceremonial hall and a series of economic premises. About forty *hums* (large vessels for storing food stocks) were found in a room, suggesting that this room was used for storing agricultural products and could hold about four tonnes of products.

Raw and burnt bricks, *pakhsa* blocks, and tiles were used for constructing the houses at both the *shakhristan* and the citadel. Raw bricks were mainly used for the construction of arched vaults and domes. The walls were decorated with ganch plaster.

Numerous fragments of wall paintings and extremely valuable remains of the manuscript on birch bark written in Brahmi script were found, indicating the direct link with the Ajinatepa Buddhist monastery. In the *shakhristan*, a ceramic tile with a relief image of the scene of the offering of gifts, a 6th-7th century carnelian seal gem with the image of a horseman on a horse, animals, and a bird of prey, a Hephthalite coin and coins of local minting with the Bactrian-Hephthalite legends, and many ceramics, Tokharistan and Kushan coins, local and imported glass vessels, metal, and jewellery artefacts were discovered.

Information about the medieval Vakhsh Valley and adjacent territories is contained in various written sources, which suggest that Halevard probably possessed a cosmopolitan Tokharian identity, absorbing the traditions of both Buddhism and the Iranian world. Buddhism was practiced in the Vakhsh Valley, as in the entire medieval Khuttal. Information about the confession of the Hinayana doctrine in Khuttal is found in Chinese written sources. The

presence of the Buddhist sanctuary of the 6th century in the citadel of Halevard confirms the information from these sources. The site was first inspected in 1947. Archaeological excavation campaigns were conducted in 1956-1957, 1968-1969, 1970, 1973-1991, 2004, 2007 and 2008.

Component part 7: Shahristoni Zoli Zar

The settlement flourished during the Greco-Bactrian period, the Kushan period, and the early and late Middle Ages, reflecting political and cultural changes in Northern Bactria-Tokharistan for several centuries. The archaeological site comprises a citadel in the eastern part of the hill, a *shakhristan* in the middle, and a *rabad* on the west.

Separated by a moat from the *shakhristan*, the citadel has a rectangular layout with five towers and a double row of fortification walls along the southern and western sides. There was a moat between the walls. Three complexes were found in the citadel. The first comprises four rooms; one was residential, two constituted a blacksmith workshop, and one was a corridor. The second complex is a large room containing many *hums* dug into the neck level and arranged in a certain order. All *hums* were covered with ganch lids of a round shape. The third complex contains one room where eight cylindrical hearths made of baked clay were found.

The southern edge of the *shakhristan* is partially affected by the construction of a road. During the construction of the road, one building built of burnt brick was discovered. Many bricks had green and purple watering, typical for the 15th-17th centuries. The lower layers of the *shakhristan* date to the 4th-6th centuries.

The *rabad* is located west of the *shakhristan* with one tower preserved. The artefacts discovered at the Shahristoni Zoli Zar include ceramic, glass, iron, and stone finds, as well as Kushan and Sasanian coins.

The discovered cultural layers of Shahristoni Zoli Zar belong to the 2nd-3rd, 5th-8th, 9th-12th and 15th-17th centuries. Thus, the city appeared in the Kushan period. The city was destroyed during the Arab invasion in the 8th century and briefly recovered in the Middle Ages. It reached its peak in the early Middle Ages when it became the centre of the Farkhor Valley and a major city on the regional branch of the Silk Roads. However, the subsequent gradual invasion of the Karakhanids and Seljuks led to its desolation. A small section of the *shakhristan* was still inhabited for a short time in the post-Mongol period. The site was surveyed in 1954 and re-examined in 1955. Archaeological excavations were conducted in 1965 and 2008–2009. In 2015, 2017, 2018, the site was surveyed again.

Component part 8: Tohir Caravansarai

Located between the crossing of the Panj River and the Surkhob Valley, Tohir Caravanserai witnessed the development of trade in Khuttal along the regional branch of the Silk Roads during the 11th-12th century.

The caravanserai included two adjacent buildings divided by a wall. The northern building is rectangular with an entrance in the northern wall. The building has two towers in the middle and a third at the corner on the northern wall, while the southern wall has three towers. The inner space was occupied by a courtyard. The southern building has a square shape and four towers, and is accessed through the northern building. In addition, three towers are found outside the southern wall. A row of rectangular rooms along the eastern wall, two square corner rooms along the northern wall, one room along the western wall, two rows of rectangular rooms along the southern wall, and an inner courtyard have been found in the southern building.

Based on the architectural layout, it is considered that the caravanserai was built in two stages with a small gap between them. It was built during the Samanid period and was abandoned in the post-Mongol period due to the termination of the trade route. The caravanserai was discovered in 2015.

Component part 9: Shahrtepa

Shahrtepa contains the remains of the settlement dated to the 7th-8th and 9th-13th centuries. The site has a square shape and is constituted by a citadel and a *shakhristan*.

The settlement was surrounded by a fortification wall with towers at the corners. The front entrance gate is located in the centre of the eastern wall, with a U-shaped platform in front, and is reinforced with towers. Opposite to the entrance is the city square. Remains of some residential buildings and partially destroyed mounds have been found on the eastern side of the *shakhristan*.

The citadel was perched on a hill in the north-western corner of the settlement. Remains of the room floors and plastered walls were found. The filling between the floors consisted of sand interspersed with coals, ash, a small amount of animal bones, and ceramic fragments. A *sufa* was located along one of the walls, filled with brick fragments, stones, and debris. A fragment of a carved panel was found in the front room, indicating the tradition of decorating rich houses with carved ganch. The remains of a man were found under the burnt beams of the ceiling.

The archaeological studies indicate that the city appeared in the 7th-8th centuries and was destroyed during the Arab invasion. During the Samanid period, Shahrtepa was revived and became a large city with a developed handicraft industry in the 9th-13th centuries. The city was destroyed again due to the Mongol invasion in the 13th century. The ruin was examined in 1954 and a visual description was made in 1964. In 2013, Shahrtepa was chosen for the archaeological practice of the students of the Historical Faculty of the Tajik National University, and an annual excavation was conducted in the citadel. The site was surveyed again in 2015, 2017 and 2018.

Component part 10: Khishttepa Buddhist temple

The site is approximately square in plan with buildings constructed using pakhsa blocks and raw bricks. It

comprises over two dozen rooms and can be divided into monastic and religious parts.

The monastery part is on the eastern side of the complex, with the entrance decorated with two pylons. The central hall is a domed cruciform room. *Sufas* were located along the walls of this room. There were three rooms, monastic cells with *sufas* and hearths to the south of the central hall. There was a large room in the northeast corner of the building. *Sufas* were placed along the long walls of the room. This isolated room served as a gathering place for the religious community.

The religious part is located in the western part of the complex. There is a sanctuary with an altar in the centre. The altar was under a canopy supported by four wooden poles. The sanctuary was surrounded on four sides by bypass corridors with picturesque and sculptural decor. A special room with a votive stupa was richly decorated. A cruciform stupa made on a clay base was placed in its central part. Pedestals were found in the room corners, probably made for clay statues. Fragments of stucco decorations and sculptures were also found in the sanctuary.

Over sixty clay miniature models of stupas were found, demonstrating the similarity with those found at Ajinatepa Buddhist Monastery (component part 1) and other famous Buddhist monuments, such as Sarnath, Ghazni, or Gilgit. Over thirty ceramic tablets with inscriptions were found, one with the Buddhist doctrine *dharma paryaya* written in the Brahmi script. Coins were also found, including two silver Arab-Sasanian and two bronze Sogdian coins, four Arab-Sasanian and twelve bronze Sogdian and Tokharistan coins with a Sogdian legend. Other bronze Sogdian coins were also found in various parts of the archaeological site. One of the bronze coins was a Kushan tetradrachm with the image of Vima Kadfiz (112/113-127 CE). The other coin, an Arab-Sasanian one, imitated the drachma of Khosrow II (590-628 CE).

According to Chinese sources, the spread of Buddhist beliefs and practices in Khuttal began in the 7th century. Khishttepa Buddhist temple was constructed in the 7th century and operated until the mid-8th century. Archaeological research revealed that the construction of the complex was carried out over a single period based on a clear plan. Prior to the construction, the area was levelled with bulk soil. The site was discovered in 1985, and excavations continued until 1988 when the site was completely excavated.

State of conservation

All the component parts except Makbarai Mavlono Tojiddin (component part 5) are archaeological sites. These sites are either unexcavated or the excavated parts have been backfilled for protection. Therefore, the overall state of conservation of these sites is stable. ICOMOS requested more information on the backfilling conducted at these sites. In additional information submitted in November 2024, the State Party provided a detailed description of the backfilling at the excavated areas of each component part,

supplemented by a set of maps on which all past archaeological excavation units are clearly marked. The early excavated areas have been simply backfilled, while those after 2000 were covered by a protective geotextile layer before backfilling.

At Ajinatepa Buddhist Monastery (component part 1), the Nirvana Buddha was discovered in 1966 and subsequently relocated to Dushanbe for conservation and presentation. In additional information submitted in November 2024, the State Party provided a detailed description of its restoration process. After in-situ study and documentation, the statue was divided into seventy-two fragments and transported to the Restoration Laboratory of the Institute of History of the Academy of Sciences of the former Tajik SSR in Dushanbe. The interventions were carried out between 1969 and 1978, following internationnaly accepted conservation principles. It was pieced back together in 1978 and 2000, and the Buddha statue was placed in the exposition of the National Museum of Antiquities of the Republic of Tajikistan in Dushanbe in 2001. A UNESCO Japanese Fund-in-Trust project was implemented at the monastery site in 2005-2008, including full-scale three-dimensional documentation of the site, archaeological cleaning, and conservation interventions on the most endangered walls, including the addition of the sacrificial layers. In the same year, the site was fenced and a new bridge was built across the canal to access the site.

At Kalai Hulbuk (component part 2a), the outer walls, main portal, minaret, and towers of the palace were reconstructed in 2006 as part of the celebration of the 2,700th anniversary of the city of Kulyab. The western side outside the archaeological site was landscaped and adapted for visitation in 2021-2023 as part of a World Bank project. In additional information received in November 2024, the State Party confirmed that the reconstructed parts of the fortification walls rest on the base of the original walls. Areas excavated in 2003, 2005, and 2006 have not been backfilled. Instead, shelters have been constructed for protection and presentation purposes as part of a landscaping project funded by the World Bank. The remains of the caravanserai under the southern fortification wall are also protected by a shelter.

At Shahristoni Hulbuk (component part 2b), the two areas excavated in the 2017-2020 campaign were planned to be backfilled by the end of 2024.

At Makbarai Mavlono Tojiddin (component part 5), a major restoration campaign was conducted. Based on the additional information of November 2024, detailed architectural and archaeological research of the monument was conducted in 1987 to design a restoration project of the mausoleum. This indicated that the original walls of the mausoleum, the dome, the portal entrance in the southwestern façade, and the crypt were preserved in their original forms. Based on this research, it was proposed to remove later additions to return it to its original appearance of the 15th century, but the project was postponed. In 2001, the religious community of the village of Korez initiated a restoration project and the mausoleum took its current form.

The original crypt remains intact, some parts of the walls were repointed, and the original dome was covered by a metal coating. The monument was encircled by a new brick enfilade with wooden ceilings.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the overall state of conservation of the nominated property is stable.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are natural disasters such as flooding and earthquakes, development pressure, and natural deterioration.

Flooding affects only the Tohir Caravanserai (component part 08). Located on the left bank of the Toirsu River, the spring floods slowly erode the edge of the site. In additional information provided in November 2024, the State Party confirmed that the State Program for the Protection of Historical and Cultural Heritage for 2026-2031 will include the development of the disaster risk preparedness plan and implementation of the targeted mitigation measures, including the strengthening of the left bank of the Toirsu River to avoid negative impacts from flooding. Earthquakes also constitute threats to architectural features since the nomination property is located in a high seismic activity region.

Development pressures such as housing development in Shahristoni Hulbuk (component part 2b) and Halevard (Kofirkala) (component part 6) are controlled by legislation and land use restrictions. Livestock grazing at Manzaratepa and Zoli Zard (component parts 3 and 4) may damage the archaeological sites. The local authorities have been conducting regular meetings with the communities to cease this practice.

While most component parts are underground archaeological sites with stable conditions, the exposed architectural remains, such as those at Ajinatepa Buddhist Monastery (component part 1), Kalai Hulbuk (component 2a), and Halevard (Kofirkala) (component part 6) are subject to natural deterioration including weathering and vegetation growth, which requires conservation interventions and attentive daily maintenance.

ICOMOS considers that the overall state of conservation is stable and the main factors affecting the nominated property are under control. Conservation interventions and daily maintenance for the exposed architectural structures of Ajinatepa Buddhist Monastery (component part 1), Kalai Hulbuk (component 2a), and Halevard (Kofirkala) (component part 6) should be carried out.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated series represents the heritage of Ancient Khuttal as a region and a medieval kingdom that existed in the piedmont of the Pamir Mountains from the 7th to the 16th centuries, and which reflects the complexity of the political, economic, cultural, and religious aspects of the historical region in the key stages of its emergence and development.
- Ancient Khuttal represents the cultural exchanges and transformations in North-Eastern Bactria and Tokharistan over several centuries.
- Located on a regional section of the Silk Roads, Ancient Khuttal was well integrated into the Central Asian trade networks, and not only acted as a place relaying goods but also offered its unique high-value commodities such as salt, gold, silver and a local breed of horses.

Based on the nomination dossier and according to the State Party, the key attributes of the proposed Outstanding Universal Value are the main elements within the component parts (temples, sanctuary, monasteries, citadels, castles, *shakhristans*, caravansarais, *rabad*, palaces, and bathhouses). The attributes also include evidence of city planning, decorative elements, items extracted from the archaeological sites, settings of the settlements, technologies (such as construction, heating, irrigation, water supply and drainage), and defences.

ICOMOS notes that "Ancient Khuttal" is the name of the region or kingdom, and what has been nominated is a series of sites that express its cultural heritage. Therefore, ICOMOS recommends that the name of the nominated serial property be changed to: "The Cultural Heritage Sites of Ancient Khuttal".

Comparative analysis

The comparative analysis has been developed around the following parameters: interchange of values (criterion (ii)), testimony (criterion (iii)), outstanding example (criterion (iv)), and human interaction with the environment (criterion (v)). It has examined nineteen properties of the States Parties within the same geocultural and chronological frameworks as Ancient Khuttal including seven World Heritage properties and twelve Tentative List sites. These include sections of the Silk Roads, cities, mausoleums and caravanserais from China, Kazakhstan, Kyrgyzstan, Tajikistan, Azerbaijan, Russia, Turkmenistan, Uzbekistan, Afghanistan and Iran.

In relation to the interchange of values, the State Party concludes that Ancient Khuttal belongs to different geocultural and chronological frameworks than the comparators. It represents a unique, complex interchange of human values and mutual influences, covering social and economic values, architecture and urban planning,

religion, culture and art, science, and technology from the 7th century to the 16th century CE. In addition, this analysis illustrates the cultural influences of several subsequent powers on Khuttal culture.

In relation to the testimony to the cultural tradition or civilisation, the State Party concludes that the nominated property is an exceptional testimony to the disappeared cultural tradition of Ancient Khuttal that existed in the piedmonts of the Pamir Mountains from the 7th to the 16th centuries. These cultural layers are evidenced by the remains of buildings, settlements, religious sites, and infrastructure, and numerous artefacts reflecting the emergence and development of this independent and semi-independent region of northeastern Bactria and Tokharistan.

In relation to typology, the analysis proposed by the State Party found that the nominated component parts of Ancient Khuttal represent an outstanding example of fortified settlements typical for northeastern Bactria and Tokharistan and early medieval Buddhist architecture in Central Asia. The characteristic features of the fortified settlements of Ancient Khuttal, preserving the ancient Bactrian and the early medieval Tokharistan patterns, illustrate several stages in the history of Central Asia which are not seen elsewhere. The combination of Gandhara architecture with the construction techniques of Central Asia led to the emergence of the original Khuttal Buddhist tradition in the 7th and early 8th centuries.

In relation to human interaction with the environment, the State Party concludes that Ancient Khuttal is an outstanding example of traditional human settlements and water-use practices in the Pamir piedmonts zone. The capital city and the settlements used early medieval long-distance canals from the Pamirs. These methods are different from other sites on the Silk Roads. For example, many others are located near oases. The State Party argues that the interaction of the people and nature led to the emergence of unique town planning and irrigated agricultural practices.

The final part of the comparative analysis is an internal comparison of 164 sites within the historic territory of Ancient Khuttal to demonstrate the rationale for the selection of the component parts. The selection criteria are the geographic and chronological associations with Ancient Khuttal, reliability of information sources, functional type, relevant values, and authenticity and integrity. Based on this analysis, eleven component parts were selected.

ICOMOS considers that, while the geo-cultural scope and chronological framework for comparison are appropriate, the comparative analysis should have been made on the basis of the proposed Outstanding Universal Value as a whole, rather than comparing the criteria one by one.

To strengthen the comparative analysis, ICOMOS requested the State Party to provide more information about the regional networks in which Ancient Khuttal

operated, and the outstanding contribution made by the nominated series as a whole to the international trade of the Silk Roads. Furthermore, ICOMOS requested more information on how the identity of Ancient Khuttal was shaped by international trade. The State Party responded in February 2025 that Ancient Khuttal was at a key location on the Silk Roads. The route through Khuttal along the Vakhsh River to the Alai Valley and further to Kashgar was well known in ancient times, as demonstrated by Chinese and Muslim texts. Furthermore, the State Party emphasises that Ancient Khuttal was not only a station on the way, but was the easternmost edge of the spread of the Hellenistic civilisation, and its salt, gold, horses and horse equipment were very highly valued and widely sold throughout the East.

Regarding the internal comparison to justify the selection of the component parts, ICOMOS considers that arguments put forward by the State Party regarding the contribution of each component part to the nominated series focus only on individual aspects of Ancient Khuttal. While this is necessary to understand Ancient Khuttal, ICOMOS in its interim report requested the State Party to provide more information on the clearly defined links that relate the different component parts of the serial nominated property, as well as on how each component part contributes to the proposed Outstanding Universal Value of the series as a whole. The State Party responded in February 2025 that the rationale for including such a variety of component parts is to show not only their significance but also the interrelationships without which the development of Khuttal would have been impossible. The State Party stresses that the remains of cities of various sizes and affluence, palaces, stations on caravan routes. Buddhist monasteries, and Muslim religious sites form an inseparable fabric of Ancient Khuttal.

ICOMOS considers that, while the eleven component parts are the most representative sites in the region to reflect the multiple facets of Ancient Khuttal, Shahristoni Zoli Zar (component part 7), Shahrtepa (component part 9), and Khishttepa Buddhist temple (component part 10) contribute less to the proposed Outstanding Universal Value as conveyed by other component parts. They are smaller and less studied than the other component parts, and bear witness to aspects of the serial nominated property that are already represented by the other component parts. ICOMOS therefore considers that these component parts do not contribute to the proposed Outstanding Universal Value of the nominated property as a whole in a "substantial, scientific, readily defined and discernible way", as required in paragraph 137 of the Operational Guidelines for the Implementation of the World Heritage Convention, and that they should not be included in the nominated series.

Makbarai Mavlono Tojiddin (component part 5) is the only monument of the current nomination, a stand-alone religious site, a mausoleum, and an example of the Muslim vernacular architecture of Khuttal in the late Middle Ages. While the original structure still remains to some extent, a large part of it has been extensively reconstructed, with overall form and appearance significantly altered. The act

of reconstruction was undertaken by the local communities to sustain its function, but at the same time compromised the value of this building as a medieval Muslim vernacular architecture of Ancient Khuttal. Furthermore, the aspect of Muslim activities in Ancient Khuttal is evidenced by other sites such as the mosque at Kalai Hulbuk (component part 2a). ICOMOS therefore considers that Makbarai Mavlono Tojiddin (component part 5) should be removed from the nominated series.

In summary, ICOMOS considers that the inclusion of component parts 5, 7, 9 and 10 dilutes the coherence of the nominated series, and subsequently undermines the integrity of the whole series. ICOMOS considers that the current nomination should be reduced to include only the following seven component parts: Ajinatepa Buddhist monastery (1), Kalai Hulbuk (2a), Shahristoni Hulbuk (2b), Manzaratepa (3), Zoli Zard (4), Halevard (Kofirkala) (6), and Tohir Caravansarai (8).

ICOMOS considers that the comparative analysis overall justifies consideration of a reduced series comprising only component parts 1, 2a, 2b, 3, 4, 6 and 8 for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii), (iii), (iv) and (v).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that Ancient Khuttal illustrates an important interchange of human values over a span of eight centuries in Central Asia. This is reflected in the distinctive architecture, urban planning, and religious beliefs. The property illustrates the integration of cultural influences of several subsequent powers in the region, including the Hephtalites, Turkic Khaganate, Arab Caliphate, and the Samanid, Ghaznavid, and Mongol Empires.

ICOMOS notes that, due to the location of Ancient Khuttal at a crossroads of the Silk Roads, the interchange of human values through the movement of peoples via both migration and trade is well demonstrated by the nominated property.

ICOMOS considers that this criterion is demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the property is made up of a series of rich cultural layers that together provide an exceptional testimony to the disappeared cultural tradition of Ancient Khuttal that existed on the piedmonts of the Pamir from the 7th to the 16th centuries. These layers are evidenced by the remains

of buildings, settlements, religious sites, infrastructure, and numerous artefacts reflecting the emergence and development of this unique independent and semi-independent region of northeastern Bactria and Tokharistan.

ICOMOS observes that although Ancient Khuttal had been intermittently controlled by or absorbed into the surrounding empires, it was never fully integrated into them. Subsequently, its cultures, traditions, and belief systems were influenced by but never fully converted to those of major powers. This criterion requires clarity about what made Ancient Khuttal distinctive, and the specificities that distinguish Ancient Khuttal from neighbouring kingdoms between the 7th and 16th centuries, encompassing its political, economic, technological, cultural, and spiritual roles.

In the additional information provided in February 2025, the State Party explained that, located in Central Asia at a crossroad of the Silk Roads, Ancient Khuttal was a meeting place of settled agricultural peoples, nomads, and mountaineers. This geocultural advantage has resulted in the emergence and development of a unique cultural tradition that is reflected in historical texts and archaeological data. The historical records mainly cover the production of the high-value commodities Ancient Khuttal offered to the international trades, such as gold mining, horse breeding, and salt production; while archaeological data reflects the Ganch carving tradition, Khuttal pottery and glass industries, and the mural paintings that shed light on the stable traditions upheld by peoples at Khuttal despite political upheavals.

ICOMOS considers that this this criterion is demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that Ancient Khuttal represents an outstanding example of fortified settlements typical for northeastern Bactria and Tokharistan and early medieval Buddhist architecture in Central Asia. The fortified settlements of Ancient Khuttal, with their ancient Bactrian and early medieval Tokharistan patterns, illustrate several stages in the history of Central Asia. The combination of Gandhara architecture with the construction techniques of Central Asia led to the emergence of the original Khuttal Buddhist tradition in the 7th and early 8th centuries.

ICOMOS considers that the Khuttal-style fortified settlement and unique Buddhist temple construction techniques have not been defined as the basis for comparison, and are not a common element across the eleven component parts. Therefore, ICOMOS considers that the comparative analysis has not established the nominated series as an outstanding example of a type of building or architectural ensemble that illustrates significant stages in human history in Central Asia.

ICOMOS considers that this criterion is not demonstrated.

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that Ancient Khuttal is an outstanding example of traditional human settlements and water-use practices in the Pamir piedmonts zone. The interaction of its population with nature has led to the emergence of unique town planning and irrigated agricultural practices, with early medieval long-distance canals and water supply systems from the Pamirs.

ICOMOS considers that, while there is evidence within the component parts testifying to water use practices in the region, it is not outstanding within the extensive and advanced water management systems that once existed in the region.

ICOMOS considers that this criterion is not demonstrated.

ICOMOS considers that the proposed reduced series, comprising only component parts 1, 2a, 2b, 3, 4, 6 and 8, meets criteria (ii) and (iii), but that criteria (iv) and (v) have not been demonstrated.

Integrity and authenticity

Integrity

Integrity is a measure of wholeness, intactness, and absence of threats to the nominated property and its attributes. As a serial nomination, integrity is also a measure of whether the component parts collectively contain all the attributes necessary to express in a substantial way the proposed Outstanding Universal Value of the nominated series as a whole, and how each component part contributes to that value.

In the additional information of November 2024, the State Party made some minor revisions to the boundaries for Zoli Zard (component part 4) and Halevard (Kofirkala) (component part 6) to include their moats, while keeping the boundaries of the buffer zone unchanged. The nominated property areas at the two sites have been enlarged by 6.781 ha. ICOMOS welcomes these revisions and considers that these modifications improve the conditions of integrity.

At the individual component part level, all attributes conveying the potential Outstanding Universal Value of the serial property are included in the boundaries of the component parts, with an adequate buffer zone. The factors affecting the property, such as housing and livestock grazing, are under control. The local conditions affecting the physical fabric of the archaeological sites are

mainly controlled by the backfilling of the excavated areas and maintenance

ICOMOS considers that at the serial level, component parts 1, 2a, 2b, 3, 4, 6, and 8 demonstrate strong cultural, social or functional links over time, with each component part contributing to the proposed Outstanding Universal Value of the nominated property as a whole in a substantial, scientific, readily defined and discernible way. ICOMOS considers that the proposed reduced series of seven component parts meets the conditions of integrity.

Authenticity

Authenticity is the ability to understand the values attributed to the nominated property and depends on the degree to which information sources may be understood as credible or truthful.

All the component parts selected for the proposed reduced series are preserved below the ground surface with a high degree of authenticity. At the archaeological sites, sacrificial layers were made in 2006 on the exposed walls using original materials and techniques. However, these protective layers are not now distinguishable from the original walls after years of natural deterioration.

Past interventions at Ajinatepa Buddhist Monastery (component part 1), and Kalai Hulbuk (component part 2a) have to a certain extent affected their authenticity. In the additional information of February 2025, the State Party informed that an overall heritage interpretation strategy for Ajinatepa Buddhist Monastery (component part 1) and Kalai Hulbuk (component part 2a) will be developed as part of the State Program for the Protection of Historical and Cultural Heritage for 2026-2031, in which measures will be incorporated for visitors to distinguish the original parts from the later additions.

ICOMOS appreciates the efforts made by the State Party to present visitors with the authentic parts of the nominated sites. ICOMOS considers that overall, the attributes of the proposed reduced series that convey the proposed Outstanding Universal Values have not been seriously damaged, nor has the source of information been confused between the original parts and the later additions. ICOMOS therefore considers that the conditions of authenticity of the proposed reduced serial property of seven component parts have been met.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the proposed reduced series have been met.

Boundaries

There are no inhabitants within the nominated component parts. The number of inhabitants in the buffer zones of the component parts varies from none (Tohir Caravansarai, component part 8) to 32,100 (Kalai Hulbuk and Shahristoni Hulbuk, component parts 2a and 2b respectively).

The boundary demarcation is based on Article 5 of the Law of the Republic of Tajikistan No. 1429 of 30 May 2017 on the Protection and Use of Historical and Cultural Heritage, which defines the extent of cultural heritage properties as the territory that is functionally connected to the historical and cultural values of such properties. The delineation of the buffer zones is determined by the Decree of the Government of the Republic of Tajikistan No. 274 of 30 May 2008 on the Establishment of Protection Zones of Immovable Objects of Historical and Cultural Heritage. Article 2 of the decree stipulates that the Site Protection Zone is five to ten metres, the Development Regulation Zone is ten to fifty metres, and the Protected Landscape Zone is over fifty metres. A set of regulations for each zone is prescribed in this law.

Based on these legal requirements, the boundaries of the component parts correspond to the territory of the archaeological sites, while the buffer zones are the combination of the protection zone, development regulation zone, and protected landscape zone.

The component parts of the nominated property have been designated as cultural heritage sites of national significance through their inclusion in the State Register of Objects of Historical and Cultural Heritage in 2018. In the additional information received in November 2024, the State Party confirmed that, except for Shahristoni Hulbuk (component part 2b) and Manzaratepa (component part 3), the state certification for all the component parts has been completed. Certification ensures that the boundaries and buffer zones of the component parts are entered into the unified state cadastre system for better protection at the early planning stage. The state certification process for Shahristoni Hulbuk (component part 2b) and Manzaratepa (component part 3) was supposed to be completed by the end of 2024.

Minor adjustments to the component part boundaries have been made to include the moats surrounding Zoli Zard (component part 4) and Halevard (Kofirkala) (component part 6). The modification at Zoli Zard has been rectified by the State Party through its state certification process, while that of Halevard (Kofirkala) will be rectified in 2025.

ICOMOS recommends that the State Party complete the state certification process for Shahristoni Hulbuk (component part 2b) and Manzaratepa (component part 3).

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the nominated series should be reduced to include only the following seven component parts: Ajinatepa Buddhist monastery (1), Kalai Hulbuk (2a), Shahristoni Hulbuk (2b), Manzaratepa (3), Zoli Zard (4), Halevard (Kofirkala) (6), and Tohir Caravansarai (8). The comparative analysis justifies consideration of this proposed reduced serial property for the World Heritage List, and criteria (ii) and

(iii) have been demonstrated. The conditions of integrity and authenticity have been met.

4 Conservation measures and monitoring

Documentation

The component parts of Ancient Khuttal have been documented for decades through archaeological expeditions. The last documentation campaign was carried out in 2022 and 2023 by the International Institute for Central Asian Studies (IICAS) with the support of the Ministry of Culture of the Republic of Tajikistan. It aimed at updating the documentation of the sites in the Khatlon region. The campaign included photogrammetry using a UAV (drone) and a terrestrial SLR camera. Control points using a GNSS and a laser theodolite for additional georeferencing were used for the accurate acquisition of geographic coordinates. The level of documentation is adequate and can be used as the baseline information for future monitoring.

Conservation measures

Backfilling of the excavated parts of the archaeological sites and fencing are the main conservation measures in place. In the additional information in November 2024, the State Party provided a set of detailed maps indicating the positions of all the archaeological excavations in the past, supplemented with a detailed account of the backfilling activities.

The Ajinatepa Buddhism monastery (component part 1) has been fenced off for protection.

Except for the Kalai Hulbuk (component part 2a), all the component parts are accessed freely without any control, which may cause safety and security issues such as looting. ICOMOS raised this issue with the State Party. In the additional information received in November 2024, the State Party confirmed that site safety and security are ensured by a range of mechanisms from the Constitution Law to the Criminal Code and are implemented by the Ministry of Culture of the Republic of Tajikistan via the state inspectors of the relevant Departments of Culture of the Vakhsh, Vose, Dangara, Jaloliddini Balkhi, Farkhor, and Khovaling districts of the Khatlon region. The state inspectors are supported by the custodians from nearby local communities to ensure daily surveillance, supplemented by a list of local custodians. For Kalai Hulbuk (component part 2a), Shahristoni Hulbuk (component part 2b), Manzaratepa (component part 3), and Zoli Zard (component part 4), local museum reserves also take responsibility for protecting the sites. The State Party confirmed that, by November 2024, no cases of looting or destruction were registered at the nominated component parts.

Monitoring

The nominated property is monitored according to seven parameters: conservation, protection, managing change, research, sustainable tourism, interpretation, and local community. The monitoring activities are conducted by the

Ministry of Culture of the Republic of Tajikistan. The latest monitoring was undertaken at the end of 2023, and the reports are deposited in the archive of the Ministry of Culture.

ICOMOS considers that while the monitoring system will enable progress in management and protection to be tracked, and could help identify relevant trends, most of the indicators are not tied directly to the state of conservation. A more detailed set of monitoring indicators should be developed for both the nominated property as a whole and for each component part, and monitoring frequency should be adjusted according to the needs of each indicator. In addition, monitoring arrangements should include site management bodies, local communities, and academic institutions as necessary so that rapid action can be undertaken when needed.

Furthermore, ICOMOS notes that there is no indication of whether the current monitoring system has been established and is functioning. The State Party confirmed in the additional information of November 2024 that the implementation of a monitoring system for component parts is intended to be included in the State Program for the Protection of Historical and Cultural Heritage for 2026-2031. This was again confirmed in the additional information of February 2025.

ICOMOS is aware that the local custodians are essential for daily monitoring. They have been equipped with a mobile phone application to record site conditions in real time. ICOMOS welcomes this endeavour and considers that capacity building for the local custodians is critical for the monitoring system to be effective.

ICOMOS considers that the current documentation is comprehensive and can be used as baseline information for site management and monitoring. Conservation measures in place are effective. The annual capacity building for the local custodians should be guaranteed. A monitoring system should be established and implemented with indicators and administrative arrangements improved to enhance the timely response to emergency events, identify trends and support the long-term state of conservation. ICOMOS considers that it would be advisable that the monitoring system is conceived for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

All the component parts are state-owned.

The legal instruments for the protection of the nominated property are based on the Constitution of the Republic of Tajikistan, with the Law on Culture (1997), the Law on Protection and Use of the Objects of Historical and Cultural Heritage (2006), the Law on Museums and Museum Fund (2004), and the Law on Export and Import

of Cultural Items (2001) as the specific legal instruments for the protection of cultural heritage, both tangible and intangible. This legal framework is supported by a number of government decrees.

All the component parts have been designated at the national level of protection, and gazetted into the state register, with property areas and buffer zones legally protected under strict legal provisions.

The Ministry of Culture is the main government department for implementing cultural heritage-related laws. This administrative arrangement changed since the nomination dossier was submitted. In the additional information of November 2024 the State Party advised that the Agency of Historical and Cultural Heritage Protection was established in March 2024 for the future management of the nominated series. A process of transferring responsibilities from the Ministry of Culture to the Agency is scheduled for 2025-2026.

In its interim report, ICOMOS requested further information about the responsibility, structure, and position of the Agency in the national administration system, and how it will manage each individual component part. The State Party responded in February 2025 that the responsibility of the Agency includes implementing state policy, documentation and inventory. and planning and organisation of works for research. maintenance, conservation, use, regeneration, and promotion of cultural heritage properties. The Agency has departments. eleven subordinate organisations, and five regional departments. It is an independent national body under the Government of the Republic of Tajikistan, and operates with funds from the state budget.

ICOMOS notes that this change has elevated the status of historical and cultural heritage protection from one sector of a ministry to an independent government body with exclusive responsibility. ICOMOS considers, however, that the administration change has brought some uncertainties regarding the management system. ICOMOS recommends that the State Party redefine the management arrangement for the nominated property as soon as the process of transferring responsibilities between state bodies has been completed.

Management system

The management system is based on the protection of the proposed Outstanding Universal Value and its attributes. Currently, the Ministry of Culture is the top management institution, with its Administration of Culture of Khatlon Region as the coordinating body and the Department of Culture at the district level as site managers of the nominated component parts. In addition to this management arrangement, Khulbuk State Historical and Cultural Museum-Reserve and Dangara Republican Museum play a role in managing the component parts located in the Vose and Dangara Districts. The management is assisted by the local custodians living near the component parts for daily surveillance, monitoring, and

maintenance. In the future, the Agency of Historical and Cultural Heritage Protection will take over these responsibilities.

The number of employees of the regional and site management bodies varies from 7 to 156, including inspectors, architects, archaeologists, museum staff, craftsmen, and guides, with professional skills such as archaeology, conservation theory and techniques, management, interpretation, awareness, risk monitoring, and GIS. In addition to the government sources, expertise for training and consultation can be sought from the Institute of History, Archaeology, and Ethnography of the Tajikistan Academy of Sciences, the State Scientific and Production Institution for the Restoration of Historical and Cultural Monuments of the Ministry of Culture of the Republic of Tajikistan, and specialised university departments. Capacity building is supported by the government through the State Programme on the Protection and Use of Historical and Cultural Heritage for 2021-2025. The opportunity to participate in international training courses is available, and the Tajik National University, Tajik State Institute of Arts, Russian-Tajik University, and Kulyab State University provide undergraduate and graduate programmes and courses on cultural heritage protection, conservation, management, and use.

ICOMOS recognises that the skills of the local custodians are essential for the safety, security, and good conservation of the nominated component parts. In its interim report, ICOMOS requested further information on the capacity-building opportunities available to the local custodians in order to improve their skills and on the frequency of these training sessions. The State Party responded in February 2025 that the Ministry of Culture of the Republic of Tajikistan regularly holds capacity-building activities. More training of local custodians is planned in 2025 and annual capacity-building after 2025 has been included in the State Program for the Protection of Historical and Cultural Heritage for 2026-2031, which will be implemented by the Agency of Historical and Cultural Heritage Protection.

The main source of funding for research, conservation, and maintenance of the component parts is the national budget. It is complemented by additional extra-budgetary funds from regional and local budgets and sponsors on an annual basis in accordance with the legislation. A detailed budget will be provided in the action plans under the management plans of each component part.

The management is guided by seven strategic objectives defined by the current management system, including conservation, protection, managing changes, research, sustainable tourism, interpretation, and the local community. These objectives are subject to monitoring, as detailed above.

There is no management plan for the nominated property as a whole. The Ministry of Culture of the Republic of Tajikistan has started the process of developing separate management plans for each component part within its management system and objectives. Currently, the draft Management Plan of Ajinatepa Component Part has been developed and is under review.

In additional information submitted in November 2024, the State Party provided details of the measures to be included in the State Program for the Protection of Historical and Cultural Heritage for 2026-2031. This list has been expanded and confirmed by the additional information received in February 2025. It includes seventeen programmes which address all the major issues raised by ICOMOS. Among the programmes in the list, six are related to the nominated series as a whole, which are updating overall management, preparing strategies for disaster risk preparedness, heritage interpretation, and tourism management, introducing Heritage Impact Assessment procedures for the World Heritage properties in the country, and organising annual capacity building for local custodians. The other eleven programmes in the list relate to individual component parts, such as updating and developing management plans for the component parts with monitoring mechanisms, and implementation of mitigation measures aimed at preventing Tohir Caravanserai from erosion of the left bank of the Toirsu River. ICOMOS considers that these actions should be regarded as priority and implemented as soon as possible.

Visitor management

Currently, the Decree of the Government of the Republic of Tajikistan of 8 August 2018 No. 372 on the Strategy for the Development of Tourism in the Republic of Tajikistan for the period until 2030 is the top-level tourism policy document in which tourism in the Khatlon region has been identified as one of the priority areas of the economy of the region. It indicates that the annual number of visitors to the region has been increasing and will increase further with the four tourism campaigns operating in the region. Historic, cultural, and religious tourism are among the priority areas of tourism in the region.

Currently, all the component parts are accessible to visitation by roads. The visitor facilities are very limited. Parking, toilets, waste bins, and benches are available only at Kalai Hulbuk (component part 2a). Interpretation boards in Tajik, Russian, and English have been installed at the Ajinatepa Buddhist monastery (component part 1), and Halevard (Kofirkala) (component part 6), but need to be updated.

The Khulbuk State Historical and Cultural Museum-Reserve, opened in 2006, currently serves as the interpretation centre for Kalai Hulbuk (component part 2a) and Shahristoni Hulbuk (component part 2b). It has the potential to act as the interpretation centre for the serial property as a whole.

The State Party is planning to provide basic visitor facilities at other component parts under the State Programme, with prior Heritage Impact Assessment. The State Party also plans to develop a single interpretation strategy and branding of the Ancient Khuttal serial property, which will

include the development of a website and installation of interpretation boards.

ICOMOS considers that while tourism can certainly stimulate the local economy, most of the component parts are currently not prepared to receive tourists on a regular basis. Adequate tourist and interpretation facilities have to be in place before the nominated property can be utilised as a tourist attraction. In addition, a comprehensive interpretation strategy should be developed for the proposed reduced series as a whole and for each individual component part in order to better communicate the value of the nominated property to visitors. In the additional information of February 2025 the State Party indicated that the preparation of a comprehensive heritage interpretation strategy and a tourism management strategy for the nominated series are intended to be included in the State Program for the Protection of Historical and Cultural Heritage for 2026-2031 and implemented in 2026.

Community involvement

Several workshops and conferences in the last decade were organised by the Ministry of Culture, with the support of the International Institute for Central Asian Studies, local and international experts, and the relevant stakeholders, for the preparation of the nomination dossier. In the management plans to be developed for each component part, community involvement will be strengthened.

In its interim report, ICOMOS requested more information on how a potential inscription on the World Heritage List will benefit local communities and how they are involved in the decision-making processes. The State Party responded in February 2025 that the local communities involved in the decision-making are mainly through the local custodians and *jamaats* (the self-governing body of the settlements in the vicinity of the component parts) via regular meetings since March 2023. Furthermore, the State Party confirmed that the involvement of local communities in the decision-making process will be incorporated in the management plans for individual component parts to be developed in 2026. ICOMOS welcomes this commitment and considers that the local custodians should be included in the decision-making process.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection is robust. The process of transferring responsibilities between the Ministry of Culture and the Agency of Historical and Cultural Heritage Protection has resulted in some uncertainties in the current management arrangements, which should be updated as soon as the Agency has taken full responsibility. The management system should also be improved through the development, as a matter of priority, of a management plan for the reduced nominated series as a whole and for each of its component parts. The disaster risk preparedness plans for all component parts should be finalised and implemented, and mitigation measures to prevent the destruction of the Tohir Caravanserai from the erosion of the Toirsu River bank should be put in place. A mandatory

Heritage Impact Assessment procedure for any new development in the buffer zones of the component parts should be established, in accordance with the commitment made by the State Party. A monitoring system for each component part should be developed and implemented. The tourism strategy and the comprehensive interpretation strategy for the nominated reduced series, as a whole and for each of its component parts, as envisaged by the State Party, should be developed and implemented as soon as possible. Finally, community involvement should be strengthened, as well as the role of local custodians in the decision-making process of the management system.

6 Conclusion

Ancient Khuttal was a medieval kingdom located in a relatively closed geographic unit bounded by two rivers and the Pamir Piedmont ridges. Historically, it has been at the periphery of major regional empires such as the Hephtalites, Turkic Khaganate, Arab Caliphate, and Samanid, Ghaznavid, and Mongol Empires, and maintained its independent and semi-independent state between the 7th and 16th centuries CE. It was never fully absorbed into these powerful dynasties; it was culturally influenced by these empires, but never fully belonged to them. Ancient Khuttal demonstrated diversified cultural features, which have been further enriched by the movement of peoples through migration and the Silk Road trade. Acting as an active player and a production centre of this significant Silk Roads corridor, it contributed to the interchange of human values not only by relaying goods but also by offering its own high-value commodities such as salt, gold, silver, and locally-bred horses.

The series of component parts comprise capital cities, production centres, settlements, religious complexes, and trade facilities, which illustrate the multifaceted cultures of Ancient Khuttal, and manifest the interchange of human values.

The comparative analysis amongst component parts indicates that component parts 5, 7, 9 and 10 have not demonstrated their substantial contributions to the proposed Outstanding Universal Value. ICOMOS considers that these component parts should be excluded and recommends that the nominated series be reduced to only comprise component parts 1, 2a, 2b, 3, 4, 6, and 8.

The proposed reduced series meets criteria (ii) and (iii), but criteria (iv) and (v) have not been demonstrated. Its conditions of integrity and authenticity are met for the proposed reduced series.

The state of conservation is generally stable, and factors affecting the proposed reduced series are under control. The legal protection is robust. With strong governmental control, law enforcement has been stringent, and encroachment on the nominated property has been effectively prevented. The establishment of the Agency of Historical and Cultural Heritage Protection has

strengthened the protection of cultural heritage, but due to the current process of transferring responsibilities, some uncertainties remain regarding management arrangements.

Adjustments to the management system and boundaries should be made in light of the recommended reconfigured series, as well as addressing issues regarding management, monitoring, tourism management and interpretation at individual component parts. The State Program for the Protection of Historical and Cultural Heritage for 2026-2031 should be implemented.

Finally, ICOMOS recommends that the name of the reduced nominated series be changed. to

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of Ancient Khuttal, Tajikistan, be **referred back** to the State Party to allow it to:

- Reduce the nominated series to include only the following component parts: Ajinatepa Buddhist monastery (1), Kalai Hulbuk (2a), Shahristoni Hulbuk (2b), Manzaratepa (3), Zoli Zard (4), Halevard (Kofirkala) (6), and Tohir Caravansarai (8),
- Complete the state certification process for the Shahristoni Hulbuk (2b) and Manzaratepa (3) component parts,
- Adjust the management and monitoring systems to fit the proposed reduced series,
- Provide information on the management system for the reduced nominated series following the process of transferring responsibilities from the Ministry of Culture to the Agency of Historical and Cultural Heritage Protection,
- Developing an overall management plan for the proposed reduced series as a whole, tourism management plan and interpretation plan for the revised nominated property,
- Completing the management plans for each component part,
- Preparing disaster risk preparedness plans for each component part;

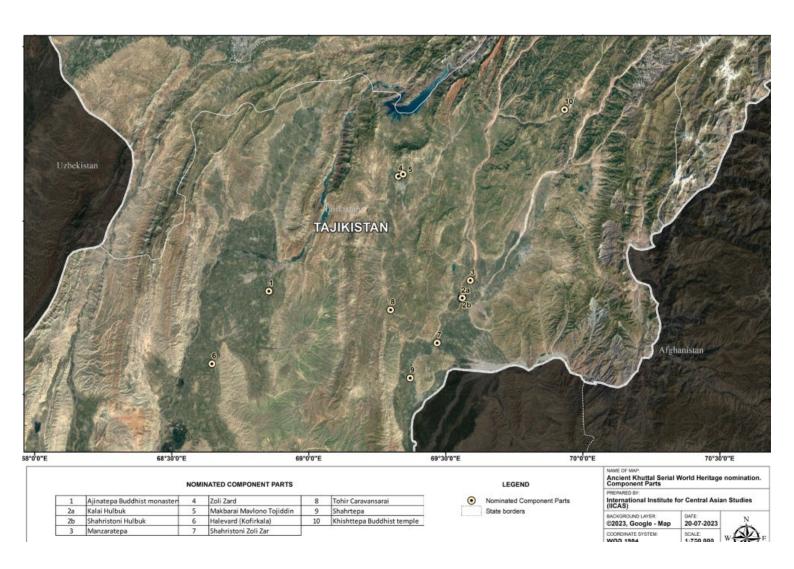
Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

 a) Implementing mitigation measures to prevent the destruction of the Tohir Caravanserai (8) from Toirsu River erosion.

- b) Conducting conservation interventions and daily maintenance for the exposed architectural structures of the Ajinatepa Buddhist Monastery (1), Kalai Hulbuk (2a), and Halevard (Kofirkala) (6) to address the issue of deterioration by natural elements and vegetation growth,
- Backfilling the two areas excavated in the 2017-2020 campaign at Shahristoni Hulbuk (2b),
- d) Establishing and implementing the monitoring system with improved indicators and administrative arrangements to ensure timely response to emergency events, to identify trends and to support the state of conservation in the long term,
- e) Introducing a Heritage Impact Assessment procedure for any new developments in the buffer zones of the component parts,
- f) Undertaking capacity building for the local custodians on a regular basis,
- g) Enhancing the involvement of local communities and the role of local custodians in the decision-making process.

ICOMOS recommends that the name of the revised nominated property be changed, to reflect the reduced series, to: "The Cultural Heritage Sites of Ancient Khuttal".



Map showing the location of the nominated component parts

Yen Tu Complex of Monuments and Landscapes (Viet Nam) No 1732

1 Basic information

Official name as proposed by the State Party

Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes

Location

Dong Trieu Town Uong Bi City Quang Yen Town Quang Ninh Province

Chi Linh City Kinh Mon Town Hai Duong Province

Yen Dung District Viet Yen District Bac Giang Province

Viet Nam

Brief description

Located in the forested mountains, rural lowlands, and riverine locales of north-eastern Viet Nam. the Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes is comprised of twenty component parts. The Yen Tu Mountain Range was the home of the Tran Dynasty during the 13th and 14th centuries and the birthplace of Truc Lam (Bamboo Forest) Buddhism, a Zen sect unique to Viet Nam that played a key role in shaping a powerful, independent Dai Viet kingdom. This landscape comprises standing and archaeological remains of pagodas, temples, shrines, and other tangible and intangible heritage related to Buddha, national heroes, and key historical events, making it a living cultural heritage that is visited by many pilgrims today. Sites for religious worship have been placed in favourable geological and topographic settings with readily available natural resources.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of twenty *sites*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

1 February 2021 as "The Yen Tu Complex of Monuments and Landscapes"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation, and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 5 to 15 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 26 September 2024 requesting further information about maps of the component parts, attributes of Outstanding Universal Value, comparative analysis, buffer zones, protection and management, major threats and conservation, visitation and presentation, research, funding, and monitoring.

Additional information was received from the State Party on 9 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the general narrative of the nomination, the distinguishing characteristics of Truc Lam Buddhism, the difference between the use of criterion (v) and the concept of a cultural landscape, authenticity and reconstruction, intangible heritage, the risk of fire and theft, and community involvement.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated serial property is located in forested mountains, rural lowlands, and riverine locales in and near the Yen Tu Mountain Range, part of the Dong Trieu Arc, the easternmost and largest of four adjacent arc-shaped mountain ranges within the provinces of Quang Ninh, Bac Giang, and Hai Duong in north-eastern Viet Nam. It was the territory of the Tran Dynasty in the 13th and 14th centuries and the birthplace of Truc Lam (Bamboo Forest) Buddhism, a Zen sect unique to Viet Nam.

The tangible cultural heritage in this area associated with Truc Lam Buddhism and the Tran Dynasty includes hundreds of temples, shrines, mausoleums, pagodas, stupas, statues, steles, hermitages, pilgrimage routes, caverns, and stake-yards (which are areas where wooden stakes were driven in the ground to form a military barricade). Some of these are intact, while others are archaeological remains, reconstructions or recent additions.

The intangible heritage includes ceremonies, rituals, festivals, folk games, writings, and pilgrimages, some of which have been designated by the State Party as National Intangible Cultural Heritage.

There are also important artefacts associated with the sites, including the 3,050 "Woodblocks of Vinh Nghiem Pagoda, Bac Giang Province" (component part 12) inscribed on UNESCO's Asia-Pacific Memory of the World regional Register in 2012.

The close association of people with the environment is expressed by the strategic and harmonious location of sites used for worship within favourable topographic and geological settings such as mountain ridges, valleys, rivers, and rock formations, where natural resources are readily available.

The State Party considers that the selected component parts collectively illustrate the rich cultural and historical heritage of the region, epitomising the enduring influence of Truc Lam Buddhism as well as human adaptation to nature. Most of these component parts are surrounded by protected landscapes or special-use forests.

Most of the component parts have significant archaeological evidence of structures dating to a wide range of periods from as early as the Palaeolithic (c. 450,000 years ago) through the Ly (1009-1225 CE) and Tran (1225-1400 CE) dynasties to the Nguyen Dynasty (1802-1945 CE). Many have standing structures of various dates, some of which are of very recent construction.

The component parts are associated with five historical stages: the homeland of the Tran Family, including the resting and worshipping places of the royalty of the Tran Dynasty; the life and religious career of the Buddha-King Tran Nhan Tong and the birth of Truc Lam Buddhism; the life and career of Second Patriarch Phap Loa and Third Patriarch Huyen Quang and the propagation period of Truc Lam Buddhism; the revival and integration period of Truc Lam Buddhism; and the role and influence of Truc Lam Buddhism in Dai Viet life and the Vietnamese tradition of land and water use.

The Tran Family homeland

- Component part 1: Thai Mieu (Imperial Ancestral Shrine)
- · Component part 2: An Sinh Temple
- Component part 3: Thai Lang Mausoleum
- Component part 4: Kiep Bac Temple

Component parts 1 to 4 are related to the homeland of the Tran Family and to the resting and worshipping places of the Tran Dynasty royalty. The present-day An Sinh Temple was rebuilt in 2000. The oldest structures of Kiep Bac Temple were built during the Nguyen Dynasty (1802-1945) and restored at the beginning of the 20th century.

The birth of Truc Lam Buddhism

- Component part 5: Bi Thuong Pagoda
- Component part 6: Suoi Tam Pagoda
- · Component part 7: Cam Thuc Pagoda
- Component part 8: Chua Lan Pagoda
- Component part 9: Hoa Yen Pagoda Relic Cluster
- Component part 10: Ngoa Van Hermitage-Pagoda relic cluster

Component parts 5 to 10 are related to the life and religious career of Buddha-King Tran Nhan Tong and the birth of Truc Lam Buddhism. Most of Bi Thuong hill (component part 5) was levelled a few decades ago and the current pagoda was built in 1993. The Suoi Tam Pagoda was reconstructed in 2009-2011, an older one having burned down. The Cam Thuc Pagoda was built in 1993 on an older foundation. In 2002, a new Chua Lan Pagoda was constructed on the old foundation. In the Hoa Yen Pagoda Relic Cluster (component part 9), the Giai Oan Pagoda was rebuilt in 1994, a new Hoa Yen Pagoda was built in 2002, the present Mot Mai Pagoda was built in 1853, the present Van Tieu Pagoda was renewed in 2003, and the Chua Dong Pagoda was reconstructed in concrete in 1930 and rebuilt again in 2007. The hermitage at the Ngoa Van Hermitage-Pagoda was rebuilt in 2012.

The propagation of Truc Lam Buddhism

- Component part 11: Ho Thien Pagoda
- Component part 12: Vinh Nghiem Pagoda
- Component part 13: Thanh Mai Pagoda
- Component part 14: Con Son Pagoda

Component parts 11 to 14 are related to the life and career of Second Patriarch Phap Loa and Third Patriarch Huyen Quang and the propagation period of Truc Lam Buddhism. The Ho Thien Pagoda (component part 11) was greatly

expanded in the 17th-18th century. The Thanh Mai Pagoda (component part 12) was rebuilt in 2009.

The revival and integration of Truc Lam Buddhism

- Element 10.2: Da Chong Pagoda (located in component part 10)
- Component part 15: Bo Da Pagoda
- · Component part 16: Nham Duong Pagoda

Component parts 15 and 16 are related to the revival and integration period of Truc Lam Buddhism. Component part 10 comprises structures that relate to this historical stage as well as to the birth of Truc Lam Buddhism stage.

The role and influence of Truc Lam Buddhism

- Component part 17: Kinh Chu Cavern
- Component part 18: Yen Giang stake-yard
- Component part 19: Dong Van Muoi stake-yard
- · Component part 20: Dong Ma Ngua stake-yard

Component parts 17 to 20 are related to the role and influence of Truc Lam Buddhism in Dai Viet life, including the Vietnamese tradition of land and water use. Three of the four component parts are archaeological sites comprised of a stake-yard created to disrupt enemy movements during a battle at the Bach Dang River in 1288.

The nominated series includes several National Monuments and Special National Monuments across the three provinces of Quang Ninh, Hai Duong, and Bac Giang.

The area of the twenty component parts totals 628.488 ha, with buffer zones totalling 5,838.26 ha.

The Yen Tu Mountain Range reflects both the spiritual depth of the Tran Dynasty period and the role the region played in trade and cultural exchange. The ability of people to adapt to the natural environment is evident in the monuments and landscapes they created, showcasing the historical relationship of the Dai Viet people with their environment and their traditional bonds with land, water, and sea.

The Yen Tu Mountain Range and surrounding areas are historically significant as the heart of Giao Chau (ancient Viet Nam). During the 13th and 14th centuries, it became a strategically important territory of the Tran Dynasty, and the "holy land" of Truc Lam Buddhism. This area served as the base for the rise of the Tran Family to power and prosperity, eventually leading to its victory over Mongol invaders at the Bach Dang River in 1288. Following this victory, King Tran Nhan Tong and his disciples founded Truc Lam Buddhism, a uniquely Vietnamese form of Buddhism that blended Confucianism, Taoism, and indigenous beliefs. This Buddhist school aimed to foster national unity, independence, and resilience, thereby playing a central role in defending the Dai Viet kingdom against foreign threats and contributing to its development. The principles of Truc Lam Buddhism promoted peace, self-reliance, and active engagement with the world.

This Buddhist sect became the ideological foundation of the Tran Dynasty culture and society. It united the Tran royal court, the armies, and the local communities, giving them purpose and strength that enabled the building of a strong Dai Viet kingdom that halted the spread of Mongolian occupation and influence in East and Southeast Asia.

The Tran feudal dynasty lasted from 1225 to 1400. Agriculture was expanded by building dikes, excavating canals, and diversifying agricultural crops and products, and weapon and warship manufacturing was developed. Ceramics, metalwork, textiles, carving, and worship items were produced, with domestic and foreign trade engaged through major trading centres. The Tran Dynasty started to decline after the death of King Tran Minh Tong in 1357.

Truc Lam Buddhism also declined when more attention was given to Confucianism and Taoism, and further waned during the Chinese occupation in the 15th century, during which Buddhist pagodas were destroyed and manuscripts were confiscated. The Truc Lam sect gradually faded over the following centuries, disappearing for the most part until the late 20th century when Truc Lam re-emerged as a popular movement. By the early 21st century, Truc Lam Buddhism had spread from Viet Nam as far afield as Ukraine and the United States of America.

In the Yen Tu area, almost every monument has a festival. In Dong Trieu are the An Sinh Temple festival, Ngoa Van Pagoda festival, and Ho Thien Pagoda festival. All the monuments, including Yen Tu, Vinh Nghiem, Con Son, Kiep Bac, and Bo Da, have spring festivals and occasionally autumn festivals. Many festivals, which can last from one to three months, are recognised as National Intangible Cultural Heritage. Some attract very large numbers of pilgrims.

State of conservation

The State Party indicates that the component parts have received appropriate attention and care, in most cases for many decades, as National Monuments or Special National Monuments.

Due to the large number and wide range of types of elements, information presented here on the current state of conservation of the nominated series is subdivided into four different sections: religious buildings; archaeological sites and artefacts; landscapes and natural environments; and intangible heritage.

Most of the religious buildings can be categorised as modern, newly restored or ancient. In some cases, wooden structures or parts thereof from the Le Trung Hung (Revival Le) period (1533-1789) are preserved. These include, for example, the Vinh Nghiem Pagoda (component part 12), Bo Da Pagoda (component par 15), and Kiep Bac Temple (component part 4). In other cases, the originals were lost due to wars or fires and replaced with old elements from other monuments, or newly built. Some of the wooden elements have to be replaced after about sixty years. The renovation interventions use traditional techniques as well

as traditional forms and designs. Most wooden relics, especially those made from hardwood, are well preserved and in good condition.

A number of brick, stone, and terracotta stupas, especially those located on slopes, have subsiding foundations. This leads to cracking, and in some cases the risk of collapse. Some of the stupas, especially in the humid mountain areas, are invaded by plant growth (lichen, moss, ferns, etc.), which puts the surfaces at risk due to cracking and peeling. They have undergone little restoration.

The caves, rock shelters, and natural religious icons included in the nominated property are generally in a good state of conservation.

Many of the standing monuments are located on top of archaeological remains, as is the case with the Con Son Pagoda (component part 14), Kiep Bac Temple (component part 4), and Thanh Mai Pagoda (component part 13), for example. In most cases, archaeological excavations have involved only small test pits, which have been backfilled after documentation. Some sites such as the Thai Mieu Imperial Ancestral Shrine (component part 1) have been fully excavated, investigated, and backfilled. The Thai Lang Mausoleum (component part 3) has an outdoor exhibition.

Artefacts are left exposed if they are elements of worship. These include Buddha statues, worship items, and stone steles. Other artefacts have been transferred to one of the three provincial museums or stored at the monument sites (construction materials, for example). Some of the exposed artefacts are protected by roofs, while others are fenced. The An Ky Sinh statue, the reclining Buddha in the Thien Phu Thanh Hu area, the Amitabha stone stele, and the Thien Mon stone stele remain exposed outside, though the State Party indicates that these will be given better protection in the future. By law, all archaeological artefacts must be studied and documented. Quang Ninh Province is currently building an exhibition house for artefacts.

At the ancient Bach Dang River battlefield, three stakeyards have been excavated during archaeological research and are preserved *in situ*. Many of the wooden stakes are in good condition because they are made of very hard wood and have been fully immersed in water. The excavation process of these stake-yards has been documented and the riverine sites are backfilled except for those parts left exposed for exhibition.

The landscapes and natural environments of the component parts are described by the State Party as being in a natural condition and little affected by human activities, except for the presence of the religious monuments. Limestone quarrying and coal mining in the past have altered the landscape in some of the foothills in the buffer zones. All quarrying and mining activities are now prohibited. Some limited sand mining in the upstream area of the buffer zones causes bank erosion that threatens some monuments.

Cable car systems for tourists at some of the monuments have an aesthetic impact on the landscape, but are located far from the monuments themselves. The access provided by cable cars helps to protect the ancient pilgrimage routes, especially the passage from the Giai Oan Pagoda through the red pine pilgrimage route to the Hon Ngoc and Hue Quang stupa gardens, and to the Hoa Yen Pagoda (component part 9).

Monuments such as the Vinh Nghiem and Bo Da pagodas (component parts 12 and 15) on the lowland plains have been affected to a limited degree by village growth and associated transportation infrastructure. Some of the rivers in the area are affected by domestic wastewater and agricultural fertilizer run-off. Local authorities are making efforts to resolve these problems.

The intangible heritage at the nominated property includes religious ceremonies, texts on steles and woodblocks, literature, art and crafts, as well as traditional and indigenous knowledge. Typical rituals and ceremonies related to Truc Lam Buddhism are the Mong Son foodgiving ceremony at the Con Son Pagoda and the Hau Dong trance ceremony at the Kiep Bac Temple, which was inscribed on the UNESCO Representative List of the Intangible Cultural Heritage of Humanity in 2016. Other festivals and ceremonies have national recognition. Most visitors to the area are pilgrims who participate in these celebrations. Traditional indigenous knowledge has been preserved within the communities and maintained through ceremonies and crafts within the everyday lives of the people.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressures, mining and quarrying, pollution, climate change and extreme weather phenomena, fire, mould and termites, visitor pressure, lack of infrastructure and services, and waste management.

The three provinces in which the nominated component parts are located are experiencing dynamic economic growth and development. In response, the three main population centres near the nominated property have development strategies and master plans, and the growth of new residential areas in the vicinity of the nominated property is being regulated to avoid negative impacts.

Mining and quarrying (coal, clay, construction stone, sand) was common in the region and even affected some of the heritage areas through landslides and soil erosion. Today, all mineral extraction is strictly prohibited in the nominated property. Illegal coal mining is a problem that is being addressed by offering alternative sustainable

livelihoods to people involved in the activity. Further afield, but nevertheless close to the West Yen Tu Historic Relic and Scenic Area, mining is permitted, but is carefully regulated. The Law on Environmental Protection (2020) aims to control low levels of pollution that are experienced in some of the lowland areas of the nominated property.

Due to climate change, extreme weather phenomena such as typhoons, thunderstorms and floods have increased in frequency and intensity. However, the State Party highlights that the sites for the construction of pagodas and other religious buildings were selected to ensure the stability and safety of these structures.

Fires in the wooded areas are a risk, but wildfires are rather seldom and have had little impact. More dangerous are fires connected to ritual practices, including incense and votive paper burning, which increases the risk of fire in buildings with wooden structures. Measures such as fire drills, better fire-fighting techniques, and more fire prevention and fighting equipment have been adopted by the State Party to strengthen its fire prevention and fire-fighting capacity.

In the additional information of February 2025, the State Party indicated that the risk of theft for several of the artefacts kept inside the temples (statues, woodblocks, sutras, worship objects) is high, because of the material, historic or artistic value of the objects. However, it is considered that since most of the visitors come for religious and spiritual purposes, the actual risk of theft is minimal. Furthermore, all three provinces have arranged adequate personnel and installed equipment such as surveillance cameras to prevent theft and maintain security and order at all relic sites.

Stone structures in the humid forest environment are subject to algae, mould, and plant growth, and wooden structures are prone to mould and termites. The responsible Management Boards use cleaning programmes to combat these impacts.

Tourism and visitation have seasonal peaks that in most cases are directly tied to religious festivals. This can cause temporary overcrowding, which in turn leads to severe stress on the tourism service infrastructure system. This includes a lack of toilets and waste collection points as well as deficiencies in waste processing, resulting in detrimental effects on the environment and the experience of pilgrims. However, most of the component parts, especially those that are more remote and difficult to reach, do not suffer from overcrowding.

ICOMOS considers that the state of conservation is adequate and that factors affecting the nominated property are currently under control but need to be carefully monitored.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Yen Tu Mountain Range, the backbone of the Dai Viet kingdom, was a strategic location for establishing political strength and security, for economic development especially through trade, and for cultural exchange with neighbours, including the development of religions.
- Truc Lam Buddhism originated in the Yen Tu Mountain Range and spread from there. A unique Vietnamese Zen sect, Truc Lam merged the principles of Mahayana Buddhism with the quintessence of Taoism, Confucianism, and indigenous beliefs to become the religion of the nation.
- During the 13th and 14th centuries, the Tran Family created one of the most notable feudal dynasties in the history of Viet Nam. The Yen Tu Mountain Range was the home of the eastern court of the Tran Dynasty and is the final resting place of many kings and royal members of the family.
- The establishment of a stronghold of Tran rulers there, allied with Truc Lam Buddhist leaders, fashioned a distinctive cultural landscape in which the close association of people with the environment is expressed by the strategic and harmonious selection of sites used for worship, socio-economic development, and military defence.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: standing structures such as temples, mausoleums, pagodas, hermitages, steles, stupas, gate entrances, and bell and drum towers; archaeological vestiges and artefacts such as structural elements, architectural layouts, elements, forms and designs, building materials and fabric, metal works, pottery and ceramic wares, wood works, worship articles, and stake-yards; landscape features such as mountain ridges, valleys, rivers, streams, lakes, waterfalls, caves, rock shelters, and rock formations; and intangible cultural heritage such as festivals, rituals, traditional and indigenous knowledge, literature and inscriptions (on woodblocks, for example).

ICOMOS observes that the nomination attempts a very complex plural narrative that intertwines the development of a religion with the birth of a nation. The broad scope of the nomination is mirrored in the wide range of proposed attributes located in twenty component parts. The intended connection between the different dimension of the narrative is made clear by the State Party, especially in light of the additional information it provided in November 2024 and February 2025.

The State Party also reiterated that the proposed Outstanding Universal Value is based on a complex interaction between a place (the Yen Tu Mountains), a religious belief (Truc Lam), and a political strength (Tran Dynasty) that evolved over time and is manifested in the unique landscape of today. ICOMOS believes that some elements included in the nomination, such as the stakeyards, are not sufficiently connected to the main theme of Truc Lam Buddhism. In addition, the narrative concerning the political strength of the Tran Dynasty can only partially be explored if the geographical scope is limited to the Yen Tu region.

ICOMOS considers that the proposed attributes reflect different dimensions of the narrative, and thus appear disjointed. It is therefore suggested that the State Party explore the idea of focusing on the attributes that speak to the origin and development of Truc Lam Buddhism, which is arguably the main aspect of the nomination. This would give the nomination a sharper focus, without the challenge of adequately addressing the development of Viet Nam as a nation at the same time. Furthermore, ICOMOS considers that no convincing argument has been presented to demonstrate that the proposed plural narrative has universal value.

A second significant issue has been raised in the ICOMOS interim report, that is the difficulty of distinguishing Truc Lam Buddhism and its physical expressions from other forms of Buddhism in the region. In the additional information of February 2025, the State Party stated that Truc Lam Buddhism differs little in its physical expressions from other Buddhist sects: rather. the main difference lies in its ideology. The State Party also contends that Truc Lam Buddhism pagodas and stupas tend to use simple images and less elaborate decorations, due to the pre-eminent idea of "active engagement" combined with the influence of Confucianism. It indicates that this is quite different from Buddhist structures of the earlier Ly Dynasty (1009-1225), which are often large in scale and elaborately decorated. No explicit comparisons have been provided to confirm the distinctiveness of the physical expressions of Truc Lam Buddhism.

ICOMOS nevertheless considers that a revised nomination could have the potential to justify Outstanding Universal Value, provided that these major issues can be resolved by the State Party.

Comparative analysis

The comparative analysis has been developed around properties within the region that have been inscribed on the World Heritage List and whose Outstanding Universal Value is based on the heritage of religion, especially Buddhism, as well as sites included in the Tentative Lists of States Parties.

Twenty properties already on the World Heritage List were initially chosen from the Asia region as being similar to the nominated property in their focus on the heritage of religion. Ten of these were inscribed on the basis (at least) criteria (iii) and (vi); the rest were eliminated from consideration for being inscribed under different criteria. The ten selected

properties represent Hinduism (3), Theravada Buddhism (4), and Mahayana Buddhism (3).

The seven properties that are linked to Theravada and Mahayana Buddhism are compared in some detail to the nominated property. The State Party points out differences connected to the exclusive focus on religion of the selected comparators and the lack of human interaction with the natural landscape or evidence thereof. The State Party further highlights the continuity of use of the nominated property throughout the centuries. It is also argued that the nominated property has more extensive values than these seven properties, based on the fact that some specific elements present in it are missing in the selected comparators.

Similarities were identified with the Sacred Sites and Pilgrimage Routes in the Kii Mountain Range (Japan, 2004, criteria (ii), (iii), (iv) and (vi)); the Lushan National Park (China, 1996, criteria (ii), (iii), (iv) and (vi)); and Mount Wutai (China, 2009, criteria (ii), (iii), (iv) and (vi)). These three World Heritage properties are places where Mahayana Buddhism has been practiced from ancient times to the present. They all reflect the interconnectedness of the religious buildings and their natural landscapes, between buildings of different religions and beliefs (Buddhism with Taoism and Confucianism, or Buddhism with Shintoism). reflecting the thinking and tradition of living in harmony with nature, and also reflecting the tradition of worshipping and promoting religious or sacred mountains. They also have had far-reaching influences. The key difference highlighted by the State Party is that these three comparators were not inscribed on the basis of criterion (v) because they do not show an interaction between humans and the environment. or the traditional use of land, forests, mountains, rivers, plains, caves, sea, and islands.

The only compared World Heritage property inscribed on the basis of criterion (v) (among other criteria) is the Champaner-Pavagadh Archaeological Park (India, 2004, criteria (iii), (iv), (v) and (vi)). The State Party argues that it shows fundamental differences in terms of location, setting, size, chronology, religion, and types of relics.

Thirty-two sites from the Tentative Lists were also selected for comparison based on their locations in the Asia or Asia-Pacific region, their proposed justifications being under (at least) criteria (iii), (v) and (vi), and their associations with Buddhism, or at least with a religion. The nominated property is said to differ from all of them in setting and characteristics, and only three were considered for closer comparison: the Cold Desert Cultural Landscape of India (India); the Scenic and historic area of Sacred Mountains and Lakes (China); and the Tulin-Guge Scenic and Historic Interest Areas (China). However, the differences between Tibetan and Truc Lam Buddhism and the harsh natural settings of these comparators led the State Party to dismiss them.

In serial nominations such as this, the rationale for the selection of the component parts needs to be set out in terms of comparing them with other similar sites and justifying the choices made. Additional information on the selection of the component parts supplied by the State Party in November 2024 indicated that the component parts were selected from hundreds of sites in Viet Nam that are related to the general theme of the nomination. Several screenings focused the search on sites registered as National Monuments or Special National Monuments, and/or containing National Treasures. This resulted in 200 sites representing, primarily, temples, shrines, pagodas, hermitages, stupas, mausoleums (some in ruins), and landscape features. These sites were then semiquantitatively evaluated according to six criteria: contribution to the proposed Outstanding Universal Value; authenticity; integrity; current status of management and protection; representativeness; and relevance for the cultural heritage narrative.

This detailed process resulted in the twenty proposed component parts that comprise the current nomination. In the additional information provided by the State Party in February 2025, in response to the ICOMOS interim report, a reduced selection of twelve component parts was suggested, excluding eight component parts that were considered similar to other ones or displayed more severe conservation and management challenges.

ICOMOS considers that the comparative analysis includes a wide range of compared properties, many of which have little in common with the nominated property. The very wide narrative and the diversity of attributes selected by the State Party to support the potential Outstanding Universal Value of the nominated property make it possible to discard all comparators by shifting the focus and identifying elements that are missing. While the State Party explained that the distinguishing aspect of Truc Lam art and architecture is a tendency towards less elaborate expressions, it would be important to highlight the distinctiveness of Truc Lam Buddhism, in comparison to other Buddhist sects in the region, in terms of its ideals, physical expressions, use of space, and application of the tradition of "active engagement".

ICOMOS does not consider that the comparative analysis justifies consideration of this property for the World Heritage List at this stage.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iii), (v) and (vi).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that a strategic alliance of the State, the religion, and the people from the mountainous Yen Tu region created a unique cultural tradition of global significance that shaped nationhood and fostered peace and security in the wider region. The nominated property is seen as an exceptional testimony to a cultural tradition that developed within the cradle of Truc Lam Buddhism and the homeland of the

Tran Dynasty. An alliance between Truc Lam adherents and the ruler of the Tran Dynasty united the Vietnamese nation, mobilising its forces and all its ethnic and religious groups to build an independent, sovereign Dai Viet nation, preserving peace and preventing war in Northeast and Southeast Asia during the 13th and 14th centuries. The State Party contends that the influence of the historic alliance of politics, religion, and society remains alive today throughout Viet Nam, and elsewhere in the world.

ICOMOS considers that archaeological remains and various monuments tell the story of the different stages of the development of Truc Lam Buddhism. However, the dimension relating to the formation of the sovereign Dai Viet nation is not sufficiently well connected to the rest of the plural narrative. While the narrative presented by the State Party covers both of these aspects, the attributes upon which the two dimensions of the narrative are based remain disconnected. In response to the ICOMOS interim report, the State Party reduced the number of component parts, but did not change the central narrative. ICOMOS suggests that the narrative as well as the series be focused on the development of Truc Lam Buddhism since, on the basis of the criteria for justification, the manifestations related to the establishment of the Dai Viet nation would normally have to be expressed in distinctive ways of building, spatial planning or urban patterns.

ICOMOS considers that this criterion is not demonstrated at this stage.

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that the deep understanding by the people of the Dai Viet kingdom and their respectful use of nature in Yen Tu is a remarkable example of human-environment interaction. In the 13th and 14th centuries, it became the "holy land" of Truc Lam Buddhism and a key area for the Tran Dynasty. As explained by the State Party, Truc Lam Buddhism emphasises a life lived in harmony with nature, based on a deep understanding of natural conditions and the orientation principles of *feng shui*. The bond between the landscape and humans persists today, according to the State Party, especially through the many sites of religious practice.

While ICOMOS appreciates the additional information provided by the State Party in February 2025 on this issue, it considers that the claim of an outstanding interaction between people and their environment remains unsubstantiated. The State Party indicates that the main expression of this interaction is the process of selecting sites for the construction of religious and other buildings in safe and beautiful locations that have the necessary resources. Furthermore, the application of *feng shui* and a deep understanding of the natural conditions

of the land are mentioned. Examples are provided that a site was located in a scenic location with favourable *feng shui*, or that a whole pagoda assemblage resembles the face of a dragon, according to *feng shui*. However, it is not sufficiently clear how these aspects influenced human behaviour, and how, in turn, they are expressed in the landscape. More importantly, it is not adequately demonstrated that this process of selecting advantageous sites for buildings and activities in the nominated property is outstanding in comparison to decision-making processes in any other sites.

ICOMOS considers that this criterion is not demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that the nominated property is organically associated with Truc Lam Buddhism, a unique Vietnamese Zen sect that unified different contemporary Buddhist schools and Zen sects while drawing on the ideologies of Taoism, Confucianism, and indigenous beliefs. Characterised by a spirit of self-reliance and self-reflection, it encourages its followers to "enjoy the Way in Life", "live in harmony with the mundane", and especially to have "active engagement" in the lives of people and the affairs of the country. Truc Lam Buddhism became a fundamental nation-building force, extending from its spiritual home in Yen Tu to the secular world and contributing significantly to every aspect of life during the Tran Dynasty, be it spiritual, social, economic or political, or matters of national security. The many intangible aspects attesting to the ideology and influence of Truc Lam Buddhism include scriptures, stories, poems, folklore, and legends, as well as rare woodblocks imprinted with Chinese-Nom script. The religious Yen Tu sites and the many festivals that are celebrated there continue to attract large numbers of pilgrims.

ICOMOS considers that the nominated property has a range of intangible attributes that relate to the development of Truc Lam Buddhism.

In the additional information supplied by the State Party in February 2025 in response to the ICOMOS interim report, a description of the wide spectrum of intangible heritage connected to the nominated property was presented, together with a detailed account of the processes of identification and official recognition of intangible heritage in the country. While the value of these elements for Viet Nam is obvious, it is not clear wherein the Outstanding Universal Value lies. Religions always (try to) influence the behaviour of the faithful in some way; it is not evident what makes this particular case stand out from others. It is stated that Truc Lam Buddhism helped to foster a strong nation, ensuring regional peace and cooperation. However, ICOMOS considers that this causal connection is not sufficiently well documented.

ICOMOS considers that this criterion is not demonstrated at this stage.

The property has been nominated as an organically evolved cultural landscape that illustrates the integration of people and the environment through the selection of beautiful and secure locations that are suitable in terms of landscape and *feng shui*; through the use of natural materials for construction and natural resources such as food, fuel, and medicine for living; and through people's intimate knowledge of the natural environment with regard to military strategy.

The claims for the interconnection between nature and the cultural elements lack sufficient evidence to identify the nominated property as an organically evolved cultural landscape. It is not sufficiently demonstrated how the process of selecting sites for the construction of religious buildings in safe and beautiful locations that have the necessary resources influenced human behaviour, or how the use of feng shui and a deep understanding of the natural conditions of the land and the use of natural materials for construction, can be seen as an exceptional example of an interconnected nature-culture relationship. In addition, it is problematic that a number of the component parts are very small in area and lack a significant associated landscape, which makes it difficult to see these discrete elements as forming a comprehensive cultural landscape. ICOMOS considers that the application of the cultural landscape category to the nominated property is not justified.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed at this stage.

ICOMOS considers that the nominated property does not meet criteria (iii) and (vi) at this stage, and that criterion (v) has not been demonstrated.

Integrity and authenticity

Integrity

The integrity of the nominated property is based on intact and archaeological remains of pagodas, temples, shrines, and other tangible and intangible heritage related to the Tran Dynasty during the 13th and 14th centuries and to Truc Lam Buddhism, a Zen sect unique to Viet Nam. As a serial nomination, consideration must also be given as to whether the component parts individually and collectively contain all the attributes necessary to express, in a substantial way, the potential Outstanding Universal Value of the nominated property as a whole, and how each component part contributes to that value. Integrity is furthermore a measure of the intactness of the attributes.

The State Party asserts that all the core values and characteristics of Truc Lam Buddhist culture are fully represented and clearly demonstrated within the nominated component parts. The proposed Outstanding Universal

Value is based on three key elements: Truc Lam Buddhism, the Tran Royal Family, and the Yen Tu Mountain Range. According to the State Party, these elements together formed the foundation of the Dai Viet nation.

ICOMOS considers that the component parts and the attributes they contain are not an entirely adequate basis for conveying the narrative that the State Party has chosen for the nomination. As previously stated, not all the attributes contribute to the same narrative. The nation-building dimension in particular is not sufficiently covered by the proposed component parts. In order to focus the narrative on a single theme with potential, as the development of Truc Lam Buddhism, it would be necessary to exclude those attributes that do not contribute directly to the potential Outstanding Universal Value. The stake-yards, for example, would appear to fall within this category.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and integrity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated at this stage.

Authenticity

The authenticity of the nominated property is based on how the attributes of the potential Outstanding Universal Value convey their value. Its authenticity should be evaluated in terms of attributes related to the forms and designs, materials and substance, uses and functions, locations and settings, traditions, spirit, and other forms of tangible and intangible heritage of the nominated property as a whole and for each component part.

According to the State Party, the authenticity of the nominated property is based on its cultural tradition, its interaction with the environment, and its ideology, beliefs, and role in society. Changes in the forms and designs of the buildings over time are considered to be part of the development process of the Truc Lam Zen sect and an important expression of the Dai Viet culture and civilisation through hundreds of years of history. In terms of the authenticity of materials, the State Party acknowledges that most of the standing Buddhist architectural monuments of the Tran Dynasty have been damaged, heavily modified, or rebuilt, and almost all the secular structures, such as the mausoleums, have also been altered, as compared to their original state. Most of the sites have key buildings that were constructed or reconstructed in the last three or four decades, and only very general justification for these reconstructions has been provided by the State Party in terms of how or whether the existing structures are based on evidence from the Tran Dynasty period. The State Party indicates that original structures, materials, and decoration have been used wherever possible in rebuilding and restorations.

The uses, functions, locations, settings, spirit, and traditions associated with the component parts have remained constant. Evidence of the authenticity of tangible attributes

is focused on archaeological excavations, with intangible attributes focused on Vietnamese annals, ancient religious documents, Buddhist poems and scriptures, epitaphs, ancient maps, and inscriptions, as well as oral sources, including chants, stories, and legends or rituals in festivals.

ICOMOS requested additional information about this issue in its interim report. The State Party replied that the renovation and reconstruction of royal temples and mausoleums, Truc Lam Buddhist pagodas, hermitages, and stupas were recorded in historical books such as the Complete Annals of Dai Viet, books on Truc Lam Buddhism such as the Thanh Dang Luc, or on stone steles. During the French colonial period, this documentation was continued by the École Française d'Extrême Orient. In the 20th century, especially after elements of the nominated property were recognised as National Monuments or Special National Monuments, the renovation and reconstruction of relics and their documentation were strictly regulated by the State Party, most recently in line with Decree No. 166/2018/ND-CP. It regulates the procedures for preparing, appraising, and approving relic renovation and reconstruction projects, highlighting the rule that relics can only be restored on the basis of historical documents and data gained from the field, without relying on assumptions. However, it is also stated that since most of the buildings are in large part made of wood, scientific restoration is often impossible.

ICOMOS considers that it is difficult to assess the conditions of authenticity for this nominated property. Many of the buildings cannot be considered authentic in terms of their forms and materials. However, the archaeological remains can be considered authentic, and there is a close link between the existing monuments and living religious traditions. This facilitates the continued uses and functions of the built elements.

Nevertheless, since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and authenticity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated at this stage.

In conclusion, ICOMOS considers that the conditions of integrity and of authenticity of the whole nominated series and of the individual component parts have not been met at this stage.

Boundaries

The boundaries of the nominated serial property are those stipulated as a "protection zone I" for cultural heritage under the Law on Cultural Heritage (2001, amended in 2009). They cover areas with the original constituents of relics. A "protection zone II" (equivalent to a World Heritage buffer zone) covers areas surrounding or adjacent to a protection zone I. The State Party emphasises that all component parts of the nominated serial property are within the boundaries of National Monuments or Special National

Monuments, with legal boundaries officially agreed and confirmed by local authorities.

The boundaries of component parts 1 to 17 are clearly delineated and based on an understanding of the site gained through research and archaeological excavations. In the additional information supplied by the State Party in February 2025, the number of component parts was reduced and one element eliminated from a relic cluster component part. No new maps were supplied to document these changes. For the Bach Dang River stake-yards (component parts 18 to 20), the boundaries are limited to three zones in the riverine landscape where wooden stakes have been discovered. It is not clear how these three component parts were selected, or if they adequately convey the values associated with the battlefield.

In some instances, the boundaries of the buffer zones align with those of national forests, nature reserves, special-use forests or protection forests, all of which are safeguarded by national and/or provincial laws, such as the Law on Forestry, the Law on Biodiversity, and the Law on Environmental Protection. In other cases, the buffer zones follow natural topographical features, such as mountain ridges, streams, and rivers.

The buffer zones are designed to ensure effective protection and coordination among the different component parts of the nominated property, safeguarding its potential Outstanding Universal Value, integrity, and authenticity. They also help to manage pressures from urban and rural development by providing clear boundaries for protection, thus enhancing the overall effectiveness of heritage management and conservation.

The State Party has indicated that in the case of the Thanh Mai Pagoda National Monument (component part 13), a new buffer zone is going to be defined, including a large surrounding area of special-use forest, protection forest, and production forest, totalling more than 450 hectares.

ICOMOS observes that all component parts have buffer zones, though some of them do not completely encircle the component part. In other cases, the boundaries of the buffer zones are very close to those of the component parts. This applies for example to component parts 1, 5, 9, 10, 11, 16, 17, and 19. In these cases, it is important to acknowledge that landscape protection zones, rice fields, and special forest zones surround most of these component parts and are effectively an extension of each designated protection zone II (buffer zone). Maps that show all these complementary protection zones have been submitted by the State Party as part of the additional information of November 2024.

The nomination dossier contains lists of inhabitants in different areas related to the nominated property, however, it is not clear how many of the people mentioned in the lists actually live in the nominated property or buffer zones. The State Party highlights that the population will be stable in the future.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that, at this stage, the comparative analysis does not justify consideration of the nominated property for the World Heritage List nor have any of the criteria been justified, though some may have the potential to be demonstrated if the narrative underpinning this nomination is made more coherent by focusing exclusively on Truc Lam Buddhism and its development. The conditions of integrity and authenticity of the whole nominated series and of the individual component parts have not been met at this stage. In order to reflect an adjusted narrative, the boundaries of the nominated property would need to be reconsidered.

4 Conservation measures and monitoring

Documentation

There are multiple reliable sources of information related to the component parts. Thorough interdisciplinary research and recording have been conducted over several decades for all component parts and are available at the site museums and the Management Board offices in each of the three provinces.

Comprehensive documentation of artefacts has also been conducted, including National Treasures displayed in provincial museums or the National History Museum in Hanoi. Additional information supplied by the State Party in November 2024 clarified that all the work related to archaeological surveys, excavations, and post-excavation work is guided by the regulation on archaeological exploration and excavation of the Ministry of Culture, Sports and Tourism (MOCST).

An archaeological research strategy is being developed under the guidance of experts from the Vietnam Archaeological Association and the Vietnam Institute of Archaeology. This strategy will form the basis for a systematic research plan that will outline future objectives, minimise the impact of excavation activities on the nominated property, and enhance the understanding of various aspects of the heritage.

A comprehensive inventory and research programme is in place since 2015. Current research objectives include the study of materials, conservation methods, restoration techniques (such as for bricks), construction methods, refinement of historical chronologies, and intangible cultural values associated with Truc Lam Buddhism, among other topics.

Surveys are underway to create a comprehensive archaeological map of the nominated property area, which will serve as the foundation for further research and facilitate the dissemination of the characteristics of the heritage both locally and internationally.

Research, particularly interdisciplinary work involving both national and international institutions, will be carried out by research organisations, universities, and independent scholars, in collaboration with relevant provincial departments such as the Department of Culture, Sports and Tourism (DOCST), the Department of Natural Resources and Environment, and the provincial Management Boards.

An annual inventory programme documenting intangible cultural heritage, particularly related to Truc Lam Buddhism and the Tran Dynasty, is conducted in collaboration with the DOCST, the provincial Management Boards, and research institutions across the three provinces. Additional information provided by the State Party in February 2025 indicates that inventory and research results are archived at national and provincial libraries, at the MOCST, and at specialised research institutions, and are transferred to local authorities for management, preservation, and promotion. They are publicised at conferences, seminars, and national and international journals, and are used in education and training programmes. The intangible heritage inventory database of the provinces of Quang Ninh, Hai Duong and Bac Giang is managed at the MOCST and the provincial DOCSTs. It is updated regularly and can be checked online.

Conservation measures

All the component parts have conservation and management plans. The plans outline a roadmap for maintenance and restoration based on thorough surveys and condition assessments and on required restoration interventions. The State Party indicates that future priorities will include enhancing conservation and restoration techniques for structures and sites.

There is collaboration with religious leaders to manage and protect the monuments, and to conduct regular surveys to assess the conservation status of the sites and identify any current damage or potential for future damage.

Monument protection projects have been ongoing for years, including significant restoration work at the Con Son-Kiep Bac Historic Relic Area (component parts 14 and 4) since the 1970s and at the Yen Tu Historic Relic and Scenic Area since the 1990s. These projects undergo professional evaluations by the Department of Cultural Heritage of the MOCST, as well as Approval Councils chaired by the MOCST. As per regulations, comprehensive surveys, including archaeological excavations, must be completed before proposing any restoration options.

Stone steles at the Con Son and Thanh Mai pagodas (component parts 14 and 13) are protected by roofs, with fences constructed to limit visitor disturbance. Some outdoor artefacts, such as the An Ky Sinh statue, the Buddha Nirvana statue, the Amitabha stone stele, and the Thien Mon stone stele (component part 9), will be given enhanced protection in the future. The State Party notes that some sites require improved conservation measures to address damage caused by weather, natural disasters, geological hazards, and human impact. However, no detailed information has been provided on the specific conservation procedures and materials that will be used. To

protect unexcavated archaeological remains, measures such as effective drainage, flood prevention, increased vegetation cover, and soil erosion control will be implemented.

All component parts have been subjected to archaeological excavation. In areas where there are standing buildings, only small test trenches have been excavated, and these have been backfilled after documentation. Some sites, such as the Thai Mieu Imperial Ancestral Shrine (component part 1) and the Thai Lang Mausoleum (component part 3) located on an island in a lake, have undergone extensive or complete excavations. The excavations have confirmed and validated oral traditions, folklore, legends, religious texts, stone inscriptions, historical records, maps, and other documentary sources. They also have uncovered several significant artefacts, all of which have been recorded and conserved, with many displayed in on-site museums.

The three Provincial People's Committees are responsible for overseeing all conservation and management activities across the nominated serial property, while the Management Boards are tasked with implementing heritage-related policies and regulations. The management system for the nominated property is expected to include a general conservation plan that the State Party indicates will adhere to the principle of minimal intervention and be consistent with international charters and UNESCO recommendations.

For archaeological remains preserved in their original state, the primary focus is on controlling environmental impacts and harmful agents, and on cleaning surfaces. Interventions will be flexible, based on thorough scientific preparation and effectiveness. Excavated artefacts are stored at Management Board offices or provincial museums. Some artefacts recognised as National Treasures remain at the relic sites, with measures such as soft barriers and signboards in place to minimise visitor contact

For architectural works, the elaboration of a systematic conservation and restoration process is planned.

After being inscribed on the UNESCO Asia-Pacific Memory of the World regional Register in 2012. in 2012, the Vinh Nghiem Pagoda woodblocks were placed in specially designed preservation chambers and display cabinets installed for optimal care. There is a security system with surveillance cameras, fire alarms, and on-site fire extinguishers, according to additional information supplied by the State Party in February 2025. The Bo Da Pagoda woodblocks, named a National Treasure in 2017, are stored in a similar way. There are plans to create a microclimate environment system to preserve the woodblocks, though recent research indicates that the traditional approach (without the installation of a central air conditioning system) may be more sustainable. Additionally, the craft of carving, repairing, and preserving woodblocks has been revived by the provinces of Bac Giang and Hai Duong. ICOMOS considers that the

measures taken concerning potential fire hazard are adequate, but that further efforts could be made to reduce the risk of theft.

Monitoring

The three provincial Management Boards are responsible for day-to-day management actions that include monitoring, among other tasks. The monitoring activities are executed within the framework provided by the overarching management plan of the nominated property, and the Management Boards are assisted in the monitoring activities, where appropriate, by professional experts and agencies (for example, the Vietnam Institute of Archaeology and the Vietnam Institute of Geosciences and Mineral Resources). The State Party highlights the importance of monitoring different aspects according to the type of heritage in question (archaeological sites, historical monuments, etc.).

Taking into account the additional information submitted by the State Party in November 2024, ICOMOS considers that there is a clear understanding of the monitoring process. However, there are several aspects that should be revised and improved. Monitoring results are concentrated in annual or five-year reports on the state of conservation of the National Monuments and Special National Monuments, but there is no clear indication that the information is centrally stored in a database that would allow future research on the manner and rates of change at the nominated property. ICOMOS recognises that this decentralised ad hoc approach to monitoring has allowed the component parts to be maintained in a good state of conservation until now. ICOMOS considers, however, that the monitoring system would be improved by having key indicators that are more specific and measured in shorter cycles, generating not only qualitative data but quantitative data as well. The results should be centrally processed and stored for future consultation in a database accessible to managers and relevant authorities.

ICOMOS considers that the documentation of the nominated property, the conservation measures, and the monitoring processes are all well advanced. The State Party is encouraged to finalise the archaeological research strategy and a general conservation plan that pays particular attention to the authenticity of the heritage attributes. The monitoring system should be improved by identifying clear key indicators, measured over shorter intervals, to generate quantitative data alongside the qualitative information. The results should be centrally processed and stored in a database for future reference and consultation.

5 Protection and management

Legal protection

The nominated property, which is owned by the State Party, is strictly protected under the provisions of the relevant laws and regulations of Viet Nam. These laws include the Law on Cultural Heritage No. 21/2001/QH10 dated 29 June 2001; Law No. 32/2009/QH12 dated 18 June 2009 amending and supplementing several articles of the 2001 Law on Cultural Heritage; and Governmental Decree No. 98/2010/ND-CP dated 21 September 2010 detailing the implementation of several articles of these laws. Governmental decisions specifying the areas and boundaries of protection zones and landscape protection areas; the Law on Environmental Protection (2020); the Law on Forestry (2017); and the Law on Tourism (2017) are also applicable.

All of the component parts are designated as National Monuments or Special National Monuments, and thus have the highest available legal protection.

Heritage Impact Assessments are not legally compulsory but are being implemented to a certain extent as part of Environmental Impact Assessments under the Law on Environmental Protection. The Law on Cultural Heritage is being revised to incorporate this requirement in the future. This revision is expected to be approved by the National Assembly in 2025.

Intangible cultural heritage is also strictly protected, either at the provincial level, or when certified by the Ministry of Culture, Sports and Tourism (MOCST) as National Intangible Cultural Heritage. There are several examples of this in the nominated property such as festivals, commemorative ceremonies, religious engravings, and scriptures. Some relics in the nominated property such as the Golden Box at the Ngoa Van Pagoda (component part 10), the Buddha-King Statue at the Hoa Yen Pagoda Relic Cluster (component part 9), and the woodblocks at the Bo Da Pagoda (component part 15) are recognised by law as National Treasures. The State Party supplied additional information in November 2024 on legal protections that cover landscape and biodiversity values beyond the protection zones I and II. These include National Parks, nature reserves, special-use forests, species-habitat conservation areas, and watershed forests, water resources or rice fields.

ICOMOS considers that the State Party has a robust legal system to protect the nominated property and that the laws are effectively implemented on the ground to ensure protection.

Management system

The management system of the nominated property is based on an effective management and professional guidance framework consisting of four levels: State level (MOCST); provincial level (Provincial People's Committees); city/town/district level (District People's Committees); and enforcement agencies which directly manage the monuments (provincial and site Management

Boards). At all levels, the main agencies are supported by many departments that coordinate and provide technical guidance (the provincial Departments of Culture, Sports and Tourism, the Bureau of Culture and Information, the Bureau of Land Management, etc.). The nominated property is governed under the jurisdiction of the People's Committees of the three provinces and managed overall by the Management Board of the nominated property, which coordinates the three provincial governments and their agencies.

A total of 246 persons are employed at the individual Management Boards. No information has been provided concerning their specific activities in relation to the nominated property. Research, expert advice, and training are available from many national institutes and universities. The main organisations are the Vietnam Archaeological Association, Vietnam Institute of Archaeology, Vietnam Institute of Geosciences and Mineral Resources, and the Vietnam Institute of Monuments Preservation.

All management activities are guided by an overarching management plan for the nominated property that is legally binding. It offers a framework to guide management agencies and stakeholders in decision-making, ensuring the achievement of management goals, aligning expectations, and safeguarding common interests. It aims to mitigate the impact of existing and potential pressures and threats. The plan covers all objectives and actions related to the protection, management, sustainable use. monitoring, and promotion of the proposed values and attributes of the nominated property. In addition to the management plan, there exist six master plans for the Relic Areas, one of which would appear to be in preparation since 2020. The relevant agencies coordinate with each other to ensure consistency between the master plans and the overarching management plan.

There is a strong commitment from the State Party and provincial authorities for protection and financial support. In November 2024, the State Party supplied additional information on funding, indicating that for more than two decades significant funds have been made available to ensure the preservation of the component parts. Funding for investment in monuments comes from the budgets of the central and local governments, from the Buddhist Sangha, and from socialisation capital and other lawful capital sources approved by the State Party.

Financial resources are allocated to individual Management Boards who are responsible for applying the funds to management actions as appropriate.

Visitor management

The twenty component parts of the nominated property attract more than one million visitors annually. Some of the component parts receive considerably more visitors than others. Most of the visitors are religious pilgrims who participate in special events or festivals at the various sites.

At the larger monuments and sites, paved paths and trails are provided and some offer the use of electric cars. The

Hoa Yen Pagoda Relic Cluster and Ngoa Van Pagoda (component parts 9 and 10) have cable car systems to transport large numbers of people with minimal environmental impacts. The stations are placed to avoid visibility from the shrines. Some monuments and sites offer accommodation in the form of hotels and private homestays.

Several new infrastructures are planned to be installed in the future to accommodate growing numbers of visitors. In all cases, the State Party highlights the importance it places on designing visitor services that harmonise as much as possible with the surrounding landscape.

Currently, there are three provincial museums and the National History Museum in Hanoi where artefacts, photographs, pictures, and texts related to the Tran Dynasty and Truc Lam Buddhism are displayed. Furthermore, the major monuments have exhibitions and museums (e.g., component parts 2, 8, 12, 14 and 16).

The Management Board of the nominated property has developed a plan to upgrade the existing information centres by expanding and enhancing their infrastructure and facilities, improving the information being delivered as well as the storage, display, and exhibition methods, and promoting heritage values related to other fields such as geology-geomorphology, biodiversity, and landscape, based on data obtained from the latest inventories and research programmes. This plan is set to be implemented in the period 2021-2030 and will be subject to revision.

A house and an outdoor museum will be built at the Thai Mieu Imperial Ancestral Shrine (component part 1) to present what is considered to be the earliest and most complete royal ancestral shrine monument in Viet Nam. Other on-site museums are also in the planning stage.

A comprehensive, consistent, and unified system of interpretation panels, signboards, guidebooks, pamphlets and leaflets, information centres, museums, and social networks is in preparation, parts of which are already being implemented at individual component parts, within the framework of the promotional programmes for National Monuments and Special National Monuments. It is planned to organise a contest to design a common logo for the nominated property as well as to design typical products. The component parts will create their own logos based on the common logo. Yen Tu cultural heritage will be promoted not only at the sites themselves, but at airports and national highways.

Currently, research is being carried out regarding the nature of tourism at the nominated property, which includes a study on carrying capacity. With the majority of visitors coming to the nominated property for religious and spiritual purposes, often concentrated in festivals at the beginning of the year, the main concern is potential short-term overloading. In the additional information provided in November 2024, the State Party indicated that the Management Boards have experience in handling any

overcrowding by controlling the number of entrance tickets, or regulating visiting hours.

ICOMOS considers that the State Party should prepare for an increase in visitor numbers in the future, and should therefore consolidate the different activities and projections into a formal tourism management plan. Planned developments such as on-site museums and outdoor exhibitions should be subjected to Heritage Impact Assessments before any irreversible decisions are made.

Community involvement

According to the State Party, the nomination was developed with the full support of stakeholders and Indigenous communities. The nomination process involved extensive consultation with local authorities, communities, businesses, and other key stakeholders. Local authorities officially approved the boundaries of the Special National Monuments and the component parts of the nominated serial property, and actively participated in the development of conservation master plans and other initiatives. Major tourism operators were also informed of the plans for the future management of the nominated property. Additionally, a significant number of local people are employed in various management and service roles within the nominated property, including guiding, ticket sales, maintenance, security, logistics, food provision, and emergency first aid and healthcare.

The State Party emphasises the importance of a collaborative approach to management. It stresses that all local people have the opportunity to engage in the management of the nominated property and benefit from it. While local authorities appear to be well integrated into the nomination and management processes, there is limited evidence of the involvement of local communities beyond the general dissemination of information. Looking ahead, the State Party plans to develop a heritage education programme focused on the local communities. Particular attention will be given to those working within local government, with the goal of raising awareness about the heritage they manage and fostering a sense of responsibility for its protection.

The State Party notes that Indigenous peoples living in and around the nominated component parts are dispersed and small in number, most having been integrated into the broader population. As a result, they were reportedly not consulted or engaged separately during the nomination process. At the same time, the State Party recognises the importance of indigenous knowledge, including medicinal practices, traditional costumes, crafts, music, and dance, as important aspects of the intangible cultural heritage.

ICOMOS recognises that the State Party has involved – and plans to continue involving – local communities, particularly local authorities, in the management process. However, it would be useful to clearly identify which local and Indigenous communities were engaged during the nomination process from initial contact through to the final stages, including the length and timeline of consultations. More detailed information about histories, languages,

cultural practices, and traditions of Indigenous communities would provide essential context for their involvement in the nomination process and clarify their role(s) within the nominated property. Actions that affect Indigenous communities must be based on their free, prior and informed consent.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the nominated property is effectively protected and managed. The legal framework will be strengthened by incorporating a Heritage Impact Assessment mechanism into the Law on Cultural Heritage. Within the management structure, particular attention needs to be paid to tourism management, especially in anticipation of an increase in the number of visitors. Greater community involvement beyond the local authorities should be encouraged, including Indigenous peoples.

6 Conclusion

ICOMOS considers that the primary distinctive feature of the Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes serial nomination lies in the historical significance of Truc Lam Buddhism, its emergence, and its profound influence, particularly in relation to the Tran Dynasty. This religion has led to the creation of a rich tradition expressed through a variety of religious buildings, artefacts, and ongoing cultural practices.

ICOMOS observes that the nomination is underpinned by a strong legal framework and that the management structure is operational. ICOMOS also appreciates the work carried out by the State Party to produce informative additional information.

ICOMOS considers that there are several major issues with the nomination, most notably a heritage narrative that is too inclusive, and a lack of information and analysis concerning the physical expressions of Truc Lam Buddhism. Nevertheless, ICOMOS considers that a reconfigured nomination may have some potential to justify Outstanding Universal Value, possibly under criteria (iii) and (vi), provided that these major issues can be resolved by the State Party.

A nomination focused on the development of Truc Lam Buddhism in the Yen Tu sacred mountain landscape would have greater potential to demonstrate Outstanding Universal Value than the currently proposed narrative. It would be important to better highlight the distinctiveness of Truc Lam Buddhism in its physical expressions, its modifications in the use of space, and its application of "active engagement" as part of a cultural tradition (criterion (iii)). The human-nature interaction expressed in, for example, the placement of the buildings and the intangible heritage (festivals, pilgrimages, etc.) described in the nomination — by themselves difficult to define as

outstanding – could be used as supporting evidence for a cultural tradition centred on Truc Lam Buddhism (criterion (vi)).

Some elements, such as the stake-yards, are not closely linked to the central themes, while other aspects, such as traditional land uses and interactions with the environment (criterion (v)), have not been adequately explored.

ICOMOS considers that there is not enough information on the interaction between people and the environment to justify the application of the landscape category to the nominated property. Furthermore, a number of the component parts are very small in area and lack a significant associated landscape.

Other aspects requiring attention include, among others, establishing a robust monitoring system with quantitative indicators, finalising the general conservation plan with a focus on authenticity, determining the carrying capacity of the nominated property, and creating more robust visitor management tools. More active participation from local communities and Indigenous peoples in the ongoing management of the nominated property should also be encouraged.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the examination of the nomination of the Yen Tu-Vinh Nghiem-Con Son, Kiep Bac Complex of Monuments and Landscapes, Viet Nam, to the World Heritage List be **deferred** in order to allow the State Party, with the advice of ICOMOS and the World Heritage Centre, if requested, to:

- Reconsider the nomination with a view to focusing the narrative on the development of Truc Lam Buddhism, founded to embody the idea of a secluded life without isolation, which promoted harmony between religious and secular lives and fostered the birth of a nation, and its physical expressions in the Yen Tu sacred mountain landscape,
- Highlight the distinctiveness of Truc Lam Buddhism, in comparison to other Buddhist sects in the region, in terms of its ideals, physical expressions, use of space, and application of the tradition of "active engagement",
- Envisage extending the boundaries of the revised nominated property to fully encompass an area of the Yen Tu sacred mountain landscape which includes the important structures, sites, and landscapes that reflect the origin and development of Truc Lam Buddhism,
- Complete and implement on an urgent basis a systematic conservation and restoration process for the revised nominated property, taking into account the need to maintain the authenticity of the buildings,

structures, archaeological sites, and other relevant elements;

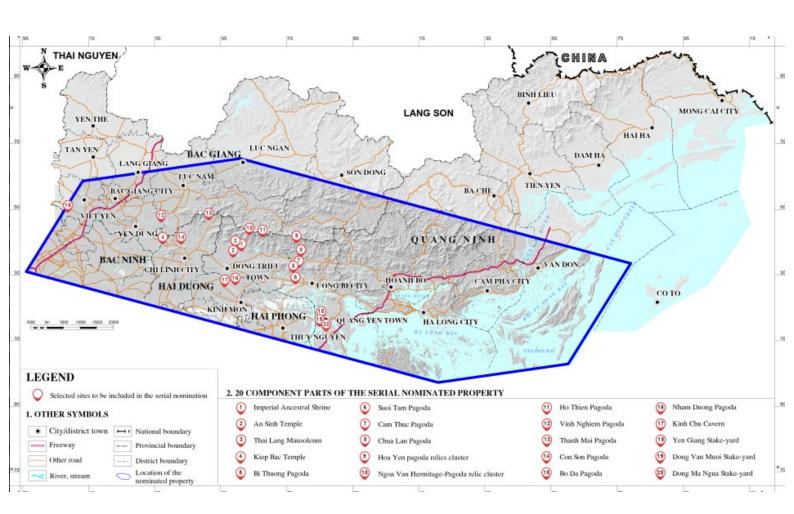
Any revised nomination should be visited by a mission on-

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Preparing a comprehensive archaeological map of the Yen Tu area that will serve as the foundation for further research and facilitate the dissemination of Yen Tu heritage's characteristics both locally and internationally,
- b) Approving and making operational all master plans for the Relic Areas, if not already the case,
- Finalising the integration of a Heritage Impact Assessment mechanism in the Law on Cultural Heritage,
- d) Including a general conservation plan in the management system of the nominated property that adheres to the principle of minimal intervention and is consistent with international charters and UNESCO recommendations,
- e) Enhancing the conservation and restoration techniques for structures and sites that are set out in the framework of the conservation and management plans,
- f) Improving the security measures currently in place, especially for the woodblocks,
- g) Improving the monitoring system by identifying key indicators that are more specific and measured over shorter cycles, that generate both qualitative and quantitative data, and whose results are processed centrally and stored in a database accessible to the relevant authorities,
- Planning for a future increase in the number of visitors, and consolidating the different visitor activities and projections in a formal tourism management plan,
- Creating visitor services that do not affect the heritage values of the nominated property and that harmonise with the surrounding landscape, including any planned on-site museums, and improving the existing infrastructures and facilities, as well as the information being delivered based on data obtained from the latest inventories and research programmes,
- j) Acquiring more detailed information about indigenous knowledge on intangible heritage in order to provide an essential context for the involvement of Indigenous Peoples in the

- nomination process and to clarify their role(s) within the nominated property,
- k) Ensuring adequate consultations, free, prior and informed consent, and equitable and effective participation of Indigenous Peoples in the management of the nominated property,
- Increasing efforts to manage village growth and transportation infrastructure that may affect the nominated property, and addressing domestic wastewater and agricultural fertilizer run-off that is affecting rivers,
- m) Preventing sand mining in the upstream area of the buffer zones, as well as illegal coal mining, preferably by offering alternative sustainable livelihoods to people involved in the activity.



Map showing the location of the nominated component parts

III Cultural properties

A Africa

New nomination Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination Nomination deferred by a previous session of the World Heritage Committee

Megaliths of Carnac and of the Shores of Morbihan

(France)

No 1725

1 Basic information

Official name as proposed by the State Party

Megaliths of Carnac and of the Shores of Morbihan Location

Morbihan

Brittany

France

Brief description

This nominated serial property of four component parts is spread between the Quiberon Bay and the Gulf of Morbihan in Brittany, Western France. It comprises a high density of megalithic structures erected successively during the Neolithic period (approx. 5000-2300 BCE) taking into consideration the distinctive geomorphology of the area. The monumental stone structures of different types. constructed in relation to each other and to specific topographical features - both relief and hydrographycomplemented by a rich repertoire of engravings and associated precious objects, testify to the occupation of the European Atlantic Coast by societies that developed a complex relationship to their natural environment.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of four sites.

In terms of the Operational Guidelines for the Implementation of the World Heritage Convention (2024), paragraph 47, it has also been nominated as a cultural landscape.

Included in the Tentative List

20 September 1996 as "Sites mégalithiques de Carnac"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 6 to 11 October 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024requesting further information about description of the proposed cultural landscape, nomination strategy - serial nomination, attributes.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the nomination strategy - cultural landscape, protection, management and coordination, risks.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated serial property consists of four component parts which encompass a high density of megalithic structures showcasing Neolithic monumental architecture which was erected successively over more than two millennia (from approximately 5000 to 2300 BCE) in the western part of present-day France, in Brittany, between the Quiberon peninsula and the Gulf of Morbihan. A variety of monumental stone structures, such as menhirs, standing stone (or stelae) alignments, stone circles, cairns, and tombs of different types covered by tumuli or simple mounds, were constructed in specific locations, in relation to the topographical features and the spatial and visual interconnections between the megaliths themselves. A rich repertoire of parietal art engraved on stone slabs complemented this megalithic architecture.

Component part 1: Carnac Plateau - Le Gouyanzeur Basin

This component part is marked by the continuum of standing stone alignments that extends between the Etel Ria and the River Crac'h, some found in association with burial mounds and dolmens.

Component part 2: Quiberon peninsula - Kerboulevin

This component part includes the largest grouping of submerged standing stones, found at Kerbourgnec. The area also yielded a considerable number of jadeite axes documented in association with megalithic structures.

Component part 3: Three rivers confluence

This component part demonstrates the interrelation between megalithic tombs and stone alignments. Centred on the estuary at the mouth of rivers Auray, Vannes and Noyalo, whose valleys are today largely submerged, it encloses megalithic structures with a rich repertoire of engravings.

Component part 4: Bono and Auray rivers confluence

This component part represents the area thought to have been a transition and communication channel towards the Gulf of Morbihan. It features dolmens and cist graves with mounds associated with standing stones situated in relation to the rivers.

Within the nominated property, over 12,000 standing stones in 150 alignments have been documented. Though some stones today stand isolated, archaeological works have confirmed existence of complex ensembles, of which they were part, that have not survived.

The phenomenon of standing stones is found in the nominated property physically, structurally, spatially, chronologically, and symbolically associated with funerary architecture.

Some 158 engraved stones with a variety of representations of real objects, animals, as well as abstract forms have been documented in the nominated property. Besides their decorative purpose, the engravings were possibly part of a symbolic iconographic system. The engraved tomb walls are largely the result of earlier engraved standing stones being reused in the later funerary constructions.

Additional megalithic structures, associated with the nominated property, are located in the buffer zone.

The area of the four component parts totals 19,598 ha, with a buffer zone totalling 98,029 ha. Each component part preserves a variety of megalithic structures and includes evidence of parietal art. Each offers different landscape characteristics.

Megalithic architecture has been progressively erected throughout the Neolithic period following a system of values and taking into account the distinct geomorphology of the area consisting of small watercourses and fertile micro-valleys facing the sea. At this stage of research, the reasons why these structures were built, the logic behind their placement in the landscape, or the intended connections between them and the surrounding environment are not well understood. Most of the

structures were likely visible from afar and the intervisibility between them must have played a role in their positioning. The resulting symbolic architectural and archaeological ensemble testifies to the specific relationship of the Neolithic communities to their coastal environment, and their evolving social and spiritual concepts. As new structures were added to the old ones, and many old structures or parts thereof reused in later periods, the nominated megalithic ensemble was created "by aggregation" over the millennia.

While the logistical details of extracting the stones, transporting them (often over long distances), and erecting them are largely unknown at present, the technical skill required to erect the megalithic structures is undeniable, as the choice to use material that was not readily available nearby reflects the effort and intention of the creators.

Deposits of precious objects made of rare materials from distant places, and in particular jadeite axes from the Italian Alps and variscite beads from the Iberian Peninsula, found at different locations within the nominated property in association with the stone structures and the engravings, add to the symbolism of the arrangement of the megaliths. Found buried or submerged in specific places, they denote some sort of code that governed their orientation. These objects are currently stored in museums and storage facilities, but the sites where they were found are documented and included within the boundaries of the nominated property.

The nominated property has undergone substantial changes over the millennia. Rising sea levels related to climate change have been gradually submerging the territory since 13000 BCE. Around 4500 BCE, the shoreline stabilised which enabled populations to settle in the region, develop societies and economies linked to the maritime environment. The submerged parts of the nominated property provide tangible evidence to the progressive change of sea levels, which might have played a role in the perception of the passage of time and understanding of the notions of life and death by the people.

The Neolithisation of the area started around the 5th millennium BCE. It is difficult to decipher the influence of the early Neolithic societies on the origins of megalithic culture. According to the State Party, two conceptions of the world might have played a role - on the one hand, the expanding influence of Bandkeramik (Linear Pottery culture) communities coming from the interior of the continent (Central Europe), across northern France; on the other hand, the possible encounters of the local Indigenous populations with the Mediterranean communities who had a strong connection to the sea and maritime movement. A new local reinterpretation of these two supposedly contrasting worldviews is said to have developed in the region through their adaptation to a different environmental reality. A distinct way of life and a new perception of the landscape could have resulted from this.

Agriculture was introduced shortly after 5000 BCE. At the same time, the megaliths began to appear, first on the Atlantic Coast, then throughout northern Europe to the Mediterranean Sea. At the end of the 4th millennium, the region must have experienced socio-economic changes which might have led to changes in the types of the megalithic structures being built.

The megalithic phenomenon in Brittany ceased with the end of the Neolithic period. Subsequently, monuments were often reused, or new funerary structures inserted into the older ones. New forms of tombs developed in the Bronze Age. The monumentalism of the Neolithic was gone. Revived partly in the Iron Age, megalithism of that period features specifically Gallic stelae. During Antiquity, two urban poles developed: Vannes and Locmariaquer. In the Middle Ages, myths and folk tales emerged around megaliths and many monuments were Christianised. The division of land into plots at that time resulted in megalithic structures being reused in large quantity for perimeter walls or pavements. In the 19th century, seaside tourism increased in the Breton countryside which gradually changed the landscape. The territory is now composed of small, densely-populated municipalities, some of which are highly urbanised. As a result, the legibility of the once well-structured megalithic landscape has been disrupted.

In the additional information provided in November 2024, the State Party explained that the advent of the Neolithic period on the European Atlantic Coast in the5th millennium BCE resulted from a complex interaction of different parameters generated by the combination of cultural traits characteristic of hunter-gatherer societies and early agricultural societies. The change took place through two currents of influence at the ideological, technological, and cultural levels. Subsequent changes in types of megaliths could be linked to the evolution of political and spiritual conceptions of the societies.

The State Party further clarified that the component parts complement each other, having once been part of one coherent landscape. The megalithic structures should be seen as a network rather than singular elements. At the same time, the State Party admitted that there is insufficient evidence to track the development of this network and confirm the contemporaneity of the structures. It is also difficult to establish with certainty viewsheds and intervisibility in the Neolithic period due to a lack of information on the vegetation cover.

ICOMOS considers that the State Party has presented the natural environment of the nominated property as the landscape setting within which the stone structures, as an architectural and archaeological ensemble, were inserted, with some characteristic connections to the morphology of the terrain pinpointed when possible. The greater logic behind the relationship between the megaliths and the surrounding landscape is admittedly not understood at this stage. The natural environment is said to structure and give coherence to the megalithic ensemble but the way the territory was transformed through the construction of this network is unclear.

ICOMOS further considers that while it is possible that Morbihan was a zone of contact between the Central European cultural stream and the Mediterranean influence, it seems impossible at this stage to assert, on the basis of archaeological observations, that these contacts led to a change in the way the local populations perceived the territory during the Neolithic period.

State of conservation

The megaliths of Morbihan became a subject of scholarly studies early in the 19th century. In 1825, the first systematic inventory of the stones was published and in 1880, a detailed documentation of the structures accompanied by photographs followed. Scientific archaeological excavations of the megalithic sites have been undertaken since the second half of the 19th century and continue to this day. While new structures keep being found, many of the identified sites have never been excavated.

Many megalithic stones were removed from their original locations and reused as early as prehistoric times. In the 19th century, the destruction of the structures often accompanied the development of new infrastructures. As a result, the megalithic ensemble has only been partially preserved to this day, and few structures survived in an intact state. Natural erosion has also led to the partial loss of integrity of many megaliths. The Second World War left a particular mark on the nominated property due to the construction of the Atlantic Wall, which had a major impact on some of the structures, in particular for the *Er Gadoueric* dolmen in Erdeven and the dolmen at the *pointe Men er Bellec* in Saint-Philibert (both in the buffer zone), as well as the cairn of *Petit Mont* in Arzon (component part 3).

Three major periods can be distinguished in the process of restoration of the megaliths: 1880-1890 — the State acquired a substantial number of megalithic sites from private owners and conserved them;1900-1930—numerous megalithic structures were excavated, restored and declared national heritage; 1980s-1990s — many megalithic tombs were made accessible to the public upon restoration. Some restoration interventions from the 1980s are today considered inappropriate or do not allow to differentiate between the original material and the reconstruction (as in the cairn of *Gavrinis*, *Table-des-Marchands* dolmen and cairn of *Petit Mont*, in component part 3).

The first inventory of engravings was published in 1927. In 1970-1980, further discoveries were made. Between 1986-1994, an investigation programme was developed at the site of the *Grand Menhir Brisé* and the *Er Grah* tumulus (component part 3). And in 2011-2014, studies were undertaken at the cairn of *Gavrinis* (component part 3). Five engraved stones have been removed from the sites and are now kept in museums or archaeological repositories: the stelae of *Mané er Hroëck*; the *Kerpenhir* stelae; the Luffang stelae; sill slab S12 from the cairn of *Gavrinis*; the *Mané Kerioned* stelae.

Precious objects (deposits) found in association with the megaliths and the parietal art are stored in local museums (Carnac Prehistory Museum, Museum of History and Archaeology of Vannes, National Archaeological Museum) and abroad (British Museum). The earliest discovery of these artefacts was made in 1808 – this assemblage has been dispersed. The most recent one is from 2007.Polished axes have been the subject of a research programme since the late 1990s-early 2000s.

The landscape setting of the ensemble of megaliths has greatly changed since prehistory. Urbanisation and afforestation affected the intervisibility between the elements of the nominated property. Work to improve the perception of the sites within the landscape is ongoing.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is satisfactory, though many structures suffered considerable damage over the millennia. The landscape setting has changed radically, and the intervisibility between the megaliths is partially lost.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are environmental and anthropogenic.

Rise in sea levels due to climate change have submerged some megalithic monuments. The mapping of these structures requires further investigation. The impact of shellfish farming on submerged megalithic heritage remains poorly known. It is impossible to fully manage the risks related to sea-level rise and the resulting changes in the coastline. To address climate change, the "Climate and Resilience" Act was passed in 2021with the goal of reducing greenhouse gas emissions. The area of the nominated property is also covered by two Territorial Climate-Air-Energy plans (PCAET).

Urbanisation and tourism have had a growing negative impact on the nominated property since the 19th century, when infrastructure development (roads and railways) and changes in land use resulted not only in the destruction of individual megalithic structures but led to the transformation of the landscape. Urban growth modified the original setting, thus inhibiting the understanding of the megaliths as a cohesive network interacting with the coastal geomorphology. Presently, approximately twenty-seven per cent of the megalithic structures are located in an urban environment. Approximately nineteen per cent are found on cultivated land, thus at risk of being destroyed or removed.

Urban sprawl is controlled by legislation – Coastline Act and "Climate and Resilience" Act – and planning documents.

The development of seaside tourism has threatened the integrity of the nominated property. The associated afforestation of the coastlines has led to the partial loss of legibility of the landscape and intervisibility between the architecture and topographic features. Currently, tourism management is oriented towards greater distribution of pressures across the sites. Vegetation pruning, thinning, felling, and controlled natural regeneration operations have improved the perception of several sites. These actions are ongoing.

The most recent threat to the nominated property is related to the implementation of new wind farms and photovoltaic power plants. The risks associated with the project are managed through the application of the APER Law in urban planning documents, which provides additional guarantees concerning the preservation of the integrity of the nominated property. The project will impact the viewsheds as the wind farms will be visible from the nominated property, particularly from many strategic megalithic locations, but this is considered marginal.

The development of a new museum and visitor centre buildings is expected to start in 2024 in Arzon and 2025Carnac.Heritage Impact Assessments have been conducted for both projects, with favourable results. Archaeological surveys have been carried out for the site in Arzon, and surveys are planned for the development in Carnac as well.

ICOMOS considers that the state of conservation is satisfactory despite fragility of many megalithic structures and that factors affecting the nominated property are under control.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The megalithic ensemble set in the coastal landscape of the Gulf of Morbihan and Quiberon Bay bears witness to the existence of a centre of power and prosperity in the Neolithic period and to the creative genius of the Neolithic populations and their technological skilfulness. The remarkable density and diversity of the structures preserved to date, combined with a rich iconographic repertoire of engravings and a collection of precious objects of distant origins, prove the existence of a complex system of a symbolic nature that structured the landscape in relation to specific topographic features.
- The megalithic structures influenced developments in architecture and monumental art at the time of the Neolithic agropastoral societies at the European scale
- The network of structures was created by aggregation over approximately2,000 years based on a value

system and taking into consideration the distinctive geomorphology of the region. The nominated cultural landscape, with its strong coastal and riparian character, testifies to the specific living environment and way of life of the Neolithic communities, as well as their political and spiritual conceptions.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: standing stones, tombs, parietal art, prestigious objects of distant origin deposited in relation to megalithic structures, and morphology of the coastal landscape.

ICOMOS considers that the proposed justification for inscription has been developed around the outstanding nature of the ensemble of megalithic structures implanted intentionally in the coastal environment of the Gulf of Morbihan according to a symbolic code, rather than around the exceptionality of a cultural landscape. While the close relationship of the prehistoric monuments to the coastal landscape of rias, bays and estuaries is clear, these elements of the natural environment are presented as features organising the megalithic network rather than constituting together with it a cultural landscape of a symbolic nature transformed through human intervention.

Accordingly, in the interim report, ICOMOS advised the State Party that seeing the nominated serial property as an architectural and archaeological ensemble would be more viable nomination strategy at this stage, one that allowed to justify the proposed Outstanding Universal Value.

Nonetheless, understanding the importance of the landscape dimension in the nominated property and recognising that each component part represents a piece of what used to be a cultural landscape during the Neolithic period – the complementarity of these pieces being indicated by a single buffer zone – ICOMOS considers that using the landscape approach as a management tool, i.e., taking into consideration the importance of the geomorphology of the territory and the relation of the structures to the specific topographical features and to each other, including the intervisibility between these elements, should be supported.

In response, the State Party agreed in February 2025 with the recommendation of ICOMOS.

Comparative analysis

The comparative analysis has been developed around the qualitative assessment of the nominated property on the grounds of three parameters: structural characteristics; social, economic, and cultural characteristics; chronological characteristics. These parameters have been considered within typological, chronological-regional and thematic frameworks. The megalithic structures have been considered as types of archaeological heritage, with the associated cultural landscapes and rock art sites. The geo-cultural framework

has not been restricted. Accordingly, properties throughout the world inscribed on the World Heritage List, sites included in the Tentative Lists of States Parties, as well as other properties have been compared to the nominated property. Chronologically, the Mesolithic and Neolithic periods were considered, taking into account that the phenomenon of the Neolithic was experienced differently in different parts of the world. Within the thematic framework, the nominated property has been compared to monumental stone and earthen structures of symbolic or funerary nature.

The compared properties were divided into two groups based on their chronology:(1) representing the Neolithic in the 5th and the 4th millennia BCE; (2) more recent ones. Within these selected properties, the megalithic structures of the European Atlantic seaboard represent the earliest known megaliths and share the most common characteristics with the Morbihan megalithic phenomenon. The following properties can be considered the closest comparators to the nominated property: Stonehenge, Avebury and Associated Sites (United Kingdom of Great Britain and Northern Ireland, 1986, criteria (i), (ii), (iii)); Brú na Bóinne - Archaeological Ensemble of the Bend of the Boyne (Ireland, 1993, criteria (i), (iii), (iv));Heart of Neolithic Orkney (United Kingdom of Great Britain and Northern Ireland, 1999, criteria (i), (ii), (iii), (iv)); Antequera Dolmens Site (Spain, 2016, criteria (i), (iii), (iv)); The Passage Tomb Landscape of County Sligo (Ireland, Tentative List); and Mousa, Old Scatness and Jarlshof: the Zenith of Iron Age Shetland (United Kingdom of Great Britain and Northern Ireland, Tentative

ICOMOS considers that the State Party prepared an exhaustive comparative analysis based on the proposed criteria and attributes of the proposed Outstanding Universal Value, combined with relevant parameters and an adequate timeframe. ICOMOS concurs with the State Party on the selected closest comparators and the analysis done for the purpose of demonstrating the exceptionality of the nominated property within its geocultural region.

However, ICOMOS also observes that the landscape dimension of the nominated property has not been fully explored through the comparative analysis, which focuses on the megalithic structures as an architectural ensemble implanted within a particular natural environment. Accordingly, the presented comparative analysis does not allow to confirm exceptionality of the nominated property as a cultural landscape but rather demonstrates its exceptionality as an architectural and archaeological ensemble.

In response to the ICOMOS interim report, the State Party confirmed that current knowledge of the Neolithic landscape does not allow to propose the landscape dimension as the parameter to develop a relevant comparative analysis.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List as an architectural and archaeological ensemble.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (i), (ii) and (iv).

Criterion (i): represent a masterpiece of human creative genius;

This criterion is justified by the State Party on the grounds that the nominated property constitutes an architectural and artistic work that is exceptional in its scope and creativity. The way that the monumental structures have been implanted in the coastal landscape in relation to specific topographical features testifies to the creative genius of the Neolithic populations and their technological skilfulness. A rich repertoire of engravings and deposited objects bears evidence of the artistic mastery of the creators. The iconographic repertoire of parietal art reaches its peak for the European Neolithic in the nominated property.

ICOMOS considers that the scale, density, and diversity of the preserved megalithic structures is a testament to the technological sophistication and organisation of the Neolithic communities which enabled them to extract, transport (sometimes over long distances) and handle the large amount of stone and earth needed to achieve their goals. The parietal art does not appear to be unique or exceptional in terms of its age or mastery on the scale of Europe, as similar non-representational engravings have been found in other regions of Western Europe. However, representational art is rarely documented in the megalithic contexts and the respective engravings found in the nominated property represent one of the earliest examples of this type in Western Europe. Density of the engravings is also considered exceptional.

ICOMOS considers that this criterion is demonstrated.

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the nominated property influenced developments in architecture and monumental art at the time of the Neolithic agropastoral societies at the European scale. The influence of the artistic production of the Neolithic populations inhabiting the nominated property for some 2,000 years, and the transfer of knowledge across Europe, especially along the Atlantic Coast, can be seen in the later megalithic productions in other parts of the continent, including in present-day Switzerland, Italy and possibly also Portugal and Spain.

ICOMOS considers that the available dating of the sites suggests that the megalithic monuments of this region include some of the oldest ones in Western Europe, potentially influencing the development of megalithic traditions in other areas. However, it is not excluded that research advances on megaliths in other regions will one day introduce other possible interpretations of the diffusion and chronology of megalithism in Western Europe. Moreover, while there is evidence in the form of material connections for contacts (direct or indirect) between Brittany and Iberia during the period in question, and that northern France (including Brittany) remains a likely source of inspiration for the earliest megalithic monuments in other regions, there is no concrete evidence of the unilateral flow of influences between the nominated property and other documented sites. The number and size of the early megalithic monuments of the Carnac region indicates that it might have been a centre of regional and probably supra-regional importance, which would suggest significant impact on other areas of Western Europe in the development of Neolithic monuments. Yet, other sites also testify to the longdistance exchanges in a similar manner and in the same period.

ICOMOS further considers that scholars still have limited understanding of the Neolithic populations, their lifestyles, and systems of social organisation. Further research including excavation should improve the state of knowledge about domestic spaces of the people who produced megalithic architecture and their daily activities and social practices, providing more precise evidence of their influence on or from the European continent.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

This criterion is justified by the State Party on the grounds that the architectural ensemble represented by the nominated property is an example of an outstanding symbolic landscape created by aggregation during the entire Neolithic period. It demonstrates a new complex relation that humans developed with their environment and a cosmology which differs from that of the earlier hunter-gatherer groups. Exhibiting novel monumental architecture and associated artistic expressions (in iconography and production of rare objects, including the emblematic polished axe), the nominated property testifies to socio-economic and cultural changes in Western Europe which mark a significant stage in human history.

ICOMOS considers that the monumental stone structures of the Carnac region and Gulf of Morbihan are an outstanding example of megalithic architecture illustrating a significant stage in human history. The architectural and archaeological ensemble represents the transition to a new stage of human interaction with the environment, involving the construction of monuments of considerable size with specific orientation towards topographical features, visual interconnections and in relation to the geomorphology of the area, resulting in the creation of a

complex, symbolic space testifying to over 2,000 years of human activity in this territory. Megalithism in the Morbihan region embodies the ideological transformations that have accompanied the process of neolithisation. While the perception of the spatial organisation of the megaliths in the landscape is today only partially preserved and its logic not well understood, the megalithic structures, seen together as an ensemble rather than individually, allow to appreciate the complexity and totality of the megalithic project.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the varied typologies of megalithic structures and the associated parietal art are the attributes of the nominated property. The positioning of the monumental architecture in the landscape was intentional and of importance, therefore geomorphology of the area and specific topographical features should be considered attributes of the nominated property as well, alongside the visual connections between the structural elements of the proposed ensemble.

However, ICOMOS does not concur with the identification of the deposited objects and structures which are no longer physically present due to their destruction but known from archival documentation as attributes. Artefacts that have been alienated from the nominated property and structures which have lost their integrity cannot be said to convey the proposed Outstanding Universal Value. ICOMOS agrees that the documentation of places where they used to be implanted and the associated knowledge contribute to the understanding of the nominated property. Therefore, it is the location itself that can be said to participate in the expression of significance of the nominated property rather than the objects/destroyed structures themselves.

ICOMOS considers that the nominated property meets criteria (i) and (iv), but that criterion (ii) has not been demonstrated, and that the serial approach is justified. ICOMOS considers that the application of the cultural landscape category to the nominated property is not justified.

Integrity and authenticity

Integrity

The integrity of the nominated serial property is based on the inclusion of all megalithic structures and features of the natural environment, the interplay of which made the architectural ensemble appear as a cohesive network.

Urbanisation has radically changed the character of the landscape setting of the nominated property since the Neolithic period, disturbing the visual interrelations between the preserved megalithic structures and specific topographical features. The fragmentation of the nominated property into four component parts results from these transformations which interrupted the spatial continuity of the stone architecture. Each component part represents

geomorphologically distinctive section of a broader megalithic landscape, preserving together what remains of a once coherent network.

The proposed boundaries have been delineated to encompass not only the preserved megalithic structures but also, where possible and appropriate, the topographical features and elements of the broader natural landscape in relation to which the monumental architecture was oriented, or which constituted the culturally meaningful setting for the structures. The buffer zone, which includes several sites and monuments that support the nominated property, ties the elements together, symbolically indicating the connections between the component parts.

Some attributes of the nominated property were modified as early as the Neolithic period, when the stones were removed and reused in other structures. Natural erosion, colluvium, and rising sea levels, combined with anthropogenic damage, have resulted in the loss of some of the attributes of the nominated property. Nevertheless, the organisation of the megalithic ensemble is still partially legible, even if the logic behind it is not fully understood at this stage.

The integrity of the nominated property remains vulnerable due to pressures from urbanisation, seaside tourism, afforestation practices, and climate change. The measures implemented by the State Party provide a response to these key threats.

The conservation of the sites and monuments is currently carried out in a way to ensure maximum integrity of the structures. However, the monuments present very different states depending on the period during which they were previously treated.

ICOMOS considers that the nominated property has suffered from strong erosion and degradation since the Neolithic period which explains the vulnerability of the structures. Nonetheless, the integrity of the whole nominated series as well as the integrity of each individual component parts have been demonstrated.

Authenticity

The authenticity of the nominated property is based on the form and design as well as location and setting of the megalithic ensemble with the associated parietal art, articulated through a series of four component parts.

The antiquity and significance of the megalithic structures have been explored through over two centuries of antiquarian and archaeological research and investigation. The resulting scientific documentation is extensive

The structures themselves are relatively well preserved though many have suffered the effects of the passage of time since they were created. Limited reconstruction has been undertaken in a minority of cases. Archaeological investigations confirm the existence of a larger number of standing stones in the past than is currently known. A substantial number of monuments have been reorganised as early as the Neolithic period, with the creators of the megaliths rearranging older structures or transforming them into other forms. The same applies to the engraved slabs, which were reused as walls in tombs.

The natural setting of the stone structures has undergone radical changes: structurally, due to the rise in sea levels; ecologically, as the forest cover has changed and the biotope became more homogeneous; and in terms of character and function, which is mostly the result of urbanisation. The spatial organisation of the megaliths remains partially legible but the intervisibility of elements, which was once essential in the organisation of the ensemble, is preserved today only in certain locations. Contemporary landscapes have diluted the cohesiveness of the megalithic network.

Despite these challenges, ICOMOS considers that the authenticity of the whole nominated series as well as the authenticity of each of the component parts have been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met.

Boundaries

The area of the nominated property is densely populated, however the exact number of inhabitants is not provided.

The boundaries of the component parts were delineated based on the location of the megalithic structures in regards to the geomorphology of the area, the interrelations between the structures, as well as the density and diversity of the megaliths. They largely follow geomorphological features, particularly the spatial elements of the waterbodies (e.g., coastline or thalwegs) and of the landforms (e.g., ridges or valleys). They occasionally overlap with municipal boundaries and follow cadastral limits.

The boundaries correspond to the full extent of the known megalithic phenomenon in the region, including areas that might carry future archaeological potential, and consider intervisibility between the structures and topographical features. The four component parts include groups of structures that are both visible and invisible (submerged or buried) which have been integrated into the natural landscape, linked to one another in structural, functional, cultural, or symbolical ways.

A single buffer zone connects the component parts which collectively represent a system or network. The buffer zone comprises elements of the natural environment that support the nominated property (i.e., the Quiberon Bay, the rias and the Gulf of Morbihan) and the structural elements that physically or semantically are related to it (e.g., valleys opening onto the nominated property, ridge lines). It follows the geomorphological characteristics of the terrain, both on land and underwater, integrating now-

submerged areas of the coastal landscape that are thought to have constituted its boundaries during the Neolithic. The buffer zone also includes a number of megalithic structures thathave lost their integrity or whose relationship with the topography of the area and other structures is not well understood.

As research continues, new megalithic sites may be discovered within the nominated property or its buffer zone, enriching the understanding of the placement of megaliths and possibly requiring changes to the boundaries.

ICOMOS considers that due to the fragmentation of the nominated property, the coastal landscape within which the megaliths were implanted is not fully included within the proposed boundaries, which may lead to the loss of intervisibility between major monumental structures located in different component parts. The State Party should ensure adequate maintenance and management of the landscape dimension, to address not only the impact of development projects on the intervisibility of elements within one component part but also between other component parts.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies consideration of the property for the World Heritage List. The nominated property meets criteria (i) and (iv), but criterion (ii) has not been demonstrated. The serial approach is justified, and the selection of component parts is appropriate. However, ICOMOS considers that the cultural landscape category is not justified. The justification for inscription and the proposed criteria demonstrate rather the exceptional qualities of the nominated property as an architectural and archaeological ensemble implanted into the natural environmental of the European Atlantic Coast, which served as its canvas. ICOMOS further considers that the conditions of integrity and authenticity of the whole series and of the individual component parts have been met.

4 Conservation measures and monitoring

Documentation

The megalithic structures have been inventoried since the 19th century. The old documentation is kept by multiple institutions in France and Europe. The most recent update of the inventory was completed in 2023. The database is managed by the association *Paysages de mégalithes*. It includes the assessment of the state of conservation of all the sites and monuments within the nominated property, done in 2011-2018, which represents a reference tool for monitoring purposes, future conservation, and management of the nominated property.

A corpus of engravings found in the nominated property was prepared in 2016-2023. Parietalart is currently being

recorded using advanced techniques (digital photogrammetry).

In 2020-2021 a landscape study was completed, which constitutes the basis for the preparation of the landscape plan with recommendations for the preservation and valorisation of the landscape dimension of the nominated property.

Conservation measures

All megalithic structures listed or registered as historical monuments, together with their immediate setting, benefit from regular maintenance. In 2004, the Regional Directorate of Cultural Affairs (DRAC)launched a programmed maintenance project of the megalithic structures and their associated landscapes. The initiative has been since supported by the intercommunal municipality *Auray Quiberon Terre Atlantique* (AQTA). The intercommunal municipality *Golfe du Morbihan – Vannes agglomération* (GMVa) is currently considering the programme as well. For private owners of the megalithic sites and monuments a maintenance guide has been developed.

Conservation interventions are undertaken on an individual basis by different stakeholders responsible for the upkeep of the megalithic structures, with *Paysages de mégalithes* acting as facilitator and coordinator of works. The current approach advocates for non-intervention except in cases of danger of damage. Conservation-restoration interventions are generally undertaken taking into consideration the legal status of the structures, the urgency of the response, and the need to maintain or develop access to the site or monument for the public.

ICOMOS considers that basic maintenance and required conservation interventions should be planned and undertaken on all the structures, irrespective of whether or not the larger public has or will have access to them.

Monitoring

The indicators developed by the State Party aim to monitor the state of conservation of the archaeological remains in terms of their physical integrity, stability (observation of soil erosion), and conditions of the stone surface. In terms of legibility of the structures in the landscape, the state of the vegetation cover is monitored. Several monitoring tools (e.g., photographic observations) are available to assess the changes of the landscape, in particular of the coastline.

A standardised monitoring programme for the entire nominated property is being developed by the State Party based on the assessment of the state of conservation. It is planned to be operational by 2027.

Given that multiple institutions at different levels are responsible for monitoring the different attributes of the nominated property, and that the monitoring data is held by numerous actors, ICOMOS considers that the identification of the supervisory body is unclear. It is also unclear how the

system is applied to structures in hard-to-access locations (submerged sites, monuments on private property).

ICOMOS considers that the conservation approach of minimal intervention is adequate but, when required, interventions should not be limited only to the structures to which larger public has access.

ICOMOS considers that it would be advisable that the monitoring system be adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

Currently, sixty-three per cent of the territory of the nominated property and twenty-four percent of the buffer zone are legally protected under different legal documents, namely the Heritage Code, Environment Code, and Town Planning Code.

Under the Heritage Code, forty-one per cent of the megalithic structures have been listed or registered as historical monuments and are protected along with their immediate surroundings – traditionally, a 500-meterradiusor a perimeter established based on the setting according to 2016 LCAP Law (demarcated perimeter of the surrounding area).

Additional protection of the nominated property is ensured through the label of Outstanding Heritage Site (SPR) of Carnac. The municipalities of Quiberon and Belz have initiated the process of developing a SPR in 2022. Locmariaquer may follow.

About fifteen per cent of the territory of the nominated property falls within the presumption zones of archaeological prescription (ZPPA), where preventive archaeological work may be required before granting development permits. The sites and monuments located outside ZPPA have already been excavated. The ZPPAs within the nominated property were updated in 2023.

Less than seven per cent of the sites and monuments of the nominated property are located in zones where construction is still permitted.

Under the Environment Code, several sectors of the nominated property are protected on account of their natural values as listed and registered natural sites and monuments. These sectors comprise thirty-eight per cent of the nominated area.

The nominated property, and part of the buffer zone, are protected under the Coastline Act, which restricts construction on the coastline. Part of the nominated property is currently submerged and thus within the maritime public domain. The submerged megalithic structures do not benefit from any protection at this stage.

In these areas, shellfish farming activities are the subject of specific zoning.

In 2021, the State Party introduced the "Climate and Resilience" Act which sets an objective of zero net artificialisation to be achieved by 2050.

Besides the abovementioned legal protections, other tools of control apply to specific sections of the nominated property and include the label "Le Grand site de France Dunes Sauvages" and protection through the Regional Nature Park (PNR) of the Gulf of Morbihan.

Besides these protective measures at the national level, there are multiple planification tools in place at the local level

The nominated property and the buffer zone extend over the territory of twenty-eight municipalities integrated into two intercommunal municipalities – Golfe du Morbihan – Vannes agglomération (GMVa) and Auray Quiberon Terre Atlantique (AQTA). The municipalities are equipped with Local Urban Plans (PLU), while planning and development at the supra-municipal level is done through Territorial Coherence Schemes (SCoT). These are considered as the principal management tools through which the management of the nominated property will be eventually implemented. The SCoTs and the PLUs comply with the Coastline Act regulations. Several PLUs already include specific zoning dedicated to the protection of megalithic structures of the nominated property and the coastline.

A reference book (cahier de référence Mégalithes et Patrimoine mondial) will provide comprehensive guidelines for the protection, conservation and presentation of the nominated property. It will ensure coherence of the different protection instruments and management tools, and will include guidelines in relation to the preservation and valorisation of the landscape dimension of the nominated property. The first version of this document is expected by 2025.

In the additional information sent in February 2025, the State Party explained that the SCoT of GMVa is being reviewed since 2023. Once accepted by the State authorities, the relevant elements of the reference book will be presented for integration into this SCoT before its final approval, anticipated in 2026-2027. The SCoT of AQTA has been under review since 2024. Approval of the revised version, which shall include the pertinent elements of the reference book, is projected for 2029. The PLUs of the municipalities will be revised in line with the relevant SCoTs.

The State Party further informed that in the next three years, the Regional Directorate of Cultural Affairs (DRAC)should embark on a new campaign to register as historical monuments the megaliths that remain unprotected. Depending on the progress of research and/or the risks to the integrity of the individual sites or

monuments, ad hoc protections under this designation may be pursued in the meantime.

ICOMOS considers that the protection of the nominated property is ensured through a mosaic of laws, regulations, and controls. However, at this stage, the nominated property is not fully covered by these different instruments, and a number of megalithic sites and monuments remain unprotected. While the State Party actively seeks to expand the protection, with forty new sites and monuments registered as historical monuments in 2022, it is unclear to ICOMOS whether the intention is to eventually list or register all of the megalithic structures.

ICOMOS further considers that the main challenge in implementing the proposed system of protection is its complexity; the varied laws and regulations targeting different elements of the nominated property and the surrounding natural environment, not necessarily focusing on the attributes. Coordination between the different institutions responsible for the protection of the nominated property to ensure a coherent application of the multiple protection tools will be crucial to safeguard efficiently the megaliths and their landscape setting.

Management system

About a quarter of the megalithic structures included in the nominated property are publicly owned, while others are privately owned.

The State institutions responsible for the protection and management of the nominated property at the national level are the DRAC, the Regional Directorate for the Environment, Planning and Housing (DREAL), and the Regional Directorate for Nutrition, Agriculture and Forestry (DRAAF).

At the department level, the Departmental Architecture and Heritage Unit (UDAP) works under authority of the DRAC, while the Directorate for Territories and the Sea (DDTM) cooperates with the DREAL.

The State Party has identified private sites and monuments whose acquisition would be necessary but considers that only few of those should be made accessible to public.

The governance system of the nominated property has been developed around two institutions: a Steering Committee (COPIL) and *Paysages de mégalithes*. The Steering Committee is the decision-making body comprising representatives of State institutions, local authorities, and managers of sites, all under the authority of the Prefect of the department of Morbihan. A Technical Committee (COTECH) has been established as an operational body of COPIL dedicated to coordination and implementation of the management plan. *Paysages de mégalithes* is an association which plays a coordinating role. It comprises all types of stakeholders involved in the management of the megalithic sites and monuments within the nominated property. The association

foreshadows the definitive management body of the nominated property.

The management plan was prepared by *Paysages de mégalithes* in collaboration with all relevant stakeholders and local communities. The future management of the nominated property is envisioned in a similar manner, focused on partnership. A Charter of Commitments was signed by all stakeholders in 2023and the plan is being implemented since 2024. The management plan will be legally binding upon inscription of the nominated property on the World Heritage List. The plan identifies priority strategic themes, to ensure the long-term preservation of the proposed Outstanding Universal Value in the long term, and details operational actions over a period of five years. The plan includes stipulations in regard to climate change mitigation.

IUCN welcomes that the environmental integrity of riparian and littoral habitats as well as research on biodiversity is covered in the management plan. The site management tries to balance the conservation of the megaliths whilst guaranteeing biodiversity conservation.

The major risks affecting the area of the nominated property are included in the Risks Register of the Department of Morbihan (DDRM), which stipulates prevention measures that can be implemented. The register is updated every five years. The latest revision dates back to 2020. Additionally, some municipalities are covered by a Risk Prevention Plan (PPR) whose purpose is to delimit areas directly or indirectly exposed to a certain risk and to regulate land uses accordingly.

In the additional information sent in February 2025, the State Party clarified that *Paysages de mégalithes* will be responsible for the management of the nominated property upon inscription; the status of the association will change from an entity supporting the nomination process to an exclusive management organ. The work of the association is framed by regulations pertaining to the Heritage Code and, generally, is done by agreement. The State Party also informed that no provision for the creation of a disaster risk management plan specific to the nominated property has been made, since the existing DDRM and the management plan which integrates response to the identified risks were considered sufficient.

ICOMOS considers that in the proposed configuration of the nominated property, the sustainability of the role and mission carried out by *Paysages de mégalithes* in unifying the management system appears essential. The State Party should ensure that the association has at its disposal the necessary management and control tools as well as adequate capacity and competencies to effectively manage the nominated property.

Visitor management

The department of Morbihan through the Tourism Development Agency (ADT)is preparing its tourism development strategy in relation to the existing regional tourism plan for Brittany and the local plans of tourist destinations. The focus of the State Party in developing tourism around the nominated property will be along two lines: the organisation of visitor flow in a functional manner across the nominated property (while protecting vulnerable sites and monuments), and the interpretation related to the proposed Outstanding Universal Value in order to view the nominated property as a network within a specific historical context. A communication and promotion plan will be developed to harmonise the information presented to the public. Information panels will help the visitors to understand the territorial network within each component part and the nominated property as a whole.

The State Party does not aim to open all the sites and monuments to the public. A selected number of them has been the subject of a series of site and monument development studies launched in 2015, aimed at valorising the nominated property through interventions designed to enhance the legibility of the megalithic structures in relation to the landscape. Visitor statistics currently only concern the few most famous sites. Others have uncontrolled access (about half of all sites and monuments) or are inaccessible due to property rights or state of conservation of the structures. Monitoring indicators for tourist visits are being developed and studies on the impact of visitor traffic and the carrying capacity of individual sites and monuments are planned for 2024-2027.

There are four visitor centres – one in component part 1, and three in component part 3 – as well as the Carnac Prehistory Museum in component part 1, within the area of the nominated property. Another museum (Museum of History and Archaeology) is located in Vannes, in the buffer zone. The State Party plans to modernise and expand the museum in Carnac (starting in 2025) and build a new interpretation centre at *Petit Mont* in Arzon (starting in 2024). The museum in Vannes will undergo a transformation as well.

ICOMOS considers that information regarding substantial restoration interventions and reconstructions of the elements of the nominated property should be highlighted in the interpretation and presentation of the megalithic structures. The distinction between the preserved archaeological material and the materials and restoration arrangements, as well as reinstatements (even though implemented based on scientific interpretation) should be made clearly understandable to the public.

Community involvement

The public has been included in the preparation of the nomination dossier as well as the management plan. Through *Paysages de mégalithes*, the State Party envisages involving all types of stakeholders and owners in the management of the nominated property. Given that most of the megalithic structures are privately owned, it is essential to inform the public and raise awareness. A programme is currently being developed.

While it is well understood that the State Party has organised a vast public information outreach, it remains

unclear to ICOMOS if all private owners of megalithic structures that form part of the nominated ensemble have individually consented to the process.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated serial property is adequate but not inclusive, as the current protective mechanisms do not cover the entire area of the nominated property to ensure control of the developmental pressures, and not all the individual megalithic sites and monuments are legally protected at the national level. The proposed management system needs to be finalised but appears to be well-conceived. Its effectiveness will depend on the capacity and viability of Paysages de mégalithes as the managing body. The State Party should ensure that the association has at its disposal the necessary management and control tools as well as adequate capacity and competencies to effectively manage the nominated property.

6 Conclusion

The Megaliths of Carnac and of the Shores of Morbihan preserve a megalithic ensemble of remarkable density and variety constructed during the Neolithic period (approx. 5000-2300 BCE), taking into consideration the distinctive geomorphology of the coastal and riparian landscape of present-day Brittany in France.

ICOMOS considers that the proposed Outstanding Universal Value has been demonstrated according to criteria (i) and (iv) but that criterion (ii) has not been justified. The conditions of integrity and authenticity of the whole series and of the individual component parts have been met.

ICOMOS also considers that the serial approach is justified and the selection of component parts is relevant to the proposed Outstanding Universal Value.

However, ICOMOS considers that the nomination of the property as a cultural landscape cannot be supported. The proposed justification for inscription has been developed around the outstanding nature of the network of megalithic structures implanted intentionally in the coastal environment of the Gulf of Morbihan, rather than the exceptionality of a cultural landscape. The natural environment appears as the canvas for the stone structures, presented as an architectural and archaeological ensemble. The landscape dimension has not been fully explored through the comparative analysis either.

Nonetheless, ICOMOS acknowledges the role the natural environment played in structuring the megalithic architecture, providing coherence to the megalithic network, and therefore considers that the nominated property should be seen as an architectural and

archaeological ensemble, managed by the State Party through a landscape approach.

The legal protection is complex, and the measures implemented adequately control the key developmental and environmental pressures. However, not all the individual megalithic sites and monuments are legally protected at the national level at this stage. The proposed management system appears to be well-conceived. It will be important to ensure that *Paysages de mégalithes* has at its disposal the necessary management and control tools as well as adequate capacity and competencies to effectively manage the nominated property.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Megaliths of Carnac and of the Shores of Morbihan, France, be inscribed on the World Heritage List on the basis of **criteria** (i) and (iv).

Recommended Statement of Outstanding Universal Value

Brief synthesis

Located in Brittany, in the west of France, in the area that spreads between the Quiberon peninsula and the Gulf of Morbihan, this serial property composed of four component parts comprises a high density of megalithic structures that showcase Neolithic monumental architecture erected successively over more than two millennia (from approximately 5000 to 2300 BCE) in relation to the specific topographical features of the area – both relief and hydrography.

A variety of monumental stone structures, such as menhirs, standing stone (or stelae) alignments, stone circles (cromlechs), cairns, and funerary architecture of different types – such as passage tombs (dolmens) or cist graves – with tumuli or simple mounds, were constructed in specific locations, the intervisibility between them playing a role in their positioning.

The property preserves also a rich repertoire of parietal art engraved on stone slabs with representations of objects, animals, as well as abstract forms, all of which constitute a symbolic iconographic programme that must have been executed according to a predefined code. Although it is not yet possible to explain with certainty the reasons for erecting these structures, the logic of their implantation in the landscape, and the intended connections between them and the surrounding environment, this megalithic ensemble indicates a symbolic perception of the surrounding coastal and riparian landscape by the Neolithic populations that once inhabited this part of the European Atlantic Coast.

The associated deposits of precious objects made of rare materials of distant places found buried in particular

places of the landscape, contribute to the understanding of the symbolic nature of the megalithic ensemble.

Criterion (i): By reason of their scale, density and diversity, the Megaliths of Carnac and of the Shores of Morbihan represent an exceptional testament to the technological sophistication and skilfulness of the Neolithic communities, which enabled them to extract, transport and handle monumental stones and earth to create a complex symbolic space that reveals a specific relationship of the people to their living environment. A rich repertoire of engravings of remarkable density includes representational art which is rarely documented in the megalithic contexts and constitutes one of the earliest examples of this type in Western Europe.

Criterion (iv): The Megaliths of Carnac and of the Shores of Morbihan, spread over a vast area, are an outstanding example of an architectural ensemble that represents the transition to a new way of human interaction with the environment, involving the construction of monumental structures according to a specific orientation towards topographical features, visual interconnections and in relation to the geomorphology of the area. The megalithism of the Morbihan region testifies to over 2,000 years of human activity in this territory and marks a significant stage in the human history of ideological transformations that accompanied the process of neolithisation of Western Europe.

Integrity

All component parts contribute to the Outstanding Universal Value, as they complement each other, having once been part of one coherent cultural landscape. The property encompasses the preserved megalithic structures and elements of the natural environment in relation to which the monumental architecture was constructed, oriented or which constituted the culturally meaningful setting for these structures. The megaliths and the accompanying parietal art are relatively well preserved though many have suffered the effects of the passage of time since their creation. Natural erosion, colluvium, and rise in sea levels, combined with the anthropogenic activity, including dismantling and reuse of the megalithic structures, have impacted the wholeness and integrity of some monuments, or led to their complete disappearance. The integrity of the property remains vulnerable due to developmental pressures, seaside tourism, afforestation practices, and climate change. While the perception of the spatial organisation of the megaliths in the landscape is today only partially preserved and its logic not well understood, the megalithic structures, seen together as an ensemble rather than individually, allow to appreciate the complexity of the megalithic project. Authenticity

The preserved ensemble of monumental structures comprising the property provides an insight into the megalithic phenomenon of the Neolithic period, even if archaeological research has confirmed that the original megalithic network included more structures. In spite of a certain amount of destruction and rearrangement of the

stone architecture, the thorough documentation and scientific knowledge accumulated to date have ensured that the property retains a sufficient level of authenticity. Reconstructions represent a limited number of cases, and minimal intervention is practiced as a conservation approach. Although the natural setting of the megaliths has changed substantially – structurally, ecologically, and in terms of character and function – the spatial organisation of the structures in the landscape remains partly legible, while intervisibility between them and significant topographical features are preserved in certain locations.

Protection and management requirements

The property is protected through numerous regulations under three French key legal documents - Heritage Code, Environment Code, and Town Planning Code. Forty-one per cent of megalithic structures are protected together with their immediate surroundings as listed or registered historical monuments. Additional protection is ensured through the designation of the Outstanding Heritage Site (SPR) of Carnac. The submerged megalithic structures remain unprotected, but the development of the coastline is legally controlled. Several sectors of the property benefit from the protection on account of their natural values. Multiple planification tools are also in place at the local level to control development, especially Local Urban Plans (PLUs, municipal level) and Territorial Coherence Schemes (SCoTs, supra-municipal level). The latter are the principal management tools through which the management of the property will be eventually implemented.

About a quarter of the megalithic structures in the property is in public ownership. Others are privately-owned.

At the national level, the Regional Directorate of Cultural Affairs (DRAC), the Regional Directorate for the Environment, Planning and Housing (DREAL), and the Regional Directorate for Nutrition, Agriculture and Forestry (DRAAF) are responsible for the protection and management of the property, together with their counterparts at the departmental level. At the local level, multiple local authorities, public and private entities and individuals oversee the maintenance and management of the property.

The governance system of the property includes a Steering Committee (COPIL) as the decision-making body, and a Technical Committee (COTECH) as its operational counterpart, while the association *Paysages de mégalithes*, composed of all types of stakeholders involved in the management of the megalithic sites and monuments, plays a coordinating role. The future management is envisaged in a partnership-focused way, the association becoming the ultimate management body of the property. The management plan has been prepared collaboratively by the association *Paysages de mégalithes* and is being implemented.

This scheme aims to secure knowledge, preservation and protection of the property and its component parts, as well

as communication about it with a view to its collective appropriation by all stakeholders and visitors.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Pursuing further the legal protection of the monuments and sites of the property that are not yet protected,
- Ensuring adequate capacity and competence within the association *Paysages de mégalithes*, and putting at its disposal the necessary management and control tools to implement the management plan,
- Finalising the monitoring programme for the property, as well as the communication and promotion plan to harmonise the narrative presented to the public,
- d) Finalising the reference book (cahier de référence Mégalithes et Patrimoine mondial) and submitting it to the World Heritage Centre.



Map showing the boundaries of the nominated component parts

The Palaces of King Ludwig II of Bavaria (Germany) No 1726

1 Basic information

Official name as proposed by the State Party

The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee – From Dreams to Reality

Location

Neuschwanstein Castle Government district of Swabia District of Ostallgäu Free State of Bavaria

Linderhof Palace Government district of Upper Bavaria District of Garmisch-Partenkirchen Free State of Bavaria

King's House on Schachen Government district of Upper Bavaria District of Garmisch-Partenkirchen Free State of Bavaria

Herrenchiemsee New Palace Government district of Upper Bavaria District of Rosenheim Free State of Bavaria

Germany

Brief description

Four lavish and architecturally eclectic palace complexes located in the alpine region of Bavaria, Germany, were created according to the romantic vision and under the meticulous supervision of King Ludwig II of Bavaria during his reign from 1864 to 1886. Neuschwanstein Castle, Linderhof Palace, the King's House on Schachen, and Herrenchiemsee New Palace are all carefully sited in landscapes of high natural and aesthetic qualities. They were designed and built as personal places of seclusion and as conduits for conjuring imaginary travels. Being conceived in the age of historicism and eclecticism, they made full use of the stylistic trends and technical possibilities of the era. Inspirations were derived from, among others, Wartburg Castle, the Palace of Versailles and its gardens, German fairy tales, and Richard Wagner's operas. Today managed as museums, these iconic structures were opened to visitors shortly after the king's death in 1886.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of a *group of buildings*.

Included in the Tentative List

15 January 2015 as "Dreams in Stone – the palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof and Herrenchiemsee"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 2 to 7 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 10 October 2024 requesting further information on the nominated property's description, boundaries, justification for inscription, selection of component parts, protection, management, interpretation, and presentation.

Additional information was received from the State Party on 15 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the justification for inscription, description of component parts, legal protection, management, and local communities.

Additional information was received from the State Party on 27 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property is composed of four component parts located in the Free State of Bavaria, Germany, in two governmental districts, Swabia and Upper Bavaria. Neuschwanstein Castle, Linderhof Palace, the King's

House on Schachen, and Herrenchiemsee New Palace were all created according to the romantic vision and under the meticulous supervision of King Ludwig II of Bavaria during his reign from 1864 to 1886. Carefully sited in in the Alps and their foothills, in landscapes of high natural and aesthetic qualities that were deliberately chosen by the king, they were designed and built as places of seclusion and as conduits for conjuring imaginary travels.

These palaces were built solely as private residences without any court functions, and were intended to inspire the enjoyment of art and the appreciation of beauty. Conceived in the age of historicism and eclecticism, they made full use of the stylistic trends and technical possibilities of the era. The inspirations for their forms and appearances were derived from, among others, Wartburg Castle, the Palace of Versailles and its gardens, German fairy tales, and Richard Wagner's operas.

King Ludwig II used all the means at his disposal to achieve his desired results. The planning and building processes were accompanied by extensive preliminary studies. He also used theatre productions and stage models to get realistic visualisations of the interiors or views before the actual building process began. Each of the component parts is, by intention, different in nature. To achieve the desired results and effect of "total works of art" (Gesamtkunstwerke), the best craftspeople and latest technologies were used. The component parts were opened to visitors shortly after the death of the king in 1886, and today are managed as museums.

The terms "castle" and "palace" in reference to the component parts are equivalent and interchangeable, according to the State Party.

Component part 01: Neuschwanstein Castle

This iconic complex occupies a steep, narrow mountain ridge against a backdrop of rugged alpine mountain scenery on the edge of the Ammergau Alps at the entrance to the Pöllat Gorge. It is a dramatic and eclectic Romanticist interpretation of Romanesque, Gothic, and Byzantine styles. The most prominent buildings on its courtyard level are the Palas (main building) with its many decorative turrets of various shapes and sizes, and the separate forty-five-metre-high quadrangular tower. Other elements include the Gateway Building at the eastern, lower-level end of the complex, and an upper-level courtyard defined by the Bower to the south, the Knights' House with the Square Tower to the north, and the two towers of the Palas at the western end. Apart from the Gateway Building, the exteriors are clad in white limestone.

In 1868 Ludwig II decided to build a new Hohenschwangau castle, the seat of the knights of Schwangau in Schwanstein that had been acquired by his father Maximilian II in 1832 and rebuilt by Maximilian in the Gothic style. Inspired by the publications of architect Eugène Viollet-le-Duc on historical styles, Ludwig II commissioned architectural surveys of the Wartburg Castle and documentation of its decoration. The original reconstruction

idea was soon given up and plans for a greater residence, Neuschwanstein Castle, were drawn, further inspired by Richard Wagner's operas and their performances.

The king stayed in the building for the first time in 1884, but never saw the castle completed. His death in 1886 halted construction works, and only about 15 rooms and chambers of the 200 planned were completed and equipped. The rest have been left as shells or unfurnished, or used for museum operation purposes.

Component part 02: Linderhof Palace

Located in the remote Graswang Valley in the Ammer Mountains of the Garmisch-Partenkirchen district, the component part comprises the Linderhof Palace, a terraced garden, and a landscaped park where several buildings and small structures such as the King's Cottage, St. Anna Chapel, Temple of Venus, Venus Grotto, and Moorish Kiosk with Peacock Throne are situated.

The palace project began in 1868 with hand-drawn sketches by Ludwig II and construction started with the renovation of an existing wooden King's Cottage in 1869. The construction of a small palace began in 1870-1871. Its design drew on the mid-18th century Rococo style of Louis XV of France, and on the Palace of Versailles. The cottage was dismantled in 1874 and rebuilt in the vicinity; the final extension of the palace was accomplished in 1884.

The most distinctive feature of the ensemble is its north-south axis. It features a sunken water *parterre* with a fountain that jets water approximately thirty metres high, an elaborate terraced staircase, and a water staircase called the Cascade on the north side of the palace. The illusionistic Venus Grotto was inspired by the Blue Grotto of Capri and the stage set of Richard Wagner's 1845 opera *Tannhäuser*.

Component part 03: King's House on Schachen

The King's House on Schachen Mountain is located 1,866 metres above sea level in the Wetterstein Mountains of the Garmisch-Partenkirchen rural district. Long panoramic views over the valley and to the surrounding mountain massifs are characteristic of its location. The component part comprises a two-storey timber-frame building in a chalet style with exterior decorations based on Ottoman wooden architecture. The ground floor rooms are typical of alpine chalets of the era. The upper floor, in contrast, is lavishly decorated and furnished as a Turkish hall, reportedly based on the Palace of Eyüp erected by Sultan Selim III of Türkiye in the late 18th century.

The house was built in 1870 solely to enable its occupant to enjoy the high mountains in comfort. The upper floor was rebuilt following the king's request to redo the just-finished Hall, which was completed in its current form in 1872. King Ludwig II visited the house regularly from that date. Of note is the grandiose high alpine location of the house, chosen by the king, and the juxtaposition of a simple mountain lodge with the Oriental wonders of the interior.

Component part 04: Herrenchiemsee New Palace

Herrenchiemsee New Palace is in the middle of Herreninsel, the largest of three islands near the western bank of Lake Chiemsee in the Chiemgau region of the foothills of the Alps, in the Rosenheim rural district. The component part comprises the palace complex and a formal garden enclosed with tall plantings situated along a main east-west axis and providing the only view and connection to the surrounding landscape. Herrenchiemsee New Palace was modelled after the Palace of Versailles in the time of Louis XIV and Louis XV and was planned from the very start to be a better, more lavish version of it. A personal residence for Ludwig II, it payed homage to the absolute monarchy. Construction of a large New Palace built around a central three-storev corps de logis began after the visit of Ludwig II to Versailles in the summer of 1874. One of the leading elements of the design is the central view from the middle rooms of the palace along the axis of the parterre d'eau with the Fortuna and Fama fountains, as well as the large avenue to the east of the palace. The east-west direction was chosen as the optimal utilisation of the dimensions of the island and for the mythological significance of Apollo, one of the iconographic focal points of the main axis that symbolises the path of the Sun.

By 1885 most of the Small Apartment in the palace had been finished so that Ludwig II could occupy it for the first (and only) time. The construction of the Herrenchiemsee New Palace was the largest and most expensive undertaking of King Ludwig II.

Works were undertaken in the gardens in the 1940s after many years of neglect. Major reconstructions took place in the 1970s, based on historical maps and photographs. Further conservation and restoration works were undertaken from 1980 to 1997.

Herrenchiemsee Old Palace is also located on the island, in the buffer zone. It is an earlier Augustinian monastery whose history goes back to the Middle Ages.

The area of the four component parts totals 75.875 ha, with buffer zones totalling 10,616 ha.

State of conservation

The nominated property is in a good state of conservation and remains largely unchanged since the death of King Ludwig II. The component parts were almost immediately opened as museums, and function as such today. The component parts do not suffer from the adverse effects of development or neglect.

Continuous management first by the stewarding division of the Bavarian court and since 1918 by the Bavarian Department of State-owned Palaces, Gardens and Lakes (known as the Bavarian Palace Department (BSV)) has put a strong focus on maintenance and management in accordance with accepted principles of conservation.

In light of an increasing numbers of tourists at the Neuschwanstein Castle component part (01) in the 1980s, safety and tourism management measures were progressively introduced. They have included construction of a subterranean tunnel and service areas, structural fire prevention measures, and conservation and restoration works. A conservation plan was implemented by the BSV in 2017. The plan is being executed in phases while the castle remains open to visitors. Complete restoration of ninety-three rooms is complemented by tests concerning the building structure.

The King's House on Schachen component part (03) is in a good state of conservation despite very harsh high-alpine climatic conditions. Repair and restoration of the facades, renewal of the roofing, as well as improvements to fire protection measures have been completed in recent years.

Major conservation of the Linderhof Palace component part (02)'s grounds began in 1998. This has included restoration of the gardens and garden structures. Since 2001, there have been conservation works conducted in the palace itself. These include the installation of fire protection measures, the installation of a ventilation system, and the repair of the facades and roofs.

Restoration of the Venus Grotto in the Linderhof Palace component part (02) is underway, due to be completed in 2025. Earlier maintenance and repair works there were mostly limited to external areas. The current works include sealing and dehumidification measures, and construction of a new, mostly subterranean extension for visitors' toilets, operating staff, and technical rooms. The historical structure is to be consolidated and permanently secured, measures to minimise water induction and precipitation are to be initiated, and installations to manage interior climatic conditions will be put in place.

Successive restoration and conservation works have been undertaken in the Herrenchiemsee New Palace component part (04) since 1995. They include installation of fire protection measures, development of the unfinished rooms and visitor facilities, and repair of the facades and roofs. Some individual rooms and parts of the decor have also been restored. The grounds are well maintained following extensive multiphase garden restorations and reconstructions to address decades-long neglect.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are environmental conditions, tourism, and traffic congestion and emissions.

The alpine climate requires constant monitoring and maintenance of the built and natural features of the nominated property. Snow, heavy rain, and fierce winds have an impact on the structural elements and tree stands, as do rockslides. Climate change may increase the frequency and intensity of weather events in the future.

The potentially unstable rock surfaces are monitored regularly at Linderhof Palace (02) and Neuschwanstein Castle (01). Appropriate procedures are in place, and any issues have been quickly resolved.

The nominated property is affected to varying degrees by very significant actual or potential pressure from tourist activities. Visitor statistics for the last ten years indicate that pre-COVID-19 annual visitor numbers were stable. The Neuschwanstein Castle (01) was the most visited, with more than 1.5 million visitors a year. Linderhof Palace (02) received about 400,000 visitors and Herrenchiemsee New Palace (04) just over 375,000 visitors. Due to its high mountain location, the King's House on Schachen (03) averaged only 10,000 to 12,000 visitors a year. Visitor numbers have risen each year, but have yet to reach the figures recorded prior to the COVID-19 epidemic.

The large number of tourists at three of the component parts has had little effect on the monuments so far. Nevertheless, more effective solutions are necessary, particularly concerning fragile surfaces that need special protection. The negative impact of the large number of visitors to Neuschwanstein Castle (01), for example, has been the subject of numerous press articles. One of the problems is traffic congestion and the resulting pollution, especially in the summer months. Despite the economic importance of tourism, its impact on the environment and local life is inevitable and should be taken into consideration.

No information has been provided on the carrying capacity of the component parts. There is also no analysis of the pressures that may be caused by tourist activities within the nominated property and in the settings of the individual component parts. An overall visitor strategy for the nominated property and its component parts should therefore be developed and implemented as a priority.

ICOMOS considers that the state of conservation is good and that the factors affecting the nominated property are under control, though further attention will likely be needed to mitigate the impacts of mass tourism.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated property is inextricably linked to the person, intentions, and working methods of King Ludwig II, who used all the means at his disposal to immerse himself in an artistic world that was far removed from the constraints of his monarchical duties.
- These palaces combine cultural and intellectual threads of the 19th century to create a unique testimony to a widespread phenomenon of artistic and theatrical constructions for "imaginary journeys" to past times and to distant places, based on the vision and powers of King Ludwig II, and on solutions enabled by technology.
- The palaces of King Ludwig II are artificial worlds of "total works of art" (Gesamtkunstwerke), made up of buildings and landscapes whose structural, artistic, and staging techniques were intended to create a universal artistic experience for the enjoyment of their creator, not the public.
- Modern entertainment culture (cinema, amusement parks, virtual reality) originated in the 19th century and can still be experienced here, which allows the palaces of King Ludwig II to transcend their era. This is especially evident in the role of Neuschwanstein Castle in contemporary mass media.
- The palaces of King Ludwig II have become icons associated worldwide with Bavarian and German culture.

Based on the nomination dossier and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows: staged experiential and visual architecture; integration into the landscape; *Gesamtkunstwerke* – "total works of art"; ephemeral art of staging (World's Fairs/theatre); "imaginary journey simulations"; precursors of theatre or film architecture/theme parks; and part of the modern cultural and media world.

The State Party contends that the nominated property is inseparable from the person of King Ludwig II, his intentions, and his working methods. It is argued that the component parts have the function of being staged experiential or visual architecture for the poetic, imagined worlds of their user, and that the castles are now the only testimony to a phenomenon that was widespread in the 19th century: the artistic and theatrical realisation of "imaginary journeys" to distant places and past times.

First, ICOMOS considers that the concept of "imaginary journey simulations" has not been adequately researched in relation to architecture and place-making, and the lack of data does not allow the nominated property to be

assessed within an appropriate context or on an adequate scientific basis.

Second, ICOMOS underlines that the World Heritage Convention is a property-based instrument. While the component parts are each considered as "total works of art" by the State Party, ICOMOS also notes that three were not fully completed during the lifetime of their creator. Consequently, the justification for inscription and the narrative of the nomination should not be solely articulated around the personality of King Ludwig II.

Third, ICOMOS notes that the nominated property was realised on the basis of the vision of Ludwig II for dwellings as works of art and "poetic places of refuge". With more than two million visitors a year collectively, the component parts have become places of curiosity and have lost the intimate nature of seclusion that enables such refuge and imaginary journeys.

In its interim report, ICOMOS raised these concerns and informed the State Party that historicism and reinterpretation of architectural styles aiming at the creation of a total work of art would provide more robust grounds for justification. The State Party responded in February 2025, emphasising the importance of the nominated property as an exceptional synthesis of architecture, art, technology, and staging, as well as a 19th century interpretation of the architectural styles. At the same time, the State Party also argued for the significance of the property as representing an important interchange of human values in reference to World's Fairs, theatre and opera performances, and theme park and film architecture (Walt Disney, for example).

Finally, ICOMOS recommends that the name of the nominated serial property be changed to "The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee".

Comparative analysis

The comparative analysis has been developed around two parameters: sites from the 19th century illustrating historicism as nation building; and sites from the 19th century illustrating historicism and representation. It has examined properties throughout the world inscribed on the World Heritage List and included in the Tentative Lists of States Parties.

The State Party contends that the nominated property belongs to categories that are not yet represented on the World Heritage List, and that architecture of the 19th century in general is underrepresented on the List.

The comparative analysis begins with a lengthy essay aimed at confirming that the 19th-century search for and creation of a perfect artificial world and terrestrial paradise is nowhere more comprehensible than in the palaces of King Ludwig II, built in the age of historicism and within the stylistic trends and technical possibilities of the era. It also underlines the importance of Ludwig II as their creator

Some analysis has been made in the form of brief case studies involving twenty-four properties inscribed on the World Heritage List and six on the Tentative Lists. Under the parameter of "historicism as nation building", Middle Rhine Valley (Germany, 2002, criteria (ii), (iv) and (v)), among others, is described. While the compared properties, like the nominated property, make conscious references to a common history and nation through architectural means, the State Party considers that they differ fundamentally in their function and intention and therefore cannot be compared. It comes to a similar conclusion regarding the "historicism and representation" parameter, in reference to properties such as Chhatrapati Shivaji Terminus (India, 2004, criteria (ii) and (iv)).

ICOMOS considers that the comparative analysis overlooks aspects of escapism and idealism or the use of recent technology in, for example, Castles and Parks of Potsdam and Berlin (Germany, 1990, 1992, 1999, criteria (i), (ii) and (iv)) and Cultural Landscape of Sintra (Portugal, 1995, criteria (ii), (iv) and (v)). As regards the emergence of theme parks, Tivoli Gardens in Copenhagen, Denmark, which opened in 1843 and is one of the oldest theme parks, is not mentioned. An important part of the argumentation relates to ephemeral productions at World's Fairs during the 19th century. The comparison is narrowed down to the 1867 Paris International Exposition, however, and many surviving structures are not included in the analysis.

In its interim report, ICOMOS requested more information on the way theatrical visions are implemented through architecture, and asked the State Party to complete the comparative analysis by including the realisation of other "alternative worlds" and/or "theatrical fantasies". In February 2025, the State Party responded by naming or presenting over two dozen 19th and early 20th-century examples, both inscribed and not inscribed on the World Heritage List, that illustrate the spread of the phenomenon and the richness and diversity of its realisations. The response, while informative, lacks details structured in a way that would help understand the significance of the nominated property in this respect.

In terms of choosing the component parts and justifying the choices made, the State Party indicates that these four component parts form a closed series; no others have similar attributes. Each component part contributes in a specific way to the compositional totality of the series and cannot be replaced or augmented by another component part from this period.

ICOMOS considers that some argumentations can be debated, and regrets that properties not inscribed on the World Heritage List or Tentative Lists were not fully explored in the analysis. Nevertheless, the comparative analysis indicates that there are no comparable properties globally with similar values, and therefore justifies the selection of the component parts.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (i), (ii), (iii), (iv) and (vi).

Criterion (i): represent a masterpiece of human creative genius;

This criterion is justified by the State Party on the grounds that the component parts of the nominated property are unique masterpieces of the natural landscape, architectural, artistic, and staging techniques of their time, each being total works of art and inseparable from the person of King Ludwig II, his intention, and his extraordinary methods of work.

The nominated property is a collection of mostly monumental buildings and associated landscapes that were heavily inspired by existing models, each representing an attempt to create a place that fully expressed the romantic imagination and eclectic taste of its patron. Most were never finished. Each component part – despite some similarities – has a distinctive character, created over a short period of time through different processes. Collectively and individually, they cannot be considered an outstanding (complete, inventive or original) or landmark example of a movement or style that evolved within a culture; that is, not as a masterpiece of human creative genius.

ICOMOS considers that this criterion is not demonstrated.

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the nominated serial property gives a unique insight into the art of staging employed at the World's Fairs and effects on the theatre stage during the 19th century, and thus into the epoch-making cultural phenomena of that time

ICOMOS considers that the justification put forward by the State Party needs additional research on staging at World's Fairs and theatrical effects in the context of developments in architecture, technology, monumental arts, and/or landscape design to support this criterion and position the nominated property within this framework. The precise nature of the exchanges of values must be described, and a relevant span of time also needs to be defined.

Additionally, ICOMOS considers that the reference to World's Fairs is not adequately supported by the comparative analysis. It should be noted that these exhibitions were commercial and political events, and the motivation behind them extended well beyond entertainment or aesthetic appreciation in ways that are not addressed by the State Party.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the royal palaces of Ludwig II bear unique testimony to significant cultural phenomena of the 19th century that have now disappeared, such as "imaginary travel structures" and "tableaux" of distant worlds and past times, that today provide an incomparable insight into the origins of illusionistic art at that time.

ICOMOS observes that this criterion is intended to address cultural traditions that have defined a way of life or a civilisation, normally over a long period of time. The cultural traditions may be ways of building, spatial planning or urban patterns, and must express issues of a universal nature common to or addressed by all human cultures. Proposing "imaginary travel structures" and "tableaux" and other ephemeral illusionistic art as a cultural tradition does not fit comfortably within the conventional application of this criterion.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

This criterion is justified by the State Party on the grounds that the royal palaces of Ludwig II are not only highlights of artistic trends of the 19th century, they also bear witness to a universal phenomenon and need that has affected the whole of humankind to this day: the search for, and the most perfect realisation possible of, artificial worlds and terrestrial paradises that transport one into a better, poetic world. The worlds created by King Ludwig II are viewed by the State Party as precursors of cinema and modern thematic architecture.

ICOMOS observes that this criterion is intended to determine the outstanding nature of the typology of a property, nominated in the context of the defined typology illustrating one or more significant stages in history. The criterion should be used in relation to significant prototypes or strongly representative examples of a defined type of property. The position or status of the nominated property within the proposed typology of artificial worlds and terrestrial paradises is not adequately supported by the comparative analysis. Further research and comparative analyses are needed to determine whether artificial worlds and terrestrial paradises can be said to constitute a typology, and if so, whether the nominated property can be considered a significant prototype or strongly representative example.

In addition, ICOMOS considers that the claim of the nominated property to be a precursor of cinema and modern thematic architecture has not been supported by relevant scholarship and analysis.

However, the nominated property displays a varied range of architectural and artistic styles, that testify to great intellectual and symbolic depth, and demonstrate a high level of artistic and technological skill. The four remarkably well-preserved component parts individually and collectively represent a symbiosis of architectural trends popular during a period in history that had a particular penchant for historicism and eclecticism. Conceived, designed, and executed under King Ludwig II's personal guidance, the nominated property is a remarkable example of the historicist movement that developed in the second half of the 19th century, combining the revival of earlier artistic styles with stage and theatrical effects and the use of modern technologies. The results are total works of art of a particular beauty, scale, and luxury.

ICOMOS considers that this criterion is demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that, as "total works of art" including architecture, literature, music, the fine arts, and staging techniques, the royal palaces of Ludwig II uniquely combine the cultural and intellectual history of the 19th century, and today are an indispensable part of our modern culture and media world.

ICOMOS observes that the events, living traditions, ideas, beliefs or artistic or literary works that form the basis for this criterion must themselves be of outstanding universal significance, and must be demonstrated directly or tangibly in the nominated property. The "total works of art" that are proposed as the foundational justification of this criterion, have not been tangibly associated with the nominated property in very specific ways. The claim that the nominated property uniquely combines the cultural and intellectual history of the 19th century is very broad and not entirely substantiated. The references to modern culture and media, as well as to national identity, are likewise unconvincing. And, finally, uniqueness is not, on its own, sufficient to justify inscription.

In the case where a nominated property is intended to represent the legacy of an architect or designer, it should be underlined that the World Heritage Convention is a property-based instrument.

ICOMOS considers that this criterion is not demonstrated.

The State Party has presented the key attributes as high-level concepts, rather than specific tangible elements that will form the focus for all actions related to the protection, conservation, and management of the nominated property. The seven proposed attributes are vague and generalised to such a degree that the aspects to be protected and conserved are not readily apparent. In addition, the surrounding landscapes — which are important features of the nominated property — appear to

have been identified as attributes, but are within the boundaries of the buffer zones, not the nominated property. ICOMOS recommends that the State Party identify more precisely and concretely the key attributes that support the proposed Outstanding Universal Value.

ICOMOS considers that the nominated property meets criterion (iv), but that criteria (i), (ii), (iii) and (vi) have not been demonstrated.

Integrity and authenticity

Integrity

The integrity of a nominated property is a measure of the completeness or intactness of the attributes that convey its proposed Outstanding Universal Value. For a serial nomination, integrity is also a measure of whether the component parts, individually and collectively, contain all the attributes necessary to express in a substantial way the proposed Outstanding Universal Value of the nominated property as a whole, and how each component part contributes to that value. Integrity is furthermore a measure of the intactness of the attributes.

The integrity of the nominated property is based on the buildings and landscapes that express the vision of King Ludwig II of evocative places intended to promote seclusion and inspire the appreciation of beauty. The nominated serial property contains all the presumed attributes necessary to convey the proposed Outstanding Universal Value, including buildings, structures, and associated parks and gardens.

All the component parts of the nominated property are generally in a good state of conservation, and remain largely unchanged since the death of King Ludwig II. They are characterised by their exceptional locations, outstanding natural beauty of their settings, and deliberately chosen seclusion. Each component part includes the elements necessary to express the proposed Outstanding Universal Value. None of the component parts suffer from the adverse effects of development or neglect.

ICOMOS considers that the integrity of the whole nominated series as well as the integrity of each of the component parts have been demonstrated.

Authenticity

The authenticity of the nominated property is based on how the attributes of the potential Outstanding Universal Value convey their value. Its authenticity is evaluated in terms of the attributes that are related to the locations and settings, forms and designs, materials and substances, and spirit and feeling of the nominated series as a whole and in each component part.

The component parts of the nominated series are in their original locations, and their settings remain highly evocative of the past. The presumed attributes are authentic in terms

of their forms and designs, and their historic materials and substances have been conserved to the degree possible. The associated gardens and parks have been managed with sensitivity to their historical configurations. The feeling of the visually sensuous world of King Ludwig II has been maintained.

ICOMOS considers that the authenticity of the whole nominated series, as well as the authenticity of each of the component parts have been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and of authenticity of the whole nominated series and of the individual component parts have been met.

Boundaries

There are four inhabitants in the Linderhof Palace component part (02). The other component parts are not inhabited. There are 488 inhabitants in the Neuschwanstein Castle (01) buffer zone, 23 in the Linderhof Palace (02) buffer zone, none in the King's House on Schachen (03) buffer zone, and 20 in the Herrenchiemsee New Palace (04) buffer zone.

The boundaries of the Neuschwanstein Castle (01), King's House on Schachen (03), and Herrenchiemsee New Palace (04) component parts follow the protection zones defined by the Bavarian State Office for the Preservation of Monuments. The boundary of the Linderhof Palace component part (02) follows the historical park planning of 1874. The boundaries are defined in such a way as to include all presumed attributes.

There is some ambiguity concerning structures such as the Hermitage of Gurnemanz, Hunding's Hut, and Moroccan House, which are within the boundaries of the Linderhof Palace component part (02), but not consistently identified by the State Party as being part of the nominated property. In its interim report, ICOMOS requested clarification on the matter. In February 2025, the State Party replied that the buildings are replicas created to allow visitors to experience all the themed installations from King Ludwig II's time and therefore support the proposed Outstanding Universal Value.

While the logic used to delineate the boundaries is not entirely consistent between the four component parts, they can be considered appropriate in terms of encompassing the presumed attributes of the proposed Outstanding Universal Value.

The non-landscaped surroundings have been classified as buffer zones, while the landscaped areas (parks and gardens) designed by King Ludwig II are considered as belonging to the component parts. The buffer zone boundaries of the Neuschwanstein Castle (01), Linderhof Palace (02), and King's House on Schachen (03) component parts are based on the intentional staging of the royal palaces by King Ludwig II in their alpine locations, and the buffer zone boundary of the

Herrenchiemsee New Palace component part (04) is based on the deliberate separation of the artistic space of from the everyday world. Each of these large buffer zones encompasses key vistas and views to and from the component part.

The buffer zones support the proposed Outstanding Universal Value by creating an added layer of protection for the nominated property.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that, despite some weaknesses, the comparative analysis justifies consideration of the nominated property for the World Heritage List. Criterion (iv) has been met, whereas criteria (i), (ii), (iii) and (vi) have not been demonstrated. The conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met, and the boundaries of the nominated serial property and its buffer zones are satisfactory.

4 Conservation measures and monitoring

Documentation

The Bavarian Palace Department (BSV) has extensive inventories on the museum, buildings, and gardens, and commissions restoration assessments for this purpose. The BSV and the state construction authorities of Kempten (Neuschwanstein Castle, 01), Weilheim (Linderhof Palace and the King's House on Schachen, 02 and 03), and Rosenheim (Herrenchiemsee New Palace, 04) that are responsible for designated properties compile expert reports and conservation reports on current measures, monitoring, research, and legal requirements. These are prepared in-house or by commissioned external specialists. As a rule, extensive architectural survey, conservation, and construction reports are prepared by experts to develop remedial measures. For special and exemplary restorations, short reports or extensive documentation are published. In addition, the BSV website publishes current information on ongoing construction and restoration work at the various component parts.

All the component parts have been fully inventoried, described, and documented to a high standard. A list of selected inventories and conservation documentation is included in the draft management plan.

Conservation measures

The BSV coordinates and supervises maintenance and all conservation interventions. It has an independent, experienced administrative structure that specialises in monument protection. Comprised of relevant professions, it includes art historians, architects, and restorers.

The nominated property is in a good state of conservation. Its continuous management has guaranteed a high standard of protection and long-term conservation of the

fabric of the monuments. For all the component parts, the focus is on maintenance and conservation as well as improvements for visitors and/or sightseeing. Measures aimed at conserving the historic fabric are performed at regular intervals. Funds for their implementation have been secured.

Monitoring

The BSV has many years of experience in the management and conservation of historical complexes. This includes monitoring the stability, condition of building fabric, fire protection, lightning protection, climate, preventive conservation, and visitor management. The monitoring is intended to conserve the structures and furnishings in the best possible condition.

There is a need to develop specific monitoring indicators that relate to the attributes of the proposed Outstanding Universal Value. In this regard, more structured, purpose-related, and detailed data is necessary, and appropriate indicators are required for the specific aspects that are being monitored to facilitate effective conservation and management in the future.

ICOMOS considers that the documentation of the nominated property is satisfactory, and its state of conservation is good. ICOMOS considers that it would be advisable that the monitoring system is further developed to encompass all the attributes of the proposed Outstanding Universal Value and is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

Statutory protection for the four component parts arises from the Law on the Protection and Preservation of Monuments (Bavarian Monument Protection Law -BayDSchG) of 25 June 1973, as amended. The component parts are registered in the list of monuments as individual monuments pursuant to Article 1 of the Law. Neuschwanstein Castle (01) was registered in 1979 (no. D-7-77-169-33), Linderhof Palace (02) and park with individually enumerated elements was registered in 1974 (no. D-1-80-115-25), the King's House on Schachen (03) was registered in 1976 (no. D-1-80-117-277), and Herrenchiemsee New Palace (04) and park was registered in 1973 (no. D-1-87-123-26). Additionally, according to BayDSchG, a World Heritage property has special protection status, and all alterations require relevant consent.

Nature conservation legislation at the federal and state levels also applies. It includes the Federal Nature Conservation Act (Bundesnaturschutzgesetz BNatSchG) of 29 July 2009 (BGBI.I S. 2542) and the Law on the Protection of Nature, the Maintenance of the Landscape and Recreation in Nature (Bavarian Nature Conservation Law – BayNatSchG), dated 23 February 2011 (GVBI. S.

82), as amended. The King's House on Schachen and Linderhof Palace component parts (02 and 03) are situated within the Schachen and Reintal nature conservation area and the Ammer Mountains nature conservation area respectively, with their buffer zones almost completely covered by nature protection regimes. The Herrenchiemsee New Palace component part (04) and its buffer zone are included in water conservation and landscape protection areas. In the case of Neuschwanstein Castle (01), there is patchwork of nature protection regimes in the buffer zone at present. There are also areas designated within the European Union's Natura 2000 network of protected ecological areas, as well as protected flora and fauna habitats in the component parts' vicinity.

Further regulations are in place due to federal and state building legislation that includes the 2004 Building Code (BauGB) and 2007 Bavarian Building Code (BayBO), the 2012 Bavarian Land Use Planning Act (BayLplG), as well as other legal instruments.

All the component parts of the nominated serial property are owned by the Free State of Bavaria. Therefore, the Bavarian State Construction Authority, under the technical supervision of the Bavarian Palace Department (BSV), is responsible for all direct construction measures in the nominated property, where it monitors compliance with the applicable regulations under public law. All alterations to the monuments require permission in accordance with Article 6 of the Bayarian Monument Protection Law. Approval is granted by the building authorities. Conservation works in the nominated property are planned and conducted by the BSV. Where necessary, coordination with the Bayarian State Office for the Preservation of Monuments (BLfD) takes place and an additional assessment of the compatibility of measures in terms of monument conservation is conducted.

Each component part has an extensive buffer zone delineated on the basis of visual studies. They are meant to preserve the wider settings, vistas, and views associated with the component parts. According to additional information submitted by the State Party in November 2024, the extent of the buffer zones was determined in agreement with the local authorities. They have no separate legal status, but are regulated within the framework of existing building, planning, nature conservation, and monument protection laws, which contain consultation mechanisms for the public bodies concerned.

Management system

The four component parts are managed as museums by the Bavarian Department of State-owned Palaces, Gardens and Lakes (BSV), whose tasks are defined by the regulation on the Bavarian Department of State-owned Palaces, Gardens and Lakes (BayBSVV) adopted in 2001 and later amended. The BSV coordinates any construction and monument conservation related issues. Its construction department is responsible for practical maintenance, and exercises the specific supervision in view of monument protection for construction measures

via the state construction authorities and in coordination with the Bavarian State Office for the Preservation of Monuments. The respective Palace and Garden Administrations (SV-Neuschwanstein, SGV-Linderhof, and SGV-Herrenchiemsee) organise the daily visitor operations and manage the individual properties.

The costs of conservation works are covered from the budgetary funds managed by the Bavarian State Ministry of Finance and Regional Identity.

A steering group is planned to be established in the event the nominated property is inscribed on the World Heritage List. It will be chaired by the BSV, and will monitor all construction and design measures affecting the component parts, and coordinate and vote on World Heritage-relevant projects planned in their immediate settings. The steering group is proposed to include representatives of the relevant municipalities and administrative districts, Bavarian Free State ministries, state forests, and ICOMOS.

The draft management plan developed for the nominated property is a communication and coordination document with no formal (legal) status. The plan summarises all existing legal protection mechanisms and is a catalogue of the past and current management of the component parts, and in particular of the buildings and their interiors. Strategies and measures include the preservation of the historical appearance and the conservation of the artistic originality and authenticity of the nominated property; the greatest possible protection of the building and furnishings; the implementation of conservation-restoration measures in accordance with state-of-the-art practices; and sustainable use and visitor management compatible with monument conservation.

According to additional information provided by the State Party in February 2025, any external impacts on the nominated property must be identified and taken into account in the respective municipality's relevant decisions, and where necessary, Heritage Impact Assessments are to be carried out. This requirement derives directly from the State Development Plan Bavaria (LEP), which obliges the municipalities to adapt their regional planning to its requirements. The protection of properties inscribed on the World Heritage List is a direct consequence of Section 1 No. 8.4.1 (Z) of the LEP, according to which the Outstanding Universal Value of these properties, including their surroundings, must be preserved.

ICOMOS notes that the draft management plan is an internal document of the Bavarian Department of State Palaces, Gardens and Lakes, and does not cover many of the issues related to the overall management of the nominated property and its buffer zones. An overall, forward-looking short- and medium-term strategy that responds to the factors affecting the proposed Outstanding Universal Value should be included in the document. At the same time, issues relating to the nominated property's natural and cultural environments

should be further synchronised with the protection of the nominated property and fully integrated into management practices.

Visitor management

The nominated property is among the major tourist attractions in Germany. The component parts have a developed infrastructure along with effective and efficient tourism, visitor management, and interpretation strategies in place that enable presentation in a way that is compatible with the conservation of the monuments. Tourist information is accessible in an impressive number of languages (19 foreign languages in Neuschwanstein and Herrenchiemsee, and 25 in Linderhof). There are themed tours and classes above and beyond the regular tours offered. They are supported by many general-interest and scientific publications.

ICOMOS considers that the impacts of tourism on sustaining the local economy and infrastructure are not adequately addressed. There are visitor facilities in the local municipalities, but the management and governance system does not sufficiently involve the local authorities managing the buffer zones, given that the integration of the component parts with their surrounding landscapes is an important aspect of the nominated property.

ICOMOS considers that an overall visitor strategy for the four component parts of the nominated property should be developed. So far, beyond the fact that they are managed by the same entity, only a combined entry ticket and a reduced price for local visitors has been introduced. For all the component parts, the maximum number of visitors has already been defined and implemented by the introduction of maximum group sizes and timed visits at peak hours. An increase in visitor numbers is not planned by the State Party but should be anticipated, and the potential impact of such an increase on the local economy, nearby communities, and natural environment should be taken into account.

Community involvement

The public was informed and subsequently involved in the nomination process at the political level. Voting processes took place at the state level (Bavarian State Parliament) as well as at the municipal level (municipal councils). The municipalities formally supported the World Heritage nomination by adopting a relevant resolution in 2017. In the municipality of Schwangau where the Neuschwanstein Castle component part (01) is located, a 2023 referendum resulted in a not-insignificant minority opposing the nomination.

In its interim report, ICOMOS requested the State Party's perspective on the potential future impact that the disapproval of a group of citizens might have for the nomination. In February 2025, the State Party replied that the concerns expressed in the municipality of Schwangau have been considered in the nomination process. The State Party also reported that in the medium term, Neuschwanstein Castle (01) will work toward reducing the number of visitors as well as spreading visits over the year

by implementing an online booking system and other digital measures.

ICOMOS considers that participatory processes with local community involvement should be part of the daily management of the nominated property. A framework along these lines should be developed and integrated into the draft management plan.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection is satisfactory, and that management of the nominated property is well established. An overall, forward-looking short- and medium-term strategy that responds to the factors affecting the proposed Outstanding Universal Value should be included in the management plan. In addition to conservation and visitation issues, it should address the role and impact of tourism on the local and regional economies in quantitative and qualitative terms, as well as future tourism-related projects or potential developments within the nominated property itself, its buffer zones, and the regions in general. The role of local communities should also be clearly addressed.

6 Conclusion

The Palaces of King Ludwig II of Bavaria is a serial nomination comprised of four lavish and architecturally eclectic palace complexes located in the alpine region of Bavaria, Germany. Created according to the romantic vision of King Ludwig II of Bavaria and carefully sited in landscapes of high natural and aesthetic qualities, these palaces were designed and built as total works of art with the use of stage and theatrical effects to function as places of seclusion.

ICOMOS acknowledges the effort made by the State Party in elaborating the nomination dossier and in investing the necessary resources for conservation and protection over a considerable span of time. The work done by the State Party to research and document the nominated property is thorough.

Outstanding Universal Value has been demonstrated under criterion (iv). Criteria (i), (ii), (iii) and (vi) have not been demonstrated. The conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met, and the boundaries of the nominated serial property and its buffer zones are satisfactory.

The component parts have been inventoried and documented to a high standard, and are in a good state of conservation. The legal protection is satisfactory, and management of the nominated property is well established and adequate.

Recommendations have been made to improve the draft management plan, management system, visitor strategy, monitoring system, and community involvement.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee – From Dreams to Reality, Germany, be inscribed on the World Heritage List on the basis of **criterion (iv)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Palaces of King Ludwig II of Bavaria are located in the Free State of Bavaria, in Swabia and Upper Bavaria, Germany, Carefully sited in the Alps and their foothills, in landscapes of high natural and aesthetic qualities, they were designed and built as places of seclusion, according to the romantic vision and under the meticulous supervision of King Ludwig II of Bavaria during his reign from 1864 to 1886. These palaces were built solely as private residences and were intended to inspire the enjoyment of art and the appreciation of beauty. Lavishly decorated and varying in nature and appearance, Neuschwanstein Castle, Linderhof Palace and its garden and park, the King's House on Schachen, and Herrenchiemsee New Palace with its garden were conceived in the age of historicism and eclecticism. Being staged visual architecture for poetic, imagined worlds, the four palaces made full use of the stylistic trends and technical possibilities of the era. To achieve the desired results and effect of "total works of art" (Gesamtkunstwerke), the best artists, craftspeople, and latest technologies were used. The inspirations for their forms and appearances were derived from, among others, Wartburg Castle, the Palace of Versailles and its gardens, and Richard Wagner's operas.

Criterion (iv): The Palaces of King Ludwig II of Bavaria are remarkably well-preserved, and display a varied range of architectural and artistic styles. They testify to great intellectual and symbolic depth, and demonstrate a high level of artistic and technological skill. The four component parts individually and collectively represent a symbiosis of popular architectural trends during the second half of the 19th century, particularly the penchant for historicism and eclecticism. Conceived as places of seclusion, the four castles were built under the meticulous direction of King Ludwig II. They were designed as total works of art of remarkable beauty, scale and luxury, and incorporate scenic and theatrical effects.

Integrity

The serial property contains all the attributes necessary to convey the Outstanding Universal Value, including buildings, structures, and associated parks and gardens.

All the component parts of the property are in a good state of conservation and remain largely unchanged since the death of King Ludwig II. They are characterised by their exceptional locations, outstanding natural beauty of their settings, and deliberately chosen seclusion. None of the component parts suffer from the adverse effects of development or neglect.

Authenticity

The component parts of the series are in their original locations, and their settings remain highly evocative of the past. The key attributes are authentic in terms of their forms and designs, and their historic materials and substances have been conserved to the degree possible. The associated gardens and parks have been managed with sensitivity to their historical configurations. The feeling of the visual world of King Ludwig II has been maintained.

Protection and management requirements

Statutory protection for the four component parts is governed by the Law on the Protection and Preservation of Monuments (Bavarian Monument Protection Law – BayDSchG) of 25 June 1973, as amended. The component parts have been registered as monuments since the 1970s. Additionally, according to the BayDSchG, a World Heritage property has special protection status, and all alterations require relevant consent. Furthermore, the laws and regulations relating to the protection of nature and landscapes, and of water resources, as well as other regulations also apply within the boundaries of the property and its buffer zones.

The Palaces of King Ludwig II of Bavaria are owned by the Free State of Bavaria. The responsible authority for the management of the property is the Bavarian Palace Department, which, in close cooperation with the Bavarian State Office for the Preservation of Monuments and other parties involved, coordinates and supervises all structural, restoration, and conservation works. A steering group will monitor the conservation of the component parts and the protection of their respective buffer zones.

A draft management plan has been prepared to be used as a communication and coordination instrument that facilitates participatory management of the serial property and its settings. It should be revised to include a visitor management strategy that responds to the factors affecting the Outstanding Universal Value of the property, and to address issues relating to the natural and cultural environment of the property that should be effectively synchronised and fully integrated into management practices.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

 Approving and implementing the draft management plan after revising it to include a forward-looking strategy that responds to the factors affecting the Outstanding Universal Value, the role and impact of tourism on the local and regional economy, the role of local communities, and issues relating to the natural and cultural environment of the property that should be further synchronised and fully integrated into management practices,

- b) Making operational the proposed steering group chaired by the Bavarian Palace Department that will monitor all construction and design measures affecting the component parts and coordinate World Heritage-relevant projects planned in their immediate settings,
- c) Identifying more precisely the key attributes that support the Outstanding Universal Value of the property and thereby form the focus of protection, conservation, and management actions,
- d) Developing specific monitoring indicators that relate to the attributes of the Outstanding Universal Value, on the basis of more structured, purpose-related, and detailed data, to facilitate effective conservation and management in the future.
- e) Developing and implementing an overall visitor strategy as a priority to mitigate the impacts of mass tourism.
- f) Ensuring that participatory processes with the local community are developed and integrated into the management plan and are part of the daily management of the property,
- g) Better integrating the local authorities and agencies which have responsibility over the buffer zones and wider settings into the management and governance system of the property, given the vital role the surrounding landscape plays in each component part.

ICOMOS recommends that the name of the serial property be changed to "The Palaces of King Ludwig II of Bavaria: Neuschwanstein, Linderhof, Schachen and Herrenchiemsee".



Map showing the location of the nominated component parts

Minoan Palatial Centres (Greece) No 1733

1 Basic information

Official name as proposed by the State Party

Minoan Palatial Centres

Location

Knossos Municipality of Heraklion Regional Unit of Heraklion

Phaistos Municipality of Phaistos Regional Unit of Heraklion

Malia Municipality of Malia Regional Unit of Heraklion

Zakros Municipality of Sitia Regional Unit of Sitia

Zominthos Municipality of Anogeia Regional Unit of Rethymno

Kydonia Municipality of Chania Regional Unit of Chania

Crete Greece

Brief description

The Minoan Palatial Centres consist of six archaeological sites located on Crete – Knossos, Phaistos, Malia, Zakros, Zominthos, and Kydonia – dating from 2800 BCE to 1100 BCE. These sites exemplify the Minoan Civilisation, a significant prehistoric society in the Mediterranean. The palatial centres reflect the development of a hierarchical society through features such as monumental architecture, advanced urban planning, and cultural innovations. They functioned as administrative, economic, and religious hubs, characterised by multi-storey structures with courtyards, storerooms, workshops, and frescoes. Extensive archaeological evidence brings to light the maritime networks of Minoans, early writing systems, and interactions with other Mediterranean cultures.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of six *sites*.

Included in the Tentative List

16 January 2014 as "Minoan Palatial Centres (Knossos, Phaistos, Malia, Zakros, Kydonia)"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 15 to 21 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 4 October 2024 requesting further information about the description of the nominated property, the selection of component parts, the justification for Outstanding Universal Value, the conservation plan, artistic interpretations and authenticity, integrity, and the tourism development plan.

Additional information was received from the State Party on 11 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the selection of component parts, the definition of "palatial centre", the justification for Outstanding Universal Value, the boundaries of nominated property and buffer zones, the conservation and interpretation, and the development of a comprehensive management plan.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property consists of the remains of six significant palatial centres of the Minoan Civilisation, Knossos, Phaistos, Malia, Zakros, Zominthos, and Kydonia, which are spread across the island of Crete.

The concept of "Minoan palatial centre" was originally popularised by Sir Arthur Evans during his pioneering excavations at Knossos (component part 001) in the early 20th century. This concept has evolved beyond its early interpretation as a royal residence to encompass sites of political, economic, and religious activity. Hierarchical organisation and central administration characterise these centres, though scholarly debates persist due to the absence of ruler iconography, the existence of similar elite structures outside palaces, and evidence that crafts, writing, and ranking systems predated palace construction. Despite alternative terminology, the central court remains the defining feature, facilitating large-scale gatherings and reinforcing the pivotal role of these complexes in the Minoan society. In the additional information of February 2025, the State Party explained that the Minoan palatial centres are not merely royal residences but multifunctional hubs of political, economic, and religious activity, demonstrating hierarchical organisation and central administration within the Minoan society.

Component part 001: Knossos

Knossos is the largest and most intricate Minoan palace complex, covering about 22,000 square metres. Located on Kephala Hill near the Kairatos River, it was a hub of Minoan culture from 1900 BCE to 1350 BCE. The site features the remains of multi-level buildings, paved courtyards, advanced water management systems, and elaborately decorated interiors. It is closely linked to Minoan religious practices and mythology, particularly the legend of King Minos and the Labyrinth.

Component part 002: Phaistos

Phaistos, located on a hill overlooking the Messara Plain, is a prime example of advanced Minoan engineering and architecture. The first palace complex, covering about 8,000 square metres, was developed during the Protopalatial and Neopalatial periods (approximately between 1900–1450 BCE). Notable features include central courtyards, monumental facades, *polythyra* (pierand-door partitions), and large storage areas. It was an important administrative and religious centre in western Crete.

Component part 003: Malia

Malia, the third-largest Minoan palace complex in size, covers about 7,500 square metres and is located in a fertile

valley on the northern coast of Crete. Constructed around 1650 BCE on top of earlier structures, its well-preserved design includes storerooms, archives, and sophisticated water systems. Since it was not reoccupied after its abandonment, Malia offers a unique and undisturbed view of Minoan social and political organisation.

Component part 004: Zakros

Zakros, situated on the eastern coast of Crete, was a key trading centre connecting Crete with the rest of the Eastern Mediterranean, erected around 1500 BCE. The palace, covering approximately 3,500 square metres, includes a central courtyard surrounded by religious, administrative, and residential areas. Its Harbour Road and nearby port facilities highlight its importance in Minoan maritime trade.

Component part 005: Zominthos

The palace complex of Zominthos was established around 1700 BCE. Located at an altitude of about 1,200 metres in the foothills of Mount Psiloritis, it played a central role in ritual and economic activities related to mountain resource management. Covering approximately 2,150 square metres, the site features complex corridors, storerooms, and workshops built with local stone and timber. Its sophisticated architecture reflects the high level of Minoan craftsmanship and ingenuity.

Component part 006: Kydonia

Kydonia, situated on Kastelli Hill in the present-day city of Chania, was a major urban hub during the Neopalatial Period. While much of the site remains unexcavated, findings include monumental buildings adorned with frescoes, lightwells, and advanced drainage systems. In the Mycenaean era, Kydonia became a dominant centre of the trade network of Crete, as indicated on tablets written in Linear B script discovered at this component part.

The six component parts illustrate the emergence of complex urban centres that combined administrative, economic, and religious functions within a unified architectural and artistic framework. Each component part contributes uniquely to reflect the adaptation of the Minoan society to geography, resource use, and cultural exchange. The palatial centres feature advanced urban planning, monumental multi-storey structures, intricate water systems, and decorated interiors, serving as hubs of societal life. Together, they illustrate the cultural and economic interconnections of the Minoans across the Eastern Mediterranean and reflect a highly developed urban civilisation. Artistic achievements such as frescoes and finely crafted objects in gold, bronze, and clay underscore the sophistication and wealth of the Minoans.

The area of the six component parts totals 29.512 ha, with buffer zones totalling 1,586.923 ha.

These archaeological sites exemplify a remarkable prehistoric culture that flourished between 2800 BCE and 1100 BCE.

The strategic position of Crete in the Eastern Mediterranean enabled it to serve as a cultural and economic bridge between Europe, Africa, and Asia, fostering innovation and trade. During the 2nd millennium BCE, the Minoans emerged as a dominant maritime civilisation while developing a distinctive cultural identity. The nominated property highlights the zenith of this civilisation, showcasing its advanced societal organisation, artistic achievements, and architectural ingenuity.

Archaeological investigation of the nominated property began in the late 19th century, with the first excavations at Knossos (001) conducted in 1878. These initial efforts were followed by extensive research throughout the 20th century and into the 21st century up until recently. Excavations focused on uncovering the palatial centres and their associated artefacts, revealing insights into Minoan society, architecture, and culture. This continued archaeological work has been essential for understanding the rise and decline of the Minoan Civilisation, particularly during the Neopalatial period (ca.1700–1450 BCE). Although some excavations are ongoing, no new large-scale excavations are currently planned. The archaeological sites and their findings remain important sources for ongoing research into the ancient Mediterranean world.

While scholars today debate the precise nature of the occupation and use of these palatial centres, their interrelationships, and the political role they played at various points in Minoan history, it is evident they were central to Minoan society, functioning as administrative, economic, religious, and cultural hubs.

State of conservation

The nominated property consists of six archaeological sites which include the remains of several Minoan palatial centres. Most are largely intact, with original structures preserved in situ. While Kydonia (006) remains partially excavated, ongoing excavations and future conservation efforts aim to preserve and stabilise its exposed remains. Zominthos (005) has only recently been excavated and stabilisation and conservation work has been done while excavating and afterwards. Since their excavation, Knossos (001), Phaistos (002), Malia (003), and Zakros (004) have been continuously maintained, with minimal interventions. Nonetheless, it is important to note that extensive interventions were carried out at Knossos (001) in the 1920s under the supervision of archaeologist Sir Arthur Evans, including the large-scale use of reinforced concrete and the partial reconstruction of floors, architectural ensembles, frescoes, and other important parts of the complex. These widely known but muchdebated reconstructions of the Stepped Portico, Throne Room, and North Entrance are an irreversible part of the history of the palace complex.

Conservation measures focus primarily on stabilising and restoring damaged areas while avoiding extensive reconstructions beyond necessary stabilisation efforts.

Currently, all component parts except Kydonia (006) are fully fenced, with clearly marked boundaries defining their

legally protected areas. Maintenance efforts prioritise prevention and preservation, and no significant development threats have been identified that could negatively impact the nominated property. Larger-scale conservation initiatives are planned for Knossos (001) and Malia (003), including enhancements to site routing and visitor facilities. Overall, the general state of conservation of the nominated property is good, with specific measures focused on preserving exposed structures and maintaining the surrounding landscape.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressures, tourism, environmental risks, and natural disasters.

The primary potential threats include development pressures, particularly at Kydonia (006), where the archaeological site is located beneath the modern city of Chania. Although adequate protection measures are in place, it is recommended that a specific monitoring system be established to oversee permits and building activities in the area. At Knossos (001), the proximity to urban areas is well-managed through strict legal protection, with no significant developments anticipated. Due to their more remote locations, the Phaistos (002), Malia (003), Zakros (004), and Zominthos (005) component parts do not face any major threats from industrial or commercial development. Nevertheless, ICOMOS strongly advises that a Heritage Impact Assessment mechanism be developed and implemented in case such developments occur.

Tourism is another significant factor, with increased visitation, especially at Knossos (001) and Kydonia (006), potentially putting pressure on these archaeological sites. Improvements to visitor facilities are underway to better manage tourist flow and minimise impacts on the archaeological remains. Traffic restrictions have been implemented around Kydonia (006) to enhance the visitor experience. However, as tourism continues to grow, waste management challenges may arise, for which plans are in place at the more visited sites.

Environmental threats, including floods and wildfires, are actively being addressed through preventative measures. With the expected increase in risks related to climate change, these issues, particularly at Knossos (001) and Kydonia (006), require ongoing monitoring. Additionally, earthquake risks are present, and the archaeological sites are closely monitored for seismic activity that could affect their preservation. The risk from air pollution is minimal.

ICOMOS considers that the state of conservation is good and generally stable. However, ongoing monitoring of development pressures, tourism, and environmental risks, including climate change, will be essential to ensure the continued preservation of the nominated property.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Minoan Palatial Centres are the most authentic and representative expression of the Minoan Civilisation, showcasing a unique monumental architecture, an advanced urban planning, and a highly developed society.
- Often described as "the first advanced urbancivilization on the European continent", they reflect an early form of urban society with complex economic, administrative, and social structures, advancing architectural and artistic excellence in the Middle and Late Bronze Age.
- They provide significant material evidence of the organisation of a prehistoric civilisation based on agriculture, animal husbandry, and sea trade, and are key sources of the earliest European writing systems.
- The sophistication of Minoan architecture, with its grand palaces, courtyards, and complex layouts, demonstrates an early architectural standardisation that became a distinct style.
- The close relationship of the Minoans with their environment, as reflected in their art and the adaptation of palatial architecture to the natural landscape, showcases their understanding of and interaction with nature.
- Minoan legends and their associated myths have had a lasting impact on art and culture, continuing to inspire creativity across various fields and promoting ideals of peace, prosperity, and harmonious social life.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the monumental and standardised architecture; the advanced urban planning and hierarchical organisation; the works of art; the articulated worship system; the material evidence of agricultural and trade economies; the Minoan writing systems; and the long-lasting cultural and intellectual influence of Minoan legends.

Comparative analysis

The comparative analysis has been developed around the following parameters: architecture; morphological characteristics and construction; socio-political aspects; universal impact; and scientific value. It has examined properties within the Eastern Mediterranean and Near East inscribed on the World Heritage List, included in the

Tentative Lists of States Parties as well as other properties.

The comparative analysis evaluates the architectural and cultural heritage of ancient palatial complexes, emphasising their design, spatial organisation, construction techniques, and material use. It also considers the social, administrative, and religious functions these sites fulfilled, providing a framework to situate the Minoan palatial centres within the broader context of ancient complex societies in the region.

The analysis primarily considers properties associated with advanced Bronze Age civilisations, placing particular emphasis on the Minoan Civilisation in Crete and its interactions with contemporary societies such as the Mycenaeans, Hittites, and ancient Egyptians. These civilisations shared geographical and cultural contexts marked by extensive trade, technological exchange, and artistic influence, underscoring the significance of their palatial and urban centres in understanding the evolution of ancient societies.

Key sites in the analysis include the Archaeological Sites of Mycenae and Tiryns (Greece, 1999, criteria (i), (ii), (iii), (iv) and (vi)) and Hattusha: the Hittite Capital (Türkiye, 1986, criteria (i), (ii), (iii) and (iv)). These archaeological sites demonstrate a common use of monumental architecture for administrative, religious, and ceremonial functions, while also highlighting technological and artistic innovations. Architectural and organisational differences are also apparent. For example, Mycenaean palaces were fortified and militarised, while the Minoan palatial centres featured open labyrinthine designs centred on trade and religious practices.

Other archaeological sites in the comparative analysis, including Persepolis (Iran (Islamic Republic of), 1979, criteria (i), (iii) and (vi)) and Babylon (Iraq, 2019, criteria (iii) and (vi)), share a monumental scale and once served as centres of political and religious power, akin to the nominated property. However, differences in political structure and social organisation are evident, particularly in the Egyptian and Mesopotamian complexes, which were associated with centralised theocratic systems.

Near Eastern sites such as Tel el-Dab'a (Egypt) and Ugarit (Syria) are also included in the comparative analysis. They exhibit architectural and artistic similarities to the Minoan Palatial Centres, although they served different societal functions. The comparative analysis does not extend to sites beyond the selected geocultural region, as comparable centres with similar complexity and artistic expression are considered by the State Party to belong to entirely different contexts.

There are shortcomings in the comparative analysis. Using function as a comparative factor does not contribute effectively to the analysis. In addition, the analysis offers only two Mycenaean palaces for comparison, and significant contemporaneous settlements on the Aegean islands and Cyprus are absent. Finally, the rationale for

selecting the six component parts is not as well substantiated as would be desired. In the additional information of February 2025, the State Party explained that the selection ensures geographical balance, represents all Minoan chronological phases, and reflects different aspects of Minoan society. While Petras and Galatas were excluded due to incomplete excavations and limited infrastructure, Kydonia (006) and Zominthos (005) were included based on substantial research and conservation efforts. The response also clarified the distinct contributions of each site: Knossos (001) as a politicaladministrative hub; Phaistos (002) for early palace architecture; Malia (003) as an urban-palatial centre; Zakros (004) as a maritime gateway; Zominthos (005) as a high-altitude administrative site; and Kydonia (006) as a Mycenaean-era palatial entity.

ICOMOS nonetheless considers it has been demonstrated that the nominated property stands out among relevant comparatives in terms of architectural innovation, artistic achievements, cultural and religious practices, economic and trade networks, and urban planning and social organisation.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (i), (ii), (iii), (iv), (v) and (vi).

Criterion (i): represent a masterpiece of human creative genius:

This criterion is justified by the State Party on the grounds that the Minoan Palatial Centres exhibit monumental architecture, advanced urban planning, unique works of art of particularly high aesthetic quality and technical excellence, articulated worship systems, and the first European writing systems, making them key representations of the Minoan Civilisation as one of the great civilisations of the ancient world, often described as the first advanced urban civilisation on the European continent.

ICOMOS considers that the Minoan Palatial Centres exhibit remarkable architectural innovation, artistic sophistication, and complex urban planning. However, their extensive modern reconstructions, particularly at Knossos (001), raise concerns about authenticity. The reliance on reconstructions as part of the interpretation of the component parts complicates the ability to distinguish between original elements and later interventions, impacting their ability to be considered as direct and intact masterpieces of human creativity.

Furthermore, while the significance of these sites in early European urban development is acknowledged, the comparison with other contemporaneous civilisations suggests that the Minoan Palatial Centres were part of a broader cultural and technological exchange rather than wholly unprecedented.

The nominated property is a series of monumental buildings that reflect different aspects of the Minoan society. Each component part – despite some similarities – has a distinctive character, created through different processes. Collectively and individually, they cannot be considered an outstanding (complete, inventive or original) or landmark example of a movement or style that evolved within a culture; that is, not as a masterpiece of human creative genius.

ICOMOS considers that this criterion is not demonstrated.

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the Minoan Palatial Centres provide evidence of early urban development, showcasing monumental architecture, advanced technology, and a high level of artistic expression.

ICOMOS considers that the justification for criterion (ii) provides arguments that would fit better under criterion (iii). Hence, further information on whether any evidence of trade, diplomacy, and cultural exchanges has been discovered at the component parts, that could illustrate the role of Minoan Crete as a central hub for Mediterranean interaction during the Bronze Age was requested by ICOMOS in its interim report. In the additional information of February 2025, the State Party explained that the Minoan Palatial Centres were sites of intercultural exchange, facilitating trade, artistic influence, and technological diffusion across the Eastern Mediterranean. The State Party presented material evidence, including imported goods, shared religious motifs, and architectural similarities, to illustrate these interactions with Egypt, the Near East, and Mycenae. They also responded to ICOMOS's concerns regarding the hierarchical narrative, referencing recent research that suggests a more complex and less centralised socio-political structure. While reaffirming the role of the centres in transmitting artistic, technological, and administrative practices, information on the extent and nature of these exchanges in light of contemporary scholarship was not provided.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated property documents early economic systems, including agriculture and sea trade, as well as the development of the earliest known writing systems in Europe (Cretan Hieroglyphic and the Linear A scripts).

ICOMOS considers that the nominated property provides an exceptional testimony to the Minoan Civilisation, a prehistoric culture that has disappeared. The nominated component parts encapsulate the unique features of one of the first advanced civilisations in Europe, reflecting architectural innovations, complex administrative systems, artistic achievements, and religious practices. The Cretan Hieroglyphic and Linear A writing systems (and the influence of Linear A script on the Linear B script) the creative and administrative sophistication of the Minoans, while the distinctive features of the palatial centres, including central courtyards and elaborate decoration, underscore their transition to a centralised, stratified society. Despite debates about the continuity of traditions such as olive oil production, these centres offer unparalleled insights into Minoan social organisation, urban development, and economic activities, including trade with Egyptian and Mycenaean civilisations.

ICOMOS considers that this criterion is demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;

This criterion is justified by the State Party on the grounds that the nominated property, with its intricate layouts and standardised architectural elements, inspired the myth of the Labyrinth and reflects a distinct architectural style that had developed by the 2nd millennium BCE.

ICOMOS considers that the nominated property includes outstanding examples of Bronze Age architecture, demonstrating the advanced social, political, and administrative organisation of the Minoan Civilisation. Their labyrinthine planning, courtyards, storage systems, and sophisticated hydraulic installations highlight innovative architectural solutions and the functional integration of royal, administrative, and religious functions. These features, combined with distinct urban planning and construction techniques, illustrate the emergence of state-like organisations in the Eastern Mediterranean and thus reflect a significant stage in human history.

ICOMOS considers that this criterion is demonstrated.

Criterion (v): be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that the Minoan palatial complexes harmonise with their natural surroundings and use local materials such as stone, wood, and clay, showcasing a dynamic interaction between people and the environment.

ICOMOS considers that, while the architectural achievements of the Minoan civilisation demonstrate adaptation to local resources and strategic climate responsiveness, the justification for this criterion is not

sufficiently robust. The interactions between the Minoans and their environment, though highlighted as being significant, are often oversimplified and romanticised, lacking detailed analysis beyond artistic representations. The palatial centres, built upon earlier Neolithic structures, reflect advanced planning and resource utilisation, yet the connection between these features and the broader value of the nominated property remains tenuous

ICOMOS considers that this criterion is not demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that the legacy of the Minoan civilisation, including its myths, social ideals, and representations of women, has shaped artistic and intellectual thought through the ages.

ICOMOS considers that the legends associated with the Minoan civilisation such as the Minotaur and the Labvrinth have influenced Western literature, art, and cultural identity, but their direct and tangible association with the nominated property remains weak. Many of these myths may also reflect later Greek or Mycenaean reinterpretations rather than authentic Minoan traditions. Although the ideas of Pax Minoica (Minoan Peace) and the influence of the Minoan Palatial Centres on subsequent cultures are persistent, they are debated by experts for their historical accuracy and significance, as is the theory that Minoan women enjoyed a higher social status than other women in later civilisations. Restoration efforts at Knossos and artefacts associated with cultural practices do provide insights into Minoan identity, but the connection between the archaeological record and the legendary narratives remains ambiguous.

ICOMOS considers that this criterion is not demonstrated.

ICOMOS concurs with the identification of some of the proposed attributes by the State Party, particularly the architectural achievements, artistic expressions, and urban planning of the Minoan Palatial Centres. However, ICOMOS does not consider the Minoan legends, including the Minotaur, the Labyrinth, and Pax Minoica, as attributes of the proposed Outstanding Universal Value, as their direct and tangible association with the nominated property is not demonstrated. Furthermore, the prominence of women in Minoan art, though significant, requires further substantiation regarding its broader societal implications. Similarly, the integration of nature in Minoan art and architecture, while evident in decorative motifs and material use, does not clearly convey an exceptional interaction between humans and their environment in a way that substantiates the proposed Outstanding Universal Value.

ICOMOS considers that the nominated property meets criteria (iii) and (iv), but that criteria (i), (ii), (v) and (vi) have not been demonstrated.

Integrity and authenticity

Integrity

Integrity is a measure of the wholeness and intactness of the cultural heritage and its attributes. As a serial nomination, integrity is also a measure of whether the component parts individually and collectively contain all the attributes necessary to express in a substantial way the proposed Outstanding Universal Value of the nominated property as a whole, and how each component part contributes to that value.

While the Knossos (001), Malia (003), and Zakros (004) component parts are in excellent condition, considerations are being made regarding the Kydonia component part (006). As the State Party points out, Kydonia remains only partially excavated, and the full extent of the archaeological site has not yet been determined. Therefore, the boundaries of this component part are currently based on probabilities rather than complete archaeological data. Nevertheless, this should not overshadow the importance of Kydonia as an integral part of the Minoan heritage, and the State Party is encouraged to continue providing updates on the ongoing excavations and conservation efforts at this component part.

The overall integrity of the component parts is strong, as most are properly fenced and legally protected. Conservation efforts are focused on preserving the archaeological remains, with no harmful developments threatening the sites. Planned conservation work at Knossos (001), Malia (003), and Kydonia (006) further supports the integrity of the nominated property.

As for the integrity of the serial nomination, further clarification would have been advantageous regarding the exclusion of other palatial centres, such as Galatas and Petras, which were evidently omitted because of incomplete excavations and insufficient infrastructure. In the additional information submitted in February 2025, the State Party indicated that the exclusion of these two palatial centres is justified by significant shortcomings in terms of safety, visibility and research at this stage. However, the State Party also informed that their inclusion through a significant modification to the boundaries of the nominated property could be envisaged in the future if these issues are resolved.

ICOMOS considers that the integrity of the whole nominated series as well as the integrity of each of the component parts have been demonstrated.

Authenticity

The authenticity of the nominated property is generally well-preserved. Phaistos (002), Malia (003), Zakros (004), and Zominthos (005) are especially noteworthy for their minimal

intervention approaches and high degree of preservation. These component parts retain their original forms, designs, and materials, providing visitors with an authentic experience of the Minoan landscape and architecture. The agrarian settings surrounding these sites remain largely undisturbed, further enhancing their authenticity and connection to the Minoan era.

Knossos (001), though it faces challenges due to the extensive reconstructions carried out in the early 20th century by Sir Arthur Evans, still holds considerable historical and educational value. Despite the compromises in form and design, large portions of the site remain authentic, and the preservation of materials and substance further contributes to its authenticity. The setting of Knossos also remains largely intact, maintaining a strong link to its historic context.

Kydonia (006), with its continuous occupation and urban development, presents a more complex case, particularly regarding the authenticity of the setting. However, the authenticity of the excavated materials and design remains strong, and the possibility that Minoan remains are well-preserved beneath the modern city provides a promising foundation for future research and preservation efforts.

It is recommended that the State Party clearly distinguish between authentic archaeological remains and later reconstructions carried out in the early 20th century by Sir Arthur Evans to ensure the justification of Outstanding Universal Value is based on authentic material.

ICOMOS considers that the authenticity of the whole nominated series as well as the authenticity of each of the component parts have been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met.

Boundaries

There are no residents in the nominated property except for Kydonia (006), which is within urban Chania. The buffer zones have a total of 442 inhabitants, spread between Knossos (001), Phaistos (002), and Zakros (004), while Malia (003) and Zominthos (005) remain uninhabited.

The boundaries of the component parts align with protected zones designated under Greek law. The boundaries of each site are clearly demarcated, with Knossos (001), Phaistos (002), Malia (003), Zakros (004), and Zominthos (005) functioning as well-defined archaeological reserves. They are well-established, ensuring that the key attributes, including the palatial centres, are preserved and accessible for further research and public appreciation. The archaeological remains at Knossos, Phaistos, Malia, Zakros, and Zominthos are clearly outlined and protected by fences, providing a strong level of security and integrity for the sites. Kydonia, however, presents a different challenge, as much of the archaeological remains lie beneath the modern city. While the visible and excavated portions of the site are fenced, the full extent of the palatial

centre remains beneath urban development, making this a dynamic and evolving area for future study and conservation.

The buffer zones have been selected to preserve the settings and views that are integral to the values of the nominated property. ICOMOS considers that there are some opportunities to further refine these buffer zones. At Knossos (001), while the buffer zone is generally wellpositioned, slight adjustments could be made to ensure it is more clearly traceable on the ground by following existing roads, plots, and natural contours. At Phaistos (002), the current buffer zone could be extended to encompass additional views of the surrounding area, particularly to the north-east, the south-east, the west and south-west in order to further protect the context of this component part. The buffer zones at Malia and Zakros (003, 004) are mostly effective, but minor refinements in some areas could ensure greater traceability and alignment with the natural features of the landscape. The buffer zone at Zominthos (005) is adequate but could be refined to better follow the contours of the landscape.

In the additional information of February 2025, the State Party considered each recommendation proposed by ICOMOS and advised that critical parameters should be taken into account before implementing the proposed changes, such as the ownership status or protection designations already at play. For Knossos (001), the State Party indicated that it would be willing to undertake the proposed adjustments if the ownership status of the land plots surrounding the proposed buffer zone allow it. For Phaistos (002), the State Party is willing to adjust the boundaries of the buffer zone towards the east at a later stage, so as to have time to identify an adequate new boundary. The suggested changes for Malia (003) are not feasible at this stage as the proposed buffer zone is currently surrounded by privately-owned plots. Finally, for Zakros (004) and Zominthos (005), the State Party explained that the proposed adjustments were not deemed necessary at this stage since their broader environment is already protected under the designations of two UNESCO Global Geoparks (Sitia Geopark, 2015; Psiloritis Geopark, 2001). Nonetheless, the proposed changes for Zominthos (005) could be considered if ownership status allow it.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparison with relevant sites effectively demonstrates the significance of the nominated property. The integrity and authenticity of the nominated series is largely upheld, with most of the component parts well-preserved. While the Knossos component part (001) faces challenges due to extensive reconstructions carried out in the early 20th century by Sir Arthur Evans, its historical value remains significant. The ongoing excavation and conservation efforts at Kydonia (006) further contribute to the robustness of the nomination, though the full extent of the component part remains an area of potential concern.

Refinements to align the boundaries of the buffer zones with natural features on the ground at Knossos, Phaistos, Malia, Zakros and Zominthos (component parts 001, 002, 003, 004 and 005) would strengthen the overall protection of the nominated property while respecting its settings, and should be undertaken through minor boundary modification requests as soon as legal and practical parameters allow them.

4 Conservation measures and monitoring

Documentation

The documentation of the nominated property is extensive, supported by decades of archaeological research and scientific study. It includes detailed inventories on the form, function, and history of the archaeological sites, providing valuable insight into their construction, use, and eventual abandonment. The Ministry of Culture, in collaboration with foreign archaeological schools and the Archaeological Society of Athens, maintains comprehensive records on conservation, studies, and interventions. Digital tools, such as the "Hellenic Archaeological Cadastre" and 3D modelling, enhance the precision and accessibility of these records, which are essential for understanding the proposed Outstanding Universal Value of the nominated property.

Maintaining a detailed baseline of documentation is essential for future conservation, allowing for effective management of potential threats, such as environmental changes or human activities. The existing records, which include past interventions and their outcomes, will guide future conservation efforts. It is recommended that the digital documentation be expanded, particularly through the completion of 3D models for all component parts. Additionally, enriching museum collections with newly excavated artefacts will further contribute to the understanding of the nominated property. Collectively, these measures will support its long-term conservation.

Conservation measures

The conservation of the nominated property follows a structured approach, underpinned by detailed studies and continuous monitoring. A specialist architect conducted an assessment of the current state of conservation, and an inventory of conservation needs is included in the nomination dossier. The Ministry of Culture oversees the conservation efforts, ensuring adherence to international standards. A multidisciplinary Scientific Committee, established in 2001 specifically for the Knossos component part (001) and involving foreign archaeological schools, now provides a global approach to conservation with ongoing reviews and research for each of the six component parts.

Conservation work is funded through diverse sources, including the Ministry of Culture, foreign archaeological schools, national programmes, and the European Union. This diversified funding supports both immediate and long-term needs, covering regular maintenance and restoration projects, with an emphasis on stabilisation and

preservation of original materials. No reconstruction is planned, and all efforts comply with international conservation standards. While ongoing conservation is required, the nominated property remains in good condition, with clear plans and adequate resources for future work. ICOMOS requested clarification on the longterm conservation and risk preparedness strategies implemented by the State Party. In the additional information of February 2025, the State Party indicated that conservation relies on detailed restoration studies, with short-term plans in place, such as for Malia (003), under the Ministry of Culture. However, ICOMOS notes that while risk preparedness is addressed through national and sitespecific frameworks, with risk assessments and emergency response plans provided in the nomination dossier, a clearly defined, integrated long-term conservation strategy remains unspecified and climate change would need to be further addressed and should encompass the attributes of the proposed Outstanding Universal Value.

Monitoring

The proposed monitoring system for the nominated property, as outlined by the State Party, is a thoughtful and comprehensive framework aimed at ensuring the continued protection of the attributes that support the proposed Outstanding Universal Value. The system is built upon a set of well-defined key indicators ranging from institutional protection to monitoring natural disasters, climate change impacts, and human interventions. These indicators are designed to assess the state of conservation, integrity, and potential risks to the nominated property while incorporating a collaborative approach involving various stakeholders such as the Ministry of Culture, local authorities, and research institutions. This wide-reaching collaboration ensures that monitoring efforts are well supported and informed by expert input at multiple levels.

While the monitoring system is meticulously planned, it is important to note that the key indicators have not yet been applied in practice, and therefore no historical data is available for comparison. ICOMOS would recommend to execute the planned monitoring system as soon as possible. This would provide an opportunity for the State Party to implement the proposed framework and gather baseline data to establish a robust monitoring record. By doing so, the State Party will be able to track trends over time and address emerging challenges, ensuring the longterm preservation of the nominated property. Once in practice, this system will not only enhance the management of the nominated property, but also support the periodic reporting requirements, further contributing to the protection of the nominated property and ensuring its sustainable conservation.

ICOMOS considers that the documentation of the nominated property is adequate. While the conservation and monitoring activities applied to the component parts have helped maintain a good state of conservation to date, ICOMOS considers that an integrated long-term conservation strategy for the overall property and each component parts should be developed, and climate change would need to be further addressed and should

encompass the attributes of the proposed Outstanding Universal Value. ICOMOS also notes that the monitoring responsibilities are clearly defined, and that the monitoring system is well-developed to encompass all the attributes supporting the proposed Outstanding Universal Value, while facilitating the easy integration of its outcomes into the Periodic Reporting questionnaire. ICOMOS recommends the practical implementation of the monitoring system in order to effectively ensure the protection and conservation of the nominated property.

5 Protection and management

Legal protection

The nominated property is protected under Greek Law 4858/2021 "Sanction of the Code of Legislation for the Protection of Antiquities and Cultural Heritage in general", which ensures robust legal safeguards for both tangible and intangible heritage. The law designates special protection zones, including non-construction zone (Zone A) and regulated zone (Zone B). The Knossos (001), Phaistos (002), Malia (003), Zakros (004), and Zominthos (005) component parts are protected under Zone A, providing the highest level of legal protection. The Kydonia component part (006) is located in Zone B and Zone B1, where construction is permitted only with Ministry of Culture approval. ICOMOS considers that all the nominated component parts should be given protection under the same special protection zone regime (Zone A), and that a specific monitoring system to oversee permits and building activities in Chania, where Kydonia (006) is located, should be developed.

Buffer zones around the component parts are also well protected. The buffer zone for Knossos (001) is mostly in Zone A, with some areas pending clarification to become Zone B. The buffer zones at Phaistos (002), Zakros (004), and Zominthos (005) are fully designated as Zone A, while the buffer zone for Malia (003) is partially protected as Zone A (600 metres around the nominated property) and the remaining of the buffer zone is protected as Zone B. In Kydonia (006), the buffer zone around the Venetian defence works is Zone A, whereas other areas are Zone B.

The legal protection mechanisms are effectively implemented, with active management by the Ministry of Culture which owns five component parts (Knossos, Phaistos, Malia, Zakros and Zominthos – 001 to 005). The Ministry is also responsible for delivering construction permit in Zone B. The monitoring system is in place to ensure developments align with preservation goals, but is yet to be fully implemented. Buffer zones, apart from Kydonia (006), are generally well-protected, with effective safeguards for agricultural and natural areas. Overall, the legal framework is sound, contributing to the ongoing protection of the component parts.

Management system

The management system for the nominated property is designed to protect the key attributes of the proposed Outstanding Universal Value. The Ministry of Culture

oversees legal protection, permits, and the management of the five government-owned component parts, coordinating with other ministries and agencies to ensure a collaborative approach. The positive interaction among stakeholders demonstrates a shared commitment to preserving the nominated property. The management structure balances protection with responsible use and public engagement.

The State Party has informed that a Committee for the Implementation of the Management Plan will be established upon the inscription of the nominated property on the World Heritage List.

The management system is well-supported by a skilled staff that includes archaeologists, engineers, and conservators, with additional expertise brought on board for major projects. Training and capacity building are integrated, supported by universities and professional courses. Financial support is primarily from the Ministry of Culture, though additional funding is needed for large-scale projects. The management system seems adequate as proposed and effective resource allocation should be secured. However, the management plan, is not yet comprehensive enough nor fully implemented.

In its interim report, ICOMOS sought clarification on whether a structured framework for conducting Heritage Impact Assessments (HIA) had been developed or was being considered for planned infrastructure projects. In the additional information of February 2025, the State Party indicated that large-scale projects undergo heritage impact assessments if the need arises, with final reviews conducted by the Central Archaeological Council. However, it remains unclear whether there are standardised criteria for initiating an HIA and ensuring its integration at an early stage of project planning.

Site management committees, including local representatives, cultural authorities, and experts, will oversee the management and conservation efforts, ensuring they reflect the local context. European Union funding mechanisms, such as the National Strategic Reference Framework, support conservation and enhancement projects.

Visitor management

Visitor management strategies across the six component parts of the nominated property vary, based on the unique challenges at each. In Knossos (001), new entrance/exit zones and improved facilities are being implemented to manage the growing number of tourists. Timed entry slots introduced in 2024 have been effective in controlling crowding, particularly from cruise ship passengers, and spreading visits throughout the day.

In Phaistos (002), a new entrance in the buffer zone will improve visitor flow and accessibility, with work set to begin soon. The changes aim to enhance the visitor experience while preserving the integrity of the site.

The Malia, Zakros, and Zominthos component parts (003, 004, 005) are less visited, and current visitor levels are

manageable, though visitor numbers may increase, particularly with the upcoming opening of Zominthos (005) in mid-2025. In Kydonia (006), archaeological remains are integrated into the urban fabric of Chania, offering an opportunity to raise awareness of the cultural heritage and status of this component part.

ICOMOS requested clarification on differentiating original structures from 20th-century restorations at Knossos (001) and a unified tourism management strategy. The State Party confirmed in the additional information of November 2024 and February 2025 that digital tools, interpretive panels, and guided tours were designed to address this issue at Knossos. ICOMOS considers that a comprehensive tourism management plan should be developed to unify interpretation across the nominated property and should be integrated to the management plan.

Community involvement

The nomination process for the six Minoan palatial centres involved significant community engagement, with broad consultation of stakeholders including local authorities, government bodies, heritage organisations, archaeological institutes, and the scientific community. Their input, through feedback, studies, maps, and documentation, helped create a well-rounded nomination dossier and management plan. Regular communication, press releases, and publications have kept both local and national communities informed, fostering strong local interest.

Cultural events and awareness-raising activities such as the "Psiloritis Race" and "Minoan Feat" have engaged the local communities, linking them to Minoan heritage and promoting sustainable tourism, local craftsmanship, and traditions. These events continue to be central to community involvement.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection of the nominated property is strong, with comprehensive safeguards in place. However, the Kydonia component part (006) should be provided with the highest level of legal protection (zone A). The well-coordinated management system, led by the Ministry of Culture, involves local communities and ensures effective preservation of the attributes that support the proposed Outstanding Universal Value of the property. The management plan should be more comprehensive and fully implemented. It should be further developed to include detailed long-term conservation strategies, a risk preparedness strategy that further addresses climate change and encompass the attributes of the proposed Outstanding Universal Value for the overall property and each component parts, and a comprehensive tourism management Community involvement is robust, supported by cultural events and multiple sources of funding, ensuring long-term sustainability and local engagement.

6 Conclusion

The Minoan Palatial Centres which date back from 2800 to 1100 BCE, exemplify the Minoan Civilisation through their monumental architecture, advanced urban planning, and cultural innovations. Serving as administrative, economic, and religious hubs, they reflect the development of a hierarchical society and offer insights into the maritime networks, early writing systems, and the interactions of Minoans with other Mediterranean cultures.

ICOMOS appreciates the thorough research and documentation of the nominated property provided by the State Party. The nomination dossier is comprehensive, and the State Party has demonstrated a strong commitment to the conservation and protection of these important archaeological sites. Significant conservation efforts, particularly at Knossos, Phaistos, Malia, Zakros, and Zominthos (components parts 001 to 005), are commendable, and the continued dedication to preserving these archaeological sites for future generations is evident.

ICOMOS considers that the proposed Outstanding Universal Value is demonstrated on the basis of criteria (iii) and (iv). The overall conditions of integrity and authenticity of the nominated series have been met, although the authenticity of the Knossos component part (001) has been impacted by earlier reconstructions. The ongoing work at the Kydonia component (006) part is noted, but the full extent of this archaeological site remains to be determined.

Addressing the identified shortcomings, particularly regarding the authenticity of reconstructed elements carried out in the early 20th century by Sir Arthur Evans, the management, the tourism-related pressures, and risk preparedness will be crucial for ensuring the long-term preservation of these exceptional archaeological sites.

7 Recommendations

Recommendation with respect to inscription

ICOMOS recommends that the nomination of the Minoan Palatial Centres, Greece, be **referred back** to the State Party to allow it to:

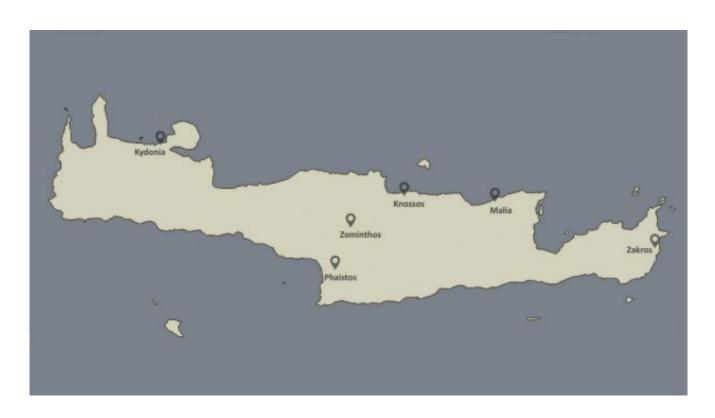
- Consider aligning the status of protection of the Kydonia component part (006) on the status of the other component parts (Zone A), to provide it with the highest level of legal protection, and establish a specific monitoring system to oversee permits and building activities in Chania, where Kydonia is located,
- Further develop the management plan to include:
 - detailed long-term conservation strategies, and a risk preparedness strategy that further address climate change and encompass the attributes of the proposed Outstanding Universal Value for the overall series and each component part,

 a comprehensive tourism management strategy including the presentation and interpretation of the overall series and each component part, ensuring that visitor management initiatives extend beyond individual sites to create a unified framework that balances accessibility with conservation;

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Refining and aligning the boundaries of the buffer zones with natural features on the ground for the Knossos (001), Phaistos (002), Malia (003), Zakros (004) and Zominthos (005) component parts, in order to protect the sites from visual impacts on their integrity and preserve the contextual relationship with their natural environment, through minor boundary modification requests once legal and practical parameters allow them,
- b) Clearly distinguishing between authentic archaeological remains and later reconstructions carried out in the early 20th century by Sir Arthur Evans to ensure that the justification of the proposed Outstanding Universal Value is based on authentic material.
- Applying in practice the key monitoring indicators, and gathering baseline data to establish a robust monitoring record,
- d) Expanding the digital documentation for all component parts,
- e) Continuing to provide the World Heritage Centre with updates on the ongoing excavations and conservation efforts at the Kydonia component part (006),
- f) Informing the World Heritage Centre of any intention to undertake or authorise major projects which may affect the proposed Outstanding Universal Value of the nominated property, in line with paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention. This should include, but not be limited to, development activities within the buffer zones, urban expansion around the Kydonia component part (006), and any construction work in proximity to the component parts, with a clear protocol for impact assessments and pre-emptive mitigation strategies,
- g) Developing and implementing a Heritage Impact Assessment mechanism for all development proposals, including but not limited to urbanisation, tourism infrastructure, and potential alterations related to the component parts, in accordance with the latest ICOMOS heritage impact guidelines.



Map showing the location of the nominated component parts

Art and Architecture in the Prehistory of Sardinia (Italy)

No 1730

1 Basic information

Official name as proposed by the State Party

Art and Architecture in the Prehistory of Sardinia. The domus de janas

Location

Province of Sassari
Province of Nuoro
Province of Oristano
Province of Sud Sardegna
Autonomous Region of Sardinia
Italy

Brief description

This serial nomination of twenty-six component parts comprises a selection of architectural and archaeological remains, spread across the island of Sardinia, which date between the 5th and 3rd millennium BCE and represent the testimonies of the daily life and death of the prehistoric Sardinian communities. The varied monumental structures of civil, worship, and funerary nature included in the nominated property reflect two cultural phenomena – hypogeism and megalithism – which converged on the island and gave birth to a multitude of architectural forms, including the characteristic funerary hypogeum – *domus de janas*.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of twenty-six *sites*.

Included in the Tentative List

9 April 2021, including thirty-five sites

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 20 to 31 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 24 September 2024 requesting further information about preventive conservation measures, conservation interventions, management, and

monitoring. On 18 October 2024, an additional request for information was sent to the State Party regarding the links between the component parts and how each component part contributes to the proposed Outstanding Universal Value as a whole.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the selection of the component parts, integrity, boundaries, conservation, management, and community involvement

Additional information was received from the State Party on 27 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report 12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated series includes twenty-six component parts, spread across the Italian island of Sardinia, dating from the Middle Neolithic to the Copper Age, up to the dawn of the Bronze Age (between the 5th millennium BCE and the end of the 3rd millennium BCE). They represent different types of architectural and archaeological structures, along with artistic representations, that testify to the local reinterpretations of two cultural phenomena - hypogeism megalithism - which developed simultaneously on the island and were both present in the broader cultural horizon of the Mediterranean basin and Europe more generally in the period under consideration. These structures also bear witness to the varied facets of life on the island, where the inhabitants adopted a sedentary way of life and subsistence strategies that included animal husbandry and farming. Multiple archaeological cultures have been identified within the period under consideration based mostly on pottery finds.

The component parts of the nominated serial property are the following:

- 001: Necropolis of Anghelu Ruju
- 002: Necropolis of Puttu Codinu
- 003: Necropolis of Monte Siseri or S'Incantu
- 004: Fortified complex of Monte Baranta

- 005: Necropolis of Mesu 'e Montes
- 006: Sanctuary of Monte d'Accoddi
- 007: Necropolis of Su Crucifissu Mannu
- 008: Domus de janas of Orto del Beneficio Parrocchiale
- 009: Domus de janas of Roccia dell'Elefante
- 010: Necropolis of Li Muri
- 011: Petroglyph Park
- 012: Dolmen of Sa Coveccada
- 013: Shelter of Luzzanas
- 014: Necropolis of Sant'Andrea Priu
- 015: Necropolis of Sa Pala Larga
- 016: Necropolis of Sos Furrighesos
- 017: Village of Serra Linta
- 018: Necropolis of Ispiluncas
- 019: Necropolis of Mandras/Mrandas
- 020: Necropolis of Brodu
- 021: Necropolis of Istevéne
- 022: Grotta Corbeddu
- 023: Menhir of Monte Corru Tundu
- 024: Shelter of Su Forru de is Sinzurreddus and the stone tool workshops of Sennixeddu
- 025: Archaeological Park of Pranu Mutteddu
- 026: Necropolis of Montessu

Based on function, three types of structures can be distinguished among the nominated component parts: civil structures, worship structures, and funerary structures. Only the most prominent ones are described below.

Civil structures

This category is represented by the caves, natural shelters, and open-air villages where communities lived and worked on a subsistence basis.

Among the structures within this category is the Grotta Corbeddu (component part 022) which is a cave whose archaeological stratification provides evidence of human presence lasting a millennium. The cave was reused several times during the Neolithic period. The most recent traces of a settlement date to the Early Bronze Age.

Open-air villages evolved over time from simple settlements to fortified villages. The Village of Serra Linta (component part 017) is the paradigmatic settlement from the Neolithic. It consisted of huts featuring basal dry-laid stone walls along the perimeters.

The later settlements, dating between the Copper Age and the end of the 3rd millennium BCE, were built in strategic locations, protected by nature, often surrounded by stout megalithic walls. They suggest a clear diversion from the Neolithic lifestyle and the need to defend the communities from local rivalries and threats by groups coming from beyond the island. Among the known fortified villages is the Fortified Complex of Monte Baranta (component part 004).

Worship structures

The Sanctuary of Monte d'Accoddi (component part 006) is the only known monumental structure of a specific worship nature in Sardinia and the Mediterranean basin. It consists of a truncated pyramidal altar equipped with a ramp. A menhir (a tall upright stone) and a menhir statue were erected nearby. The complex also features a hut settlement, still to be fully explored, dating back to the Neolithic and the Copper Age.

Menhirs are usually found on the island standing alone or in assemblages, often in alignments. The Menhir of Monte Corru Tundu (component part 023) is a stand-alone example, about six metres high. The Archaeological Park of Pranu Mutteddu (component part 025) features about sixty menhirs, some of which stand alone, some are in pairs, some in line-ups, and some in groups.

Funerary structures

This category of structures encompasses tomb circles, sometimes with associated menhirs, dolmens and gallery dolmens (allées couvertes), as well as domus de janas (chamber tombs).

The earliest forms of megalithic funerary structures are tomb circles. The most ancient examples known are at the Necropolis of Li Muri (component part 010), which dates to the Middle Neolithic and bears witness to the existence of interactions and exchanges with Corsica, France, and Catalonia.

Dolmens are three-stone structures consisting of two vertical stones fixed in the ground and a large covering slab to form a rectangular funerary chamber. They are usually stand-alone, like the Dolmen of Sa Coveccada (component part 012). Gallery dolmens feature multiple vertical orthostates arranged into walls; examples of these alongated structures can be found at the Necropolis of Li Muri (component part 010).

The *domus de janas* (which means "Houses of the Fairies", as these tombs are commonly called in Sardinian legends) are the most characteristic funerary structures of the Middle Neolithic to the Copper Age period in Sardinia. They are chamber tombs carved into the rock.

Often clustered, these collective tombs resemble houses for the living and are a very particular example of hypogeism.

The *domus de janas* included in this serial nomination (located in component parts 001, 002, 003, 005, 007, 008, 009, 011, 014, 015, 016, 018, 019, 020, 021, and 026) have been selected from about 3,500 structures scattered across the island. The sheer number of *domus de janas* preserved on the island allows to study the architectural development of their forms and to reconstruct the phases of construction, as well as to appreciate the rich repertoire of figurative decorative motifs. The complexity of their forms is said to be a result of later additions or renovations, as the structures were used over long periods of time; it is believed that additional rooms were added for necessity or ideological reasons, without a pre-established scheme.

Artistic characteristics are primarily expressed through the decoration of the domus de janas, executed using seven different techniques, sometimes combined, namely: sculpting, direct or indirect hammer engraving, linear technique or graffiti; polissoir (polishing) technique, dotting, painting directly on the wall or on plaster, and sculpted strips. The domus de janas included in the nominated property feature five types of figurative motifs: promotes or bucrania, comb-shaped, anthropomorphic, weapons and tools, and geometric figures.

The varied structures of the nominated series represent two cultural phenomena - hypogeism and megalithism. Hypogeism is believed to have originated in Sardinia during the first half of the 5th millennium BCE and spread to the surrounding Mediterranean islands, shores, continental Europe. It is represented in the nominated property primarily by the domus de janas, as well as caves and shelters that served as dwellings (settlement hypogeism). Megalithism appeared almost simultaneously on the island. The phenomenon is characteristic of the Neolithic communities in the western Mediterranean basin and in Sardinia it has been divided into four periods: the proto-megalithism of grave circles (Middle Neolithic); the monolithic megalithism of menhir standing stones (Late Neolithic, Copper Age); the trilithic megalithism of dolmen portal tombs (Late Neolithic, Copper Age); and the age of the "megalithic walls" (Copper Age). In some cases, hypogeism and megalithism in Sardinia mix and merge in the same monument. as seen in a tomb at the Archaeological Park of Pranu Mutteddu (component part 025).

The original area of the twenty-six component parts as proposed in the nomination dossier and before changes made to the boundaries totalled 320.86 ha, with buffer zones totalling 22,297.11 ha.

The megalithic and hypogeic structures included in the nominated property have been continuously used during the period under consideration. In some cases, their use and reuse continued beyond this period, even up to the present times. Generally, until the first centuries of the Nuragic civilisation, the sacred is linked to the worship of the ancestors, which is expressed by the creation of collective tombs, erecting menhirs or menhir-statues, and the use of magical-symbolic decorative motifs. Over the millennia, Nuragic, Punic, Roman and Christian structures of sacred nature have been added to the prehistoric ones or the latter converted to serve new purposes and new spiritual beliefs.

Dolmens do not appear to have been reused for funerary purposes after the Eneolithic period. The megalithic tombs at the Archaeological Park of Pranu Muttedu (component part 025) do not bear traces of reuse in the Early Bronze Age, while those at the Necropolis of Li Muri (component part 010) were not reused in the Middle Bronze Age. The use of *domus de janas* within the nominated property extends sometimes impressively throughtout the Middle Neolithic until the Early Bronze Age, as is the case of the Necropolis of Anghelu Ruju (component part 001) or the

Necropolis of Ispiluncas (component part 018). At least one domus de janas in the Necropolis of Sant'Andrea Priu (component part 014) was still used for funerary purposes in the Roman times while another was converted into an early Christian church, with additional tombs added inside during the Byzantine period.

In the contemporary times, some of the hypogea, shelters, caves, and dolmens were repurposed into shelters, sheepfolds, and barns, with changes made to their entrances and closures.

The early mentions of the megalithic and hypogeal structures appear in monastic records dating to the 11th to 13th centuries. Information about the monuments reappeared later in the 19th century, and in the 20th century the first scientific studies of antiquities on the island began. These included the first excavations in different necropolises (component parts 001 and 014). Since then, research on the archaeological and architectural remains of megalithism and hypogeism in Sardinia has developed intensively, with previously unknown monuments and artistic evidence being still discovered.

State of conservation

Conservation activities started in the early 20th century when interventions were mostly associated with archaeological excavations. Other interventions included consolidation of rock surfaces, structural stabilisation through anchoring and propping, construction of retaining walls, installation of rockfall nets, sheltering, construction of enclosure walls, fencing, and clearing of plants.

The first systematic condition survey was carried out in the process of compiling the current World Heritage nomination. The survey indicates that eighteen component parts suffer from flooding, percolation, and runoff events; sixteen are subject to structural and geotechnical instability; eleven have surface weed problems; ten have lacunae; and eight suffer from degradation of anthropogenic origin from historic or recent use. This condition survey is followed by interventions. Cleaning suggested (twenty-three component parts), water regulation (nineteen component parts), bonding and grouting (fourteen component parts), hydrological risk-mitigation operations (twelve component parts), and consolidation of detached parts (twelve component parts) are among the prioritised conservation interventions.

Despite statistical figures revealing issues related to the condition of the component parts, the stable nature of their materials and the fact that they have survived for millennia mean that no urgent measures have been identified for immediate implementation. The State Party and local authorities ensure overall monitoring and supervision of their condition. No critical situation has been reported or observed with regard to the component parts. The State Party has the necessary flexibility to access additional funds should an urgent conservation need arise.

The launch of the World Heritage nomination has attracted significant investment from all levels of the public sector,

resulting in intensification of conservation and promotion projects. In the additional information of November 2024, the State Party listed all the conservation and promotion activities along with the current state of their implementation and the timeframe of the projects. In addition, a table of additional resources secured after the submission of the nomination dossier was provided.

In the additional information sent in February 2025, the State Party further clarified that the technical personnel available to carry out the required interventions has been increased since the drafting of the nomination dossier. Besides public administration employees, universities and research centres (under ministerial concession), private companies, and individual external professionals listed by the Ministry of Culture have been involved in activities related to the conservation of the nominated series.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good overall.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are natural disasters, neglect, and irresponsible visitation.

The Fortified complex of Monte Baranta (component part 004) and the Necropolis of Sos Furrighesos (component part 016) are exposed to very high geomorphological hazard levels. All component parts are located in mediumto high-risk fire areas but are safe due to the risk control and fire prevention measures in place. Because of climate change, flooding is a growing threat to component parts 001, 006, and 015. Extreme temperature fluctuations and heat waves may cause long-term deterioration of the materials of the nominated property.

To address these issues, risk analyses have been conducted, and risk preparedness protocols have been put in place. Many consolidation and preventive interventions for the vulnerable elements of the component parts have been planned and implemented. Disaster prevention has been integrated into the local and regional systems.

Due to their remote locations, some component parts suffer from neglect. Animals occasionally seek shelter in the tombs, causing damage to the carved motifs and polluting the spaces. To solve the problems, the State Party started fencing the sites and implemented measures to strengthen their management and maintenance.

Erosion, vandalism, and deliberate removal of rock carvings are the negative effects of tourism. As the expected World Heritage designation may bring more visitors to the nominated property, the related risk of damage to the structures may increase.

In the additional information of November 2024, the State Party indicated that it sees no issue with excessive tourism, stating that the number of tourists at the most visited sites is very far from levels that could have a detrimental impact. In addition, projects for diverting tourists to less-visited sites, constructing replica tombs, and developing online and virtual reality presentations are in progress to reduce the concentration of visitation at the most popular sites. ICOMOS also observes that protective doors have been installed at the entrances of some important tombs. With these collective efforts, the impact of tourism on the nominated property can be controlled.

ICOMOS considers that the state of conservation is overall good and that factors affecting the nominated property are under control.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated series provides a window into the daily life of the prehistoric Sardinian communities that settled on the island between the 5th and the 3rd millennium BCE and erected monumental structures of civil, funerary and magical-worship nature.
- The selected architectural and archaeological remains constitute the most representative examples of the local reinterpretations of two cultural phenomena that affected the Mediterranean basin, and Europe more generally, in the Middle Neolithic to the Copper Age, namely megalithism and hypogeism, showcasing the skills, knowledge and beliefs of the populations that created them.
- The similarities between the architectural structures and artistic manifestations on the island and those of European and Mediterranean contexts testify to interactions and exchanges between the inhabitants of Sardinia and the outside communities, within a common cultural horizon characterised by megalithism and hypogeism.

Based on the nomination dossier and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as tangible and intangible attributes. The former include the megalithic and hypogeic structures, their locations, functions, construction techniques, layouts, plans, types of access, and decorative repertoire. The latter comprise cultural phenomena of hypogeism or megalithism, the process of reuse and repurposing of structures, sense of place, toponymy, and oral heritage.

ICOMOS notes that the current nominated series does not depict the full picture of the prehistory of Sardinia as was initially intended in the nomination dossier. As the scarcity of scientifically investigated settlements makes it difficult to reconstruct some aspects related to social organisation and daily life of the local communities, the selected component parts reflect much more the funerary practices of the populations over two millennia. Moreover, the contribution of the megalithic sites to this aspect of the nominated property appears to be less significant than that of the numerous typical hypogeal structures, known as the *domus de janas*.

ICOMOS considers that the domus de janas, with their diverse layout patterns, rich decorative art and symbolic expressions, represent pioneering architectural forms and as such demonstrate a strong potential to justify Outstanding Universal Value. However, a revised series would need to be proposed by the State Party, with a refocused narrative that would retrace the history of the funerary practices of the prehistoric communities of Sardinia, their evolutions and changes over time under the influence of ideological or other developments, as evidenced by the varierty and complexity of forms of the domus de janas, used over long periods of time. Should the State Party propose a new selection of component parts, it should ensure that each of them individually contributes in a substantial way to the proposed reformulated Outstanding Universal Value, as required by paragraph 137 of the Operational Guidelines for the Implementation of the World Heritage Convention, and that the cultural, social or functional links that unite them over time are clearly identified.

The State Party explained in the additional information of February 2025 that the parameters used to select the component parts of the current nomination are the variety of architectural types and symbolic motifs documented in the *domus de janas*, the choice of location of the structures and the configuration of their plan. ICOMOS considers that these parameters do not sufficiently demonstrate how these different dimensions reflect aspects of the funerary practices of the Neolithic and Copper Age populations, beyond their architectural/structural significance.

Comparative analysis

The comparative analysis has been developed around three parameters: civil structures, worship structures, and funerary structures. It has examined properties within the region inscribed on the World Heritage List, included in the Tentative Lists of States Parties as well as other properties.

Twenty-one properties on the World Heritage List and five on the Tentative Lists dating from the early Palaeolithic to the Bronze Age (35,000 BCE-100 CE) are compared with the nominated series. Comparisons are first made with similar sites on the island of Sardinia, followed by those in Italy, and finally in sixteen other countries in the geocultural region of the Euro-Mediterranean area, which includes Europe and North Africa.

Caves and shelters, outdoor villages, and fortified villages are compared with other sites in Italy and other countries under the parameter of civil structures.

Under worship structures, menhirs and ritual circles are compared to similar structures.

Extensive comparisons are made for the funerary structures, under the themes of megalithic graves, hypogeal tombs, and a synthesis of hypogeism and megalithism.

The selection of the component parts was made according to the parameters of representativeness, state of conservation, architectural types, relationship with the landscape, and visual-aesthetic integrity.

ICOMOS considers that the geo-cultural area and the chronological framework defined by the State Party are appropriate, and the logic of the comparisons is sound. ICOMOS considers, however, that the methodology adopted by the State Party is inadequate. Comparative analysis should be made using the nominated series as a whole, not individual component parts, against other properties. Only in this way can the significance of the nominated property as a whole be established.

ICOMOS considers that the exceptionality of the nominated property beyond the borders of Sardinia has not been established. ICOMOS considers, however, that the comparative analysis shows that the nominated architectural category of *domus de janas* could potentially justify consideration for the World Heritage List.

ICOMOS does not consider that the comparative analysis justifies consideration of the current serial property for the World Heritage List; however, the nominated architectural category of *domus de janas* could potentially justify consideration for the World Heritage List under a revised series

Criteria under which inscription is proposed

The property is nominated on the basis of cultural criteria (ii), (iii) and (vi).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the different monumental categories and the related decorative artistic expressions of the pre-Nuragic cultural system of the 5th to 3rd millennium BCE are concrete manifestations of the interactions and exchanges that occurred between the peoples settled in Sardinia and the European and Mediterranean communities, as evidenced by the spread of hypogeal and megalithic structures across the region.

ICOMOS considers that the argument put forward by the State Party does justify the existence of an interchange

with regard to hypogeism and megalithism between the Sardinian populations and the European and Mediterranean communities between the 5th and 3rd millennia BCE. However, ICOMOS considers that the reasons why this interchange, as reflected by the nominated property, is significant in the geo-cultural or global context are not clearly established. Furthermore, the outcomes of this interchange have not been specified, nor have the subsequent influence of the outcomes in the geo-cultural region been demonstrated.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated property is an exceptional testimony to the cultural system that characterised prehistoric Sardinia in the long period of time between the Middle Neolithic and the Copper Age, until the Early Bronze Age (between the 5th and 3rd millennia BCE), as manifested by the villages, funerary structures, and material productions used for civil, worship, and funerary functions. The monumental art reflects the spiritual world of the Neo-Eneolithic communities, connected to the cult of fertility and an otherworld. The artistic production stopped at the beginning of the Bronze Age, testifying to the strong cultural change brought about by the beginning of the Nuragic civilisation on the island.

ICOMOS considers that the argument put forward by the State Party has successfully established the significance of the nominated series in the history of Sardinia. The component parts are the most representative examples of megalithic and hypogeal structures erected on the island between the 5th and 3rd millennium BCE. They collectively illustrate many facets of the life and death of the prehistoric Sardinian communities. ICOMOS considers, however, that the proposed justification for this criterion has not established the supra-national significance of the nominated series in the relevant geo-cultural region. Accordingly, ICOMOS does not consider that this criterion has been demonstrated for the current nomination.

Nonetheless, ICOMOS considers that the *domus de janas* documented in Sardinia represent the largest corpus of this particular type of funerary structure in the Mediterranean Basin and Europe developed during the Late Prehistory. Showcasing a complete set of structural types, clear development trajectory, and extremely rich decorative art, they provide invaluable information on the siting, planning and design of the tombs, excavation technology, tools, specialised labour involved, the belief system, the cult of the dead and ancestors, and other burial customs. They are therefore an exceptional testimony to a very particular funerary tradition in human history, which disappeared with the arrival of the Nuragic civilisation on the island in the 17th century BCE.

Therefore, ICOMOS considers this criterion has the potential to be demonstrated on the basis of a revised narrative and reduced series refocused on the significance of the *domus de janas*.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that the *domus de janas* and other prehistoric evidence are part of the historical memory of Sardinia evoking myths and legends that still survive in the cultural tradition of the island. The *domus de janas*, "Houses of the Fairies", in particular have always been a part of the collective imagery of the population and have been mentioned since the 14th century in literary sources in the Sardinian language. The *domus de janas*, being at the centre of a long-lasting oral tradition, have fascinated both Sardinian and foreign writers, according to the State Party.

ICOMOS considers that, on the one hand, intangible heritage is not associated with the entire nominated series, but only with the domus de janas. On the other hand, while the "Houses of the Fairies" have long been a part of the collective imagery of the island, this type of association and similar legends are found throughout the region and beyond; hence the outstanding significance of the legends and other intangible associations of the domus de janas has not been adequately demonstrated in a geo-cultural or global context.

ICOMOS considers that this criterion is not demonstrated.

Based on the above analysis, ICOMOS considers that only the funerary tradition of prehistoric Sardinia associated with particular hypogeal structures – *domus de janas* – can be seen to have a potential outstanding universal significance. Subsequently, the potential attributes that directly and tangibly reflect this funerary tradition could include the *domus de janas*, together with their natural settings and association with the contemporary settlements.

ICOMOS considers that, as proposed, the nominated property does not meet criteria (ii), (iii), and (vi). However, the nominated property has the potential to justify criterion (iii) if the narrative and the series are revised to include only the *domus de janas*.

Integrity and authenticity

Integrity

The integrity of a nominated property is a measure of the completeness or intactness of the attributes that convey its proposed Outstanding Universal Value. For a serial nomination, integrity is measured at two levels: the nominated property as a whole and individual component parts.

ICOMOS notes that due to scarcity of scientifically investigated settlements, the selected component parts reflect much more the funerary practices of the populations over two millennia, rather than the full picture of the prehistory of Sardinia as it was intended to be presented in the nomination dossier. Moreover, the contribution of the megalithic sites to this aspect of the nominated property appears to be less significant than that of the numerous typical hypogeal structures, known as the *domus de janas*. Hence, not all the component parts contribute to the proposed Outstanding Universal Value

The parameters that were used by the State Party to select the component parts, as explained in the additional information of February 2025, do not sufficiently specify how the architectural types and symbolic motifs documented in the *domus de janas*, the choice of location of the structures and the configuration of their plan reflect aspects of the funerary practices of the populations in the Neolithic and Copper Age, beyond their importance at the architectural/structural level.

Regarding the integrity of individual component parts, ICOMOS notes and welcomes revisions to boundaries that are ongoing at two necropolises. The Tomba Branca (Tomb X) in the Tennero necropolis will be included in the Petroglyph Park (component part 011) as it contains Neolithic petroglyphs that appear to be of great archaeological significance; and the Necropolis of Ispiluncas (component part 018) will be expanded to encompass the tombs located in the northwest part of the necropolis, so as to achieve homogeneity across the entire necropolis.

Since the criteria for justifying the proposed Outstanding Universal Value of the current nominated series have not been demonstrated, attributes of Outstanding Universal Value cannot be identified and integrity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated. However, a refocused narrative on the significance of the domus de janas could have the potential to demonstrate Outstanding Universal Value on the basis of criterion (iii) and meet the conditions of integrity based on a reduced nominated series.

Authenticity

The authenticity of the nominated serial property is based on its cultural values being truthfully and credibly expressed through its attributes, and the way in which these attributes convey the proposed Outstanding Universal Value. These attributes include forms and designs, materials, and original construction and decorative techniques.

Throughout the millennia, many modifications and repurposes of the chamber tombs of *domus de janas* occurred, such as converting the space into a church (component part 014). Some activities had impact on the authenticity of some component parts, such as the nearby road affecting the setting of the *Domus de janas* of Roccia

dell'Elefante (component part 009). As indicated by the State Party in the additional information of November 2024 rerouting the roads away from the sites will be completed in August 2025.

Since the criteria for justifying the proposed Outstanding Universal Value of the current nominated series have not been demonstrated, attributes of Outstanding Universal Value cannot be identified and authenticity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated. However, a refocused narrative on the significance of the domus de janas could have the potential to demonstrate Outstanding Universal Value on the basis of criterion (iii) and meet the conditions of authenticity based on a reduced nominated series.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the current nominated series as a whole and of the individual component parts have not been met. However, these could have the potential to be met on the basis of a reduced series and refocused narrative on the *domus de janas*.

Boundaries

There are no permanent inhabitants living in the nominated property. There are 5,258 inhabitants living in the buffer zones.

The boundaries of the component parts have been demarcated following the extent of the archaeological protection constraints. The boundaries of the protected areas therefore overlap with the boundaries of the cadastral parcels concerned and, as a result, do not always follow physical or topographical elements.

The boundaries of the buffer zones are based on a visual analysis of the territory surrounding each component part to ensure protection of the scenic layout and the views to and from the monumental complexes. They take into consideration the physical and topographical elements that are easily identifiable on the ground, such as main and secondary roads, inter-estate paths, fences, and natural elements such as river and stream beds, ridges, and watersheds.

In some cases, given the proximity of some monumental complexes, two component parts have been included within a single buffer zone. There are therefore twenty-two buffer zones for twenty-six component parts. The proposed boundaries were defined through a process involving several stages and based on a number of parameters. Their appropriateness was assessed in relation to the landscape, cultural and environmental features, as well as other data such as the land registry, the boundaries of natural parks and environmental reserves, the boundaries of other UNESCO sites, the protection constraints imposed by the Ministry of Culture, the current urban/landscape planning instrument, and other constraints defined at the municipal level.

ICOMOS notes that the boundaries of component parts 011 and 018 are being enlarged.

ICOMOS considers that the rationale behind the boundary demarcations is sound and the delineated areas provide the component parts with adequate legal protection, while the buffer zones offer an additional layer of protection to the nominated property.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis does not justify consideration of the nominated serial property as currently proposed for the World Heritage List. Criteria (ii), (iii), and (vi) have not been demonstrated, and the conditions of integrity and authenticity have not been met at this stage. The current nominated series does not depict the full picture of the prehistory of Sardinia as was initially intended in the nomination dossier. As pointed out, the scarcity of scientifically investigated settlements makes it difficult to reconstruct some aspects related to social organisation and daily life in Late Prehistory Sardinia. However, the funerary field is better known, evidenced by numerous typical hypogeal structures, the domus de janas, often used over millennia. ICOMOS considers that the nominated property could have the potential to justify Outstanding Universal Value on the basis of criterion (iii) if the narrative and the series are revised and focused on the funerary practices of the prehistoric communities of Sardinia, their evolution and changes over time under the influence of ideological or other developments, as evidenced by the variety and complexity of forms of the domus de janas, used over long periods of time.

4 Conservation measures and monitoring

Documentation

While most of the component parts have been the subject of research, excavation, and restoration and have thereby accumulated a large amount of documentation at various levels, comprehensive documentation of the nominated property was first achieved during the creation of the current nomination dossier. This comprehensive documentation has resulted in a higher level of consistency and homogeneity of information. The outcome is adequate for future management of the nominated property, including monitoring.

Part of the graphic and photographic documentation related to the nominated property is kept at the archives of the two Superintendencies in Sardinia, the Central Institute for Catalogue and Documentation in Rome (Ministry of Culture), and the headquarters of the *Centro Studi Identità* e *Memoria* (CESIM/APS) in Sardinia. In 2017, the Autonomous Region of Sardinia catalogued the prehistoric monuments and artefacts of the island, and the result was published as a corpus of Palaeolithic, Mesolithic, Neolithic, Eneolithic and Early Bronze Age antiquities and architectural artefacts. The contents of this catalogue have

also been published in the General Catalogue of Cultural Heritage of the Ministry of Culture.

Scientific research on the prehistory of Sardina has been undertaken for over four decades, and recently, the ongoing research has identified many previously unknown monuments and artistic evidence. The State Party is encouraged to continue scientific research so as to gain better knowledge about the daily life of the Sardinian communities in the 5th and 3rd millennium BCE.

ICOMOS considers that the comprehensive documentation associated with the nominated property is adequate. Being a serial nomination, it is recommended that a centralised repository be established to host all the relevant documents and that these be accessioned and maintained according to accepted archival standards and best practices.

Conservation measures

Active conservation measures include legal protection, management, maintenance, conservation interventions, and monitoring. Legal protection is in place and enforced. Management bodies for all the component parts have been established to manage and maintain the nominated property.

Maintaining the proposed component parts has been challenging. Most of them are scattered in rural areas. unattended, and accessible without any protection or management measures in place, resulting in various forms and degrees of deterioration and degradation, as well as safety and security issues. The State Party indicated in the additional information of November 2024 that nineteen component parts have been fenced, and fencing the remaining ones is in progress. More than fifty-three percent are now equipped for visiting, basic management functions having been put in place. ICOMOS requested in its interim report an update on the progress made as regards the dayto-day management and monitoring of the domus de janas sites that are located in the countryside. The State Party responded in February 2025 that their location in the countryside was seen as a positive factor; protection and control in the territory are enforced by the Superintendencies and local administrations and are complemented by the Sardinian Forestry Environmental Surveillance Corps (CFVA), the Carabinieri Department for the Protection of Cultural Heritage, the Barracelli rural squads, and rural guards hired by the Municipalities of Anela, Olmedo, Oniferi, Porto Torres and Sedilo.

Since the submission of the nomination dossier, several conservation interventions listed in the short-term action plan of the management plan have been carried out, under the direct supervision of the Superintendencies of Cagliari and Sassari, which are the local competent bodies responsible for the protection, conservation, and research of cultural assets. All intervention protocols and regulations concerning heritage are standardised and regulated, and closely adhere to internationally accepted guidelines and doctrines. There are several conservation interventions planned to be undertaken in the next three to four years.

These will be implemented in an organised manner, reinforced by an increased number of professionals.

Research has been carried out and funds are in place to address the issues of water percolation and biological attack at some component parts.

ICOMOS considers that the conservation measures in place are adequate and effective.

Monitoring

Monitoring is conducted at two levels: the individual component parts and the nominated series as a whole. At the level of the individual component parts, as indicated in the additional information received in November 2024, the daily control and monitoring is undertaken by the Superintendence of Archaeology, Fine Arts and Landscape for the Provinces of Sassari and Nuoro, and the Superintendence of Archaeology, Fine Arts and Landscape for the Metropolitan City of Cagliari and the Provinces of Oristano and Sud Sardegna, with the support of local authorities.

At the nominated series level, a set of monitoring indicator has been designed, comprising forty-one indicators that are categorised into three groups: archaeological monuments. areas. and contexts: environmental. landscape, and territorial factors: and recognition. participation, and dissemination. The frequency of monitoring is between once a year and once every six vears. The monitoring is carried out by the CESIM/APS. which is responsible for the scientific aspect of the nomination, and is supported by an interdisciplinary scientific coordinating committee. The team includes the technical staff of the Superintendencies, professors. researchers at the Universities of Cagliari and Sassari. and independent contributors, who will also be responsible for collecting data from third parties, collating it in the database, and interpreting performance. In particular, the CESIM/APS will be the entity responsible for collecting and storing all information regarding site monitoring, with the support of the Department of Civil, Environmental, and Architectural Engineering of the University of Cagliari and the University of Sassari, under the surveillance of the peripheral bodies of the Ministry of Culture.

ICOMOS considers that the frequency of monitoring activities is low, with the most frequent ones being only once a year. ICOMOS is also concerned about the lack of connection between monitoring and decision making. In the additional information of November 2024, the State Party indicated that the monitoring of the nominated property as a whole will be carried out by the same team that carried out the survey of the different situations at the time the nomination dossier was drafted, and the frequency of monitoring will be decided by two factors: change in the state of the assets (as a result of new archaeological excavations or restoration activities, for example); and variability or occurrence of risk factors, such as extreme weather events, fires, instability, etc.

In addition, ICOMOS notes that the current monitoring indicators are mainly used for statistical purposes, such as the number of sites negatively affected, and that data is only collected between one to three years. Some monitoring activities are also of limited benefit, such as monitoring changes in average annual air temperature or CO2 emissions rather than measuring temperature fluctuations or acid precipitation at sites. ICOMOS considers that monitoring indicators should be designed to assess the conditions of the component parts, and that monitoring results should be communicated in real time so that they can be taken into account in the decision-making process. Furthermore, ICOMOS is particularly concerned about the day-to-day monitoring of the domus de janas sites that are located in the countryside, as no information has been provided on the monitoring indicators designed for each domus de janas, nor on how monitoring is carried out on a daily basis, who is responsible for conducting these monitoring activities, and to whom the the results are reported.

ICOMOS considers that the current monitoring system is inadequate at this stage. ICOMOS considers that a small-scale monitoring system tailored to each *domus de janas* should be developed, with a detailed set of monitoring indicators dedicated to accessing the conditions, development trends and rate of affecting factors of the sites, together with implementation arrangement on a daily basis.

ICOMOS considers that the level of documentation is adequate and can be used as baseline information for monitoring. The conservation measures in place are effective. In the framework of a potential reduced series, small-scale monitoring systems tailored to each *domus de janas* should be developed and integrated into daily management so as to improve the effectiveness of the system. In addition, ICOMOS considers that it would be advisable that the overall monitoring system is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

Ownership of the nominated series is both public and private.

The legal instruments for the protection of the nominated property include the Constitution and the Special Statute of the Autonomous Region of Sardinia, international agreements signed by the State Party, European Union rules and regulations, State laws, in particular the Italian Code of Cultural Heritage and Landscape (Legislative Decree 42/2004 as amended and supplemented), regional rules, and national, regional, and local government regulations.

The Constitutional Law is the uppermost legislation that provides legal underpinning for the protection of the nominated property. Article 9 stipulates that the State Party

protects the landscape and artistic heritage of the nation. Article 117, as amended in 2001, regulates the legislative power, which is only granted to the State with regard to the protection of cultural heritage, while the promotion of cultural heritage is a concurrent responsibility with the regional authorities.

The main State legislation on cultural heritage is the Code of Cultural Heritage and Landscape. It incorporates, unifies, and integrates all previous laws on the protection, conservation, and promotion of Italian archaeological, historical, architectural, environmental, and landscape heritage. It assigns the functions for protection to the Ministry of Culture. All the component parts are included in the category of archaeological heritage and are protected by this law. Architectural elements and landscapes are also subject to the same legal protection. Based on this law, compatible use must be guaranteed, and research activities and archaeological investigations are reserved for the State. Legislative Decree 36/2023 prescribes preventive archaeology for assessing the impact of public works on the archaeological heritage.

The Code of Cultural Heritage and Landscape (Legislative Decree 42/2004 as amended and supplemented) and Urban Planning Law No. 1150 of 1942 regulate planning power for the protection of cultural heritage. For the sites within a protected natural area, Law No. 394 of 1991 regulates the establishment and management of such areas.

In addition, the European Union's Natura 2000 network of protected ecological areas takes into account economic, social, cultural, regional, and local peculiarities and recognises the value of areas where the centuries-old presence of humans and their activities has made it possible to maintain a balance between anthropic and natural activities. Seven component parts (013, 014, 015, 016, 017, 018, 022) are located in the Natura 2000 network.

In Sardinia, the Regional Landscape Plan, Provisional Hydrogeological Basin Structure Plan, Territorial Coordination Plan, and Municipal Urban Plans are the main planning tools for the protection of the nominated property.

The Italian Ministry of Culture is the senior governmental institution responsible for implementing the Code of Cultural Heritage and Landscape. It has central and peripheral offices, the latter including the Superintendencies who are responsible for protection, and the Regional Directorates of Museums who are in charge of promoting and managing museums and national historic sites. The Regional Secretariat of the Ministry is responsible for coordinating the activities of the peripheral structures under the central Directorates General.

The role of the two Superintendencies on the island is essential for the protection and management of the nominated series. Their responsibilities include all the protection activities in their territory, as well as knowledge of the archaeological, architectural, historical, artistic, ethno-anthropological, and landscape heritage;

cataloguing functions; investigation of verification measures and declaration of cultural interest (restrictions); maintenance and restoration activities; authorisation (with specific prescriptions) and control of actions of any kind on the protected properties; research activity on cultural and landscape heritage; promotion of studies, research, cultural initiatives, and training by themselves and in collaboration with the regional authorities, universities, and cultural institutions; authorisation of the loan of works and movable finds for exhibits or exhibitions; and functions of the export office

Specifically, the Superintendence of Archaeology, Fine Arts and Landscape for the provinces of Sassari and Nuoro is responsible for the protection of component parts 001 to 016 and 020 to 022, while the Superintendence of Archaeology, Fine Arts and Landscape for the metropolitan area of Cagliari and for the provinces of Oristano and Sud Sardegna is responsible for the protection of component parts 017 to 019 and 023 to 026. In addition, the Sanctuary of Monte d'Accoddi (component part 006) is on the list of the network of museums and places of national culture, therefore the Regional Directorate of Sardinia Museums is responsible for its promotion.

Management system

The current management system is a network of stakeholders coordinated by the Centro Studi Identità e Memoria (CESIM/APS), the initiator of this World Heritage nomination. In the future a more robust management system, called the governance system by the State Party, will be established, as indicated in the management plan. In this future management system, a management committee will be at the core and will be supported by participating and affiliated members. The management committee will be comprised of the CESIM/APS, the Superintendencies, the Autonomous Region of Sardinia, the local authorities governing the territories where the nominated property is located, and the institutions (in various capacities: honorary, effective, etc.) that are willing and able to participate in the governance. The participating members will include all local authorities in the various buffer zones, and contributors who are committed to support the actions and operation of the nominated property, either financially or in-kind. The members will all be participants in the current network and public or private bodies that contribute to supporting specific actions or initiatives. This system will be governed by an elected board of directors reporting to a General Assembly that will be an expression of the wide range of stakeholders and territorial operators involved. The network of municipalities and operational units will facilitate coordination and operational tasks in site management.

This management system had not been formed by the time the nomination dossier was submitted. In the additional information supplied in November 2024, the State Party indicated that the system will be established before the nominated property is inscribed on the World Heritage List. The State Party further indicated in additional information of February 2025 that at the last technical round table with all stakeholders, held on February 2025, it was decided to set

up the governance according to the "Participation Foundation" formula and to accelerate the entire establishment procedure.

ICOMOS considers that the current management system relies on the existing legal and administrative arrangements, which could serve the basic needs for managing the component parts individually. ICOMOS considers, that in a World Heritage context, a serial property, although comprising many component parts, should also be treated as a single entity and subsequently protected, managed, presented and interpreted as a whole. The governance system to be established could serve this purpose. ICOMOS therefore urges the State Party to establish the governance system as committed.

Currently, all the governance and management activities are guided by a management plan that was developed on a contractual basis and signed on 21 December 2023 in the form of a Memorandum of Understanding. The signatories included the governments at the regional, provincial, and municipal levels, the regional branches of the Ministry of Culture, the CESIM/APS, and other major stakeholders. The management plan has two parts: analysis; and strategies, objectives, and actions. It includes an action plan that is divided into four sub-plans: a knowledge plan; a protection and conservation plan; a cultural, territorial. and economic enhancement plan; and a promotional, training, communication, and awareness-raising plan. All the actions are prioritised with a timeline for implementation: the high-priority actions and actions on the individual component parts are highlighted. Tools for implementing and monitoring the management plan are presented, including the creation of the governance system, sources of funding, and elaboration of the tourist system.

Funding is mainly from government sources at the national, regional, and municipal levels. Significant amounts of funding have been invested in the past five years, with more to come for future projects. Overall, funding is sufficient to protect, conserve, manage, and monitor the nominated property.

There are many opportunities for capacity building. Many institutions and foundations within the Ministry of Culture offer expertise in education and training. In addition, universities and academies also provide training opportunities and degree-granting programmes.

ICOMOS considers that the staffing levels at the component parts vary considerably. A better balance of staff distribution across the nominated property should be a priority for site management in the near future.

A Heritage Impact Assessment (HIA) mechanism has not been explicitly embedded in the management system, but legal requirements for preventive archaeology prior to any new construction or development project are in place. Although ICOMOS acknowledges the legal requirements which are in force, it nonetheless considers that in a World Heritage context, the principles and methodology for HIA are designed to specifically assess the impacts on the

attributes of Outstanding Universal Value. Therefore, ICOMOS considers that the *Guidance and Toolkit for Impact Assessments in a World Heritage Context*, developed jointly by the World Heritage Centre and Advisory Bodies, should be adopted by the State Party in its management system.

Risk management has been incorporated into all levels of a disaster preparedness plan for the island.

Visitor management

The Autonomous Region of Sardinia passed a law that promotes and supports tourism as a priority sector for social-economic and sustainable development. A Regional Strategic Tourism Plan 2023-2025 was developed to fulfil this legal requirement. As a general policy, all the "places of culture" are to offer effective and inclusive visits by expanding the ways they are presented to different audience groups and taking into account different disabilities. The principle of sustainability is encouraged in the Strategic Tourism Plan.

Visitor management varies considerably at each component part, depending on its location, accessibility, and contents. Some have museums with adequate tourist facilities and services, others in remote locations are not yet open to tourists, and some can be visited only by reservation. Signs along the main access routes have been installed to guide tourists to most component parts.

Associated with the World Heritage nomination process, significant improvements in visitor management have been made as a result of an infusion of funds. Infrastructure installations coupled with conservation interventions have improved the accessibility and physical condition of the component parts, and have facilitated management activities. A Heritage Impact Assessment for development proposals such as visitor infrastructure should be undertaken before any irreversible decisions are made.

Site presentation and interpretation are achieved primarily through awareness-raising activities such as conferences and workshops, school education, exhibitions, club activities, guided tours, archaeological events, festivals, and publications.

ICOMOS considers that in a World Heritage context, the values of a serial property should be presented and interpreted as a whole in a coordinated manner at all the component parts. ICOMOS observes, however, that currently the *domus de janas* are presented and interpreted individually. With significant investment secured since the launch of nomination process, numerous tourism promotional activities are being conducted simultaneously. ICOMOS is concerned that without a comprehensive tourism management plan and interpretation strategy to guide these activities, the outcomes may impair the understanding of the values of the nominated property as a whole by the visitors.

The additional information received in February 2025 does not provide any indication of progress made or of the timetable envisaged for the development of a tourism management strategy. It indicates that the strategy will aim to create itineraries around the nominated component parts in order to raise awareness about the countless resources of the territories concerned and to distribute the benefits that may arise from the presence of visitors among residents and neighbouring communities.

As part of the nomination of a potential reduced series, ICOMOS considers that it will be urgent to develop a comprehensive tourism management plan, including an interpretation strategy in order to present all the *domus de janas* under a single identity, with each component part telling its own story, while highlighting their contribution to the potential overall Outstanding Universal Value. In addition, the carrying capacity of the *domus de janas* should be established.

Community involvement

The processes of developing the nomination dossier and the management plan have been participatory, with all the major stakeholders actively involved. The future management system for the nominated property will also be a participatory one, with measures to foster community involvement. However, participation has focused largely on governmental organisations and major stakeholders.

In the additional information of February 2025, the State Party clarified that the local administrations were elected by the local communities, and that local communities were involved in the nomination process in different ways, for example by preparing the nomination dossier and management plan. It was also explained that the governance system to be established will be based on the "Participation Foundation" formula, and a website is being developed for better dissemination, promotion and cohesion among the relevant stakeholders. ICOMOS acknowledges this clarification and considers that the involvement of the local communities in the decision-making process for the management of the nominated property could be enhanced.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection is adequate. Management activities have been carried out under the guidance of the management plan co-signed by all major stakeholders. The overall governance system should be established in accordance with the commitments made by the State Party. Although tourism management has been improved since the launch of the World Heritage nomination, there is an urgent need to develop a comprehensive tourism management plan, including an interpretation strategy that is tailored to the potential reduced series centred on the *domus de janas*. The involvement of local communities should be broadened.

6 Conclusion

The Art and Architecture of Prehistoric Sardinia. The domus de janas is a serial nomination comprising twenty-six component parts that feature archaeological and architectural remains dated to the 5th-3rd millennia BCE. Scattered across the island of Sardinia, they represent two cultural phenomena – hypogeism and megalithism – through different monumental forms, with the associated decorative repertoire. ICOMOS considers that the primary interesting feature is the domus de janas (chamber tombs), which testifies to a particular funerary tradition that originated and once flourished on the island, and subsequently spread to other parts of the Mediterranean Basin and Europe more broadly.

The current nominated series does not depict the full picture of the prehistory of Sardinia as was initially intended in the nomination dossier. As pointed out, the scarcity of scientifically investigated settlements makes it difficult to reconstruct some aspects related to social organisation and daily life in Late Prehistory Sardinia.

The proposed Outstanding Universal Value of the nominated series has not been established, due partly to the fact that the contribution of component parts that are associated to megalithism as presented in the nominated series is limited, and these sites are relatively common in the Mediterranean region and Europe, but more importantly, the geo-cultural and global significance of the testimonies of the daily life of the late prehistoric Sardinian communities has not been demonstrated by the comparative analysis.

On the other hand, the funerary field is better known, evidenced by numerous typical hypogeal structures, the domus de janas, often used over millennia. ICOMOS considers that the domus de janas, with their diverse layout patterns, rich decorative artistic manifestations and symbolic expressions, represent pioneering architectural forms and as such demonstrate a strong potential to justify criterion (iii). However, a revised series and narrative would need to be proposed by the State Party, with a focus on funerary practices of the prehistoric Sardinian communities, their development and changes over time in result of ideological or other developments, as evidenced by the variety and complexity of forms of the domus de janas. When proposing a revised selection of the component parts, the State Party should ensure that each of them individually contributes in a substantial way to the reformulated Outstanding Universal Value, as required by paragraph 137 of the Operational Guidelines for the Implementation of the World Heritage Convention, and that the cultural, social or functional links between them and over time are explained and demonstrated.

Considerations should be given to change the name of the revised nomination so that it better reflects the refocus of the justification for inscription.

The overall state of conservation of the nominated serial property is good, factors affecting the property are under control. Conservation measures in place are effective.

The legal protection of the nominated series is adequate. The current management system has not been established. The management plan, co-signed by all major stakeholders, is being implemented. The involvement of local communities in decision-making processes should be strengthened.

Being a serial nomination, a comprehensive tourism management plan, including an interpretation strategy should be developed and implemented, and tailored to the potential reduced series centred on the *domus de janas*. Finally, the carrying capacity for the confined space of the *domus de janas* should be established.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of the Art and Architecture in the Prehistory of Sardinia. The *domus de janas*, Italy, be **referred back** to the State Party to allow it to:

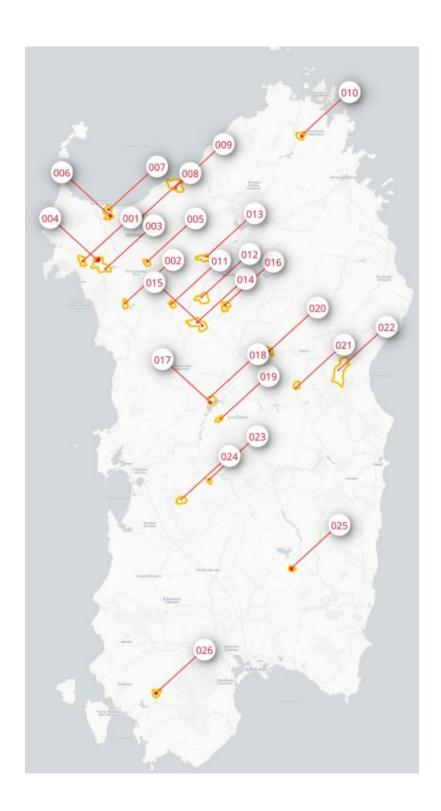
- Reformulate the justification for inscription to focus on the ways the domus de janas reflect the development of the funerary practices and beliefs of the prehistoric communities, including ideological, spiritual, social or other changes over time that can be observed thanks to the longevity of use of these funerary structures,
- Reduce the series by including only the hypogeal structures known as the domus de janas, and reconsider the selection of component parts to ensure that each of them contributes individually in a substantial way to the potential Outstanding Universal Value, while ensuring that cultural, social or functional links between the component parts over time provide a sense of connectivity to the whole revised series,
- Establish an adequate governance system for the revised nominated property, taking into consideration all relevant stakeholders;

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Establishing centralised repository for all the relevant documents and incoming monitoring and research data regarding the selected nominated domus de janas, and make it accessible to all,
- b) Implementing a Heritage Impact Assessment mechanism as defined in the Guidance and Toolkit for Impact Assessments in a World Heritage Context for any development proposals within the revised nominated property (such as visitor infrastructure) before any irreversible decisions are made.
- Developing small-scale monitoring systems tailored to the selected component parts, with

- monitoring indicators designed for assessing the conditions of the sites, as well as development trends and rates of affecting factors,
- d) Developing a comprehensive tourism management plan, including an interpretation strategy,
- e) Strengthening the involvement of the local communities in the decision-making process for the management of the revised nominated property.



Map showing the location of the nominated component parts

Gdynia (Poland) No 1715

1 Basic information

Official name as proposed by the State Party

Gdynia. Early Modernist City Centre

Location

City of Gdynia Pomorskie Voivodeship Republic of Poland

Brief description

The city centre of Gdynia includes buildings and planning features that illustrate the large-scale application of modernist ideas in the process of creating a new city. Located on the Baltic Sea coast, the village of Gdynia was dramatically rebuilt during the period between the First and Second World Wars as a major sea gateway of the first Polish Republic. Buildings in its city centre make up a characteristic and compact complex of modernist architecture, with strong individual architectural expressions. These buildings, together with villas on Kamienna Góra hill and other residential buildings of this period, demonstrate a decisive break with historicism. The nominated property, embracing the two most significant east-west and north-south streets, features interwar planning blocks and the majority of the preserved buildings of the city centre dating to that period.

Category of property

In terms of categories of cultural property, as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

Included in the Tentative List

26 September 2019 as "Modernist Centre of Gdynia – the example of building an integrated community"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 26 to 29 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 27 September 2024 requesting further information about the nominated

property's description, integrity and boundaries, legal protection and management, and conservation.

Additional information was received from the State Party on 7 November 2024.

An interim report was provided to the State Party on 20 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the conceptualisation of the nominated property, the relationship of the nominated area to the overall planned city, the precise location of "modernist" buildings, urban open spaces, legal protection, and development projects.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a summary of the most relevant aspects.

Description and history

Gdynia is situated on the Baltic Sea coast on Gdańsk Bay. The nominated property is part of Śródmieście, the downtown district of Gdynia. It features public, commercial, and residential buildings from different periods. Of these, the buildings and the urban planning solutions created between 1926 and 1939 constitute the key evidence of the modernist development of the city during the period between the First and Second World Wars.

The global phenomenon of architectural modernism emerged in the first decades of the 20th century as a social, artistic, and cultural attitude that favoured new building materials and new engineering advancements, clean lines, carefully balanced compositions, exposed building materials, and a lack of adornment or reference to historical architecture styles. It was guided by the principle of functionality, whereby the physical form of a building could be derived from its function. Social progress along with hygiene and other fundamentals of health were underlying modernist objectives.

The nominated property focuses on the two most significant urban axes of the city centre, 10 Lutego Street – Kościuszki Square – Jana Pawła II Avenue (east-west) and Świętojańska Street (north-south). This area contains interwar residential blocks and the majority of the preserved buildings of the centre dating to that period.

These buildings stand alongside constructions from earlier periods, such as the post-Second World War era, and post-Socialist developments. The nominated property thus demonstrates the shift in design language from historicism towards functionalism and the International Style, as well as later transitions to socialist-modernist and contemporary architectural styles.

The key elements of the nominated property are the interwar modernist buildings that became dominant after 1933. The first of these are the Post Office (completed in 1929 and extended in 1937) and the Stanisław Pręczkowski Apartment House at 10/12 Kościuszki Square (1928). The buildings from the 1930s embrace functionalist principles and modernist design. Among the preserved architectural icons of this period are the ZUS (Social Insurance Institution) Building (Roman Piotrowski, 1935), the Market Hall Complex (Stefan Reychman and Jerzy Müller, 1936-1937), the District Court (Zbigniew Karpiński, Tadeusz Sieczkowski, and Roman Sołtyński, 1936), and the Cotton Arbitration Chamber (Wacław Tomaszewski, 1938).

These buildings, together with villas on Kamienna Góra hill and other residential buildings of this period, demonstrate a decisive break from historicist buildings and the builders who were responsible for their traditional designs. This break was formalised through government decrees in 1928 and 1933 that made higher technical education mandatory for persons designing buildings in Gdynia. As a result, more than twenty Polish and foreign architects, all graduates of advanced European and Polish architecture schools, were prompted to engage in the redevelopment of Gdynia.

The interwar modernist housing developments were characterised by the use of reinforced concrete for frame structures, flat roofs, and functionalist design and planning. Modern amenities such as gas, electricity, water supply, elevators, bathrooms, and sewerage systems were gradually installed in the city from the late 1920s onwards. Despite the advancements in the infrastructure of the city, by 1939 only four percent of the households of Gdynia were supplied with gas.

Among the notable buildings of this period are the Miron Mikiciński and Leokadia Dańkowska Apartment House at 35/35a 10 Lutego Street, the Kazimierz Turzyński and Wojciech Mikołajczak Apartment House at 32 Świętojańska Street, the Józef Skwiercz Apartment House at 23 Świętojańska Street, the Antoni Ogończyk-Bloch and Leon Mazalon Apartment House at 122 Świętojańska Street, the Adam Jurkowski Apartment House at 15 Kościuszki Square, the Pantarei Apartment House at 37 Abrahama Street, and the "M. Krenski Industrial Company" at 55 Świętojańska Street.

An important encouragement to achieve the desired scale of the interwar development of Gdynia was a Statesponsored financial incentive programme that enabled private investors to build within a defined urban plan and building regulations. Combined public and private

investment enabled rapid urban expansion, accommodating more than 120,000 inhabitants by 1939.

The interwar urban concept of Gdynia combined a traditional street layout with five- or six-storey urban apartment houses having compact street frontages. The urban regulations were intended to ensure more open space within each city block, reflecting the advanced ideas on health and hygiene that permeated the urban planning discourse of the time. According to the 1931 planning regulations, the permissible height in the centre of Gdynia was five or six storeys, reaching up to eighteen metres, and the highest permissible density of plot development was sixty percent. From the mid-1930s, high-density urban zones allowed one storey higher than specified in the planning regulations, provided that the additional floor was set back from the facade.

These plans and regulations reflect the planning discourses of the early 20th century, such as the Garden City, Industrial City, and Zoning Plan movements.

These core principles were largely followed in Gdynia's post-Second World War constructions and were sustained in the subsequent urban plans by the Socialist government of Poland. Post-Socialist developments such as the Transatlantyk commercial and residential building within the nominated property and the Sea Towers highrise complex in the buffer zone deviated from these principles and stand out in the skyline of the city centre for their height and scale.

The nominated property has an area of 87.9 ha, and a buffer zone of 168.9 ha.

Even though Gdynia was largely developed in the interwar period, its history as a small fishing village goes back to medieval times. The first historical record mentioning Gdynia dates to 1253. The development of a railway toward the end of the 19th century and the establishment of the Gdynia railway station on the Gdańsk-Wejherowo line in 1894 triggered the development of the village into a summer resort, in line with the trend around the Baltic Sea and the North Sea area at that time. In 1904, the first resort house with a lido and park was built. The street that was created to connect the resort house with the station (10 Lutego Street) became one of the axes of the later modern urban plans of the city. Some buildings of this early period, such as the house of the first Head of the Gdynia Commune (Building No. 2, 10 Lutego Street), have been preserved in the city centre. Other buildings from the post-First World War era of the resort, such as the neo-baroque style Church of Our Lady Queen of Poland (Kościół Najświętszej Marii Panny), also form part of the urban fabric of the city centre. These reminders of the development of the city have not been identified as attributes of the proposed Outstanding Universal Value.

The sweeping transformation of the character of the city in the 20th century resulted from the decision of the national government to proceed with a major port

development in Gdynia. As no major port had been granted to Poland by the Treaty of Versailles in 1919, the newly established Polish Republic saw a pressing economic need to rapidly develop a sea gateway. The decision was adopted in 1922. Polish engineer Tadeusz Wenda, and urban planners and architects Adam Kuncewicz and Roman Feliński were put in charge of planning and implementing the new port and the related urban development concept that followed in 1926.

The rapid expansion of the port to accommodate a coal trans-shipment base and additional port basins towards the south dictated that adjustments be made in 1927-1928. As a result, the most representative part of the first concept - a large seaside square and boulevard connecting the station square to the seaside - was not realised. The idea of connecting the city to the waterfront was later partly accomplished by placing the South Pier as part of the Grand District at the extension of 10 Lutego Street and Kościuszki Square and creating a scenic opening towards the sea. The works were conducted within the framework of the 1931 and 1935 urban plans. The construction of the South Pier was completed in 1936, with the Polish Sailor's House and Maritime Station under construction by 1939. These buildings remain the only architectural references to the planned Grand District, the development of which was halted by the Second World War and German occupation. These unrealised visions were followed up to some degree in the post-Second World War period, though the city never regained its former importance.

The post-Second World War geopolitical circumstances resulted in the integration of nearby Gdańsk - historically the key Baltic port - into the territory of Poland, thus diminishing the flagship role of Gdynia. The commercial and residential fabric of Gdynia survived the Second World War relatively undamaged and continued to develop in the subsequent years with the construction of some notable public buildings. These include the Coastal Sailing Station (1960-1970s), the extension of the former Maritime Station in the form of the Oceanographic Museum and Marine Aquarium (1971), the Music Theatre (1983), and a variety of housing and administrative buildings built from the 1950s to the 1980s in a socialistmodernist style. However, the port infrastructure was significantly damaged by wartime bombings and was rebuilt according to new needs and new engineering standards.

State of conservation

A large number of exemplary conserved and retrofitted examples of modernism bear witness to a well-established professional practice of conservation and restoration of modern buildings, constructions, materials, components, and techniques.

The interwar concept of the city centre is also largely preserved and has developed in line with its founding principles. However, the state of the inner courtyards within the blocks does not appear to be satisfactory: most inner areas seem to include auxiliary outbuildings, which

makes it difficult to perceive the original idea of "green" courtyards presented in the nomination dossier. The State Party specified that some of these outbuildings date to the interwar period and have been protected by spatial development plans; other auxiliary structures, mainly garages, were built in later periods before heritage protection status was given to the nominated property. Given their small dimensions, these structures are not considered to violate the original planning concept. However, the city administration will encourage their removal by implementing a municipal programme for greener courtyards.

The additional information provided by the State Party in November 2024 informs that the total number of buildings within the nominated property is 455, of which 168 require various levels of restoration and renovation work.

Some of the gable-roofed houses from the earlier periods of the development of the city appear to be less maintained. While they do not adhere to modernist design principles, they have survived in the rectangular street grid of modern urban planning. Despite the fact that these buildings are not identified as attributes of the proposed Outstanding Universal Value, a strategy for their conservation should be integrated into the conservation plan for the nominated property.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressures. Visually dominant developments and densification are present within the nominated property as well as in the buffer zone (the eleven-storey Transatlantyk complex and the 127.4-metre-high Sea Towers, being prime examples).

The additional information provided by the State Party in November 2024 clarified that a development plan has been approved for the South Pier, at an unrealised part of the modernist urban plan of 1935 in which a row of four oneand two-storey pavilions were built in the 1970s. The pavilions are to be replaced by the five-storey Nova Marina Gdynia complex. The State Party also described recently approved development plans for the base of South Pier, for Żeromskiego Street, and for the intersection of the two main axes of the city centre (near the Gdynia "InfoBox -Observatory of Change"). There are also other planned developments to the north and south of the nominated property, as well as near the port and railway. These seem to have influenced the delineation of the buffer zone. No Heritage Impact Assessment has been submitted for these projects, although the State Party clarified in February 2025 that the administrative procedures include an assessment of the potential impact on heritage at the phase of projects agreement.

Given the numerous planned developments in and around the nominated property, ICOMOS strongly recommends that a Heritage Impact Assessment mechanism for all development proposals be developed and implemented as soon as possible.

The Crisis Management Plan for the City of Gdynia (2018) and the Monument Protection Plan in the Case of Armed Conflict and Crisis Situation for the City of Gdynia (2020-2022) complement the municipal Care Programme for the Monuments and define countermeasures against threats caused by war and extreme weather events.

ICOMOS considers that the state of conservation is good and that the main factors affecting the nominated property are development pressures. A Heritage Impact Assessment mechanism should be developed and implemented as a priority.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The development of the nominated property from 1926 to 1939 demonstrates how modernist planning principles and design language were appropriated. This process allowed a synthesis between these advanced principles and the established forms of architectural design and planning layout, as well as the spirit of a port city.
- This synthesis manifests itself particularly in the form of modern apartment houses with no annexes and of urban blocks with inner open spaces, in line with the principles of hygiene, access to natural light, and greenery.
- The spatial and functional concept of the port city was led by the newly independent Republic of Poland and implemented with the involvement of a vast number of individual investors and designers encouraged by State subsidies and regulations. The importance of the port for the development of the city and the close connection to the sea was highlighted in the first urban concept and urban plans, and manifested in the design of the South Pier as well as the design elements of individual buildings.

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be broadly defined as: the aspects that illustrate urban planning and architecture during the formative phase of modernism; the elements that demonstrate a broad scale of application and a wide spectrum of modernist forms; the elements that display a high level of adaptability to modern-day conditions and

requirements; the places where traditional ideas of cityshaping are combined with the innovative postulates of the modernist avant-garde, which are expressed in the combination of the traditional street-and-square structure with the innovative concept of the urban block, and apartment houses without annexes; as well as places symbolising the connection of the newly independent nation with the sea, as expressed in the South Pier extension along the main east-west axis of the city.

ICOMOS considers that the identification of the proposed key attributes is broad and lacks precision. This is a concern, since the attributes that support the Outstanding Universal Value of a property are supposed to form the focus of protection, conservation, and management actions

ICOMOS notes that the use of the term "Early Modernist" in the name of the nominated property is not adequate, as in the European context this term is associated with the period 1900-1918.

Therefore, ICOMOS recommends that the name of the nominated property be changed to: "Gdynia Modernist City Centre".

Comparative analysis

The comparative analysis has been developed around the following parameters: cities and sites developed during the formative phase of architectural modernism (1920-1939); modernist cities from later periods (1940-1990); modern port cities that are similar in their relationship with the sea; other Polish cities with modernist urban plans and buildings. It has examined twelve properties around the world inscribed on the World Heritage List as well as four other properties. The State Party notes that modernist properties are not sufficiently represented on the World Heritage List.

The historical significance of the nominated property is related to the geopolitical transformations that took place in Europe following the First World War and, specifically, the nation-building process of the newly independent Polish Republic. The nominated property also reflects the adoption of modernist ideas that became prominent in Europe and worldwide at that time. In the additional information of February 2025, the State Party described the influence that the advanced urban concepts of the era had on the planning of Gdynia, such as the Garden City, Industrial City, and Zoning Plan movements, which were pivotal in promoting planning norms for health and hygiene. The division of the city into functional districts (residential, industrial, service, and recreational) is still legible in the spatial layout of Gdynia, where the districts are separated from the centre by green belts or industrial infrastructure.

From the formative phase of architectural modernism (1920-1939), the comparative analysis comprises Asmara: A Modernist African City (Eritrea, 2017, criteria (ii) and (iv)); The works of Jože Plečnik in Ljubljana – Human Centred Urban Design (Slovenia, 2021, criterion

(iv)); Modernist Kaunas: Architecture of Optimism, 1919-1939 (Lithuania, 2023, criterion (iv)); White City of Tel-Aviv – the Modern Movement (Israel, 2003, criteria (ii) and (iv)); Ivrea, industrial city of the 20th century (Italy, 2018, criterion (iv)); Berlin Modernism Housing Estates (Germany, 2008, criteria (ii) and (iv)); and Bauhaus and its Sites in Weimar, Dessau and Bernau (Germany, 1996, 2017, criteria (ii), (iv) and (vi)).

From later periods (1940-1990), Brasilia (Brazil, 1987, criteria (i) and (iv)), and Chandigarh (India), which is included in The Architectural Work of Le Corbusier, an Outstanding Contribution to the Modern Movement (Argentina, Belgium, France, Germany, India, Japan, Switzerland, 2016, criteria (i), (ii) and (vi)) are compared. The modern port cities compared are: Le Havre, the City Rebuilt by Auguste Perret (France, 2005, criteria (ii) and (iv)); Victorian Gothic and Art Deco Ensembles of Mumbai (India, 2018, criteria (ii) and (iv)); Rabat, Modern Capital and Historic City: a Shared Heritage (Morocco, 2012, criteria (ii) and (iv)); Dalian (China); and Shanghai (China). And finally, the compared modernist cities in Poland are Stalowa Wola and Nowa Huta.

The comparative analysis attempts to establish the exceptionality of the nominated property on the basis of a combination of chronological, functional, and typological frameworks. The nominated property is considered by the State Party to be exceptional for its scale of development, the functional programme of the city centre, the connection to the sea reflected in planning, and the consistent application of modernist ideas in architectural design and urban layout.

The additional information of February 2025 strengthened the comparative analysis with references to modernist developments in newly independent European nations after the First World War, highlighting the distinctive character of Gdynia as a newly developed large-scale port city. A brief overview of two additional comparators – the modernist industrial towns of Zlín (Czechia) and Bat'ovany (now Partizánske, Slovakia), newly built in Czechoslovakia in the 1930s – highlighted the functional and stylistic plurality of the interwar development of Gdynia, where, unlike the comparators, modernist planning principles were combined with a densely-built traditional street-and-square planning model.

ICOMOS considers that the additional information provided by the State Party substantially strengthens the comparative analysis in light of the architectural and planning innovations adopted in the process of nation-building within newly independent States of central-east Europe. The information on the formative planning and design principles that influenced the development of Gdynia confirms the strategic use of Garden City, Industrial City, and Zoning Plan ideas in developing a new port city of an unprecedented scale. Architects and planners creatively combined the city centre tradition of frontage development with the modernist innovation of an urban block with open courtyards and modernised apartment houses with no annexes. The adroit application

of modernist ideas enabled quality urban living for a large number of people with various occupations related to the development of the port, and the creation of a vibrant, modern city centre.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii) and (iv).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the nominated property displays an exchange of cultural and social values by means of the modernist breakthrough in the development of architecture and town planning that took place in the 1920s and 1930s, materialising the idea of health and hygiene in housing. The Gdynia apartment houses without annexes and urban blocks with open courtyards free of outbuildings are presented as a manifestation of these exchanges.

The State Party notes that the planning of Gdynia responded to the demands for modern living conditions in the city while integrating the traditional concept of street frontage alignment in downtown development. The nominated property provides evidence of the architectural and planning transformations that took place in the interwar period, from traditional historicism to avant-garde functionalism and the International Style.

ICOMOS considers that urban blocks with open courtyards and apartment houses without annexes in Gdynia can be seen to reflect modernist principles of health and hygiene. Buildings of the interwar period also illustrate the influence of Belgian, Dutch, and German avant-garde structures of the time. However, there is no detailed or convincing explanation of how the results of this integration can be seen as influential in the development of architecture and town planning in 20th-century Poland or beyond. There are substantial doubts as to whether the nominated property can be considered a centre of modernist architecture that influenced the regional and global spread of modernist ideas.

The argument about the exemplarity of the city centre of Gdynia as a showcase of modernism "entirely designed and subjected to modernist concepts" is inconsistent with the emphasis put forward by the State Party on the role of the nominated property in the transition from historicism to modernism, that encompasses many buildings that illustrate other architectural movements and styles.

ICOMOS considers that this criterion is not demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that the urban layout of the nominated property represents an outstanding and pioneering example of the formative phase of architectural modernism. Gdynia is claimed to be an unprecedented large-scale modernist city centre in Europe and globally at the time., With its modernist buildings and urban layout, it reflects the connection of the city to the sea. According to the State Party, the buildings, aligned on a block perimeter with no annexes or wings, combine features of a traditional apartment house with the modern demands for quality living, and constitute a significant step in the evolution from the 19th-century tenement to the modern apartment house.

The State Party also notes that the nominated property reflects the diverse tastes of the many individual investors and the generation of young architects at the time, while also displaying architectural cohesion according to the building principles and regulations defined by the early urban plans.

The city of Gdynia was designed to provide modern, highquality urban living for a large number of people associated with the rapid development of the strategic national port. The use of modernist design and planning concepts and new materials facilitated the achievement of this goal.

ICOMOS considers that the nominated property can be seen as an exceptional large-scale application of modernist ideas in the process of creating a new city, and a reflection of the geopolitical transformations that took place in east-central Europe in the aftermath of the First World War. The large number of preserved interwar modernist buildings, as well as the key planning features of the city centre, are outstanding illustrations of this endeavour. The urban layout of the city centre and buildings dating from the 1920s and 1930s reflect an exceptional, though short-lived, burst of activity to build a city that resonated with national pride and burgeoning social aspiration.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the nominated property meets criterion (iv), but that criterion (ii) has not been demonstrated.

Integrity and authenticity

Integrity

The integrity of the nominated property is based on the fact that it is a built ensemble that demonstrates advanced ideas in modernist architecture and planning.

The nominated property covers the area of the city centre of Gdynia, with its main urban axes and modernist planning grid containing a large number of modernist residential, commercial, and public buildings. However, the boundaries of the nominated property do not appear to be based on historical boundaries or construction periods, excluding buildings or areas that reflect the formative city planning principles, such as the Post Office and the Sorting Hall (Konstytucji Square), the registered former Swedish Sailor's Church, and the historic row of attached houses for fishermen on Jerzego Waszyngtona Street.

ICOMOS also notes the visual impacts that recent developments of an incompatible scale have on the integrity of the modernist city centre. The integrity of the open courtyards in modernist planning blocks might also be seen as compromised by outbuildings of various periods.

Due to the destruction of the port during the Second World War and later developments, the nominated property lacks some important elements of the port and waterfront as they were in the late 1930s. The port has been irreversibly changed and has, therefore, been excluded from the nomination. This makes it difficult to perceive the entire founding concept that permeated the interwar modernist development of the city.

In addition, the buffer zone boundaries do not reflect the relationship of the city centre with the satellite residential districts such as the Kamienna Góra residential neighbourhood and landscape elements that would allow the scale of interwar modernist development to be more easily perceived.

The nominated property therefore represents an internally coherent but limited manifestation of the modernist ideals that underpin the interwar development of the city.

Because of the concerns outlined above, ICOMOS considers that the conditions of integrity have only been partly demonstrated.

Authenticity

The city centre of Gdynia retains a high degree of authenticity in terms of its interwar urban plan and outline. Historical buildings have been largely preserved in form and design, material and substance. This also often applies to façade details and the key elements of the building interiors. The city centre and its buildings largely retain original functions and uses, although the open courtyards have in many cases been occupied with outbuildings.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity have been partly met and the conditions of authenticity of the nominated property have been met.

Boundaries

The boundaries of the nominated property reflect the boundaries of earlier designations in the Register of Monuments (2007) and the list of Monuments of History (2015). The boundaries are delineated to highlight exclusively the key features of the interwar modernist planning and architecture of the city, leaving out much of its context in terms of port industry or earlier resort development. The irregularity of the boundary demarcation may also be seen as an indicative response to development projects currently planned in the city centre and vicinity. The nominated property occupies a large part of the Śródmieście (downtown) district, which has 11,389 inhabitants.

The proposed boundaries of the nominated property are characterised by noticeable projections and recesses. These street alignments, property lines or terrain jumps do not appear to be based on historical boundaries or construction periods. For example, the irregular border at the railway station excludes the Post Office and the Sorting Hall, although they are spatially part of Konstytucji Square and functionally part of the railway station complex and the traffic system of the port city that connects rail and water transport. The protruding and receding boundary along the railway line to the west, and the receding boundary from Jana z Kolna Street to the north, also appear historically unsubstantiated, and result in the exclusion of the registered former Swedish Sailor's Church from the nominated property.

The western boundary along Abrahama Street, which runs through the interior of the blocks, is partly built over by "bridge" houses spanning the narrow street. The boundary arriving at a dead end does not seem consistent and systematic.

Equally regrettable is the exclusion of the historic row of attached houses for fishermen on Jerzego Waszyngtona Street, orientated to the waterfront and to the port opposite, from the boundaries of the nominated property. They represent a valuable completion of the more representative public facilities of the port and shipping administration that are included in the nominated property and its buffer zone.

The exclusion of the waterfront and water bodies from the buffer zone seems questionable, given the emphasis placed in the nomination dossier on the open character of the modern city towards the harbour and the water.

Similarly, the partial inclusion of Kamienna Góra in the buffer zone would seem problematic. This area was initially planned as a seaside resort and developed into an exclusive residential area in the interwar period. Some of

the villas are listed as historic monuments and as sites on the "Gdynia Modernism Route".

In summary, ICOMOS considers that the boundaries of the nominated property should be further clarified to include all the attributes that contribute to its proposed Outstanding Universal Value (such as the Post Office and the Sorting Hall (Konstytucji Square), the registered former Swedish Sailors' Church, the historic row of attached houses for fishermen on Jerzego Waszyngtona Street, and that the buffer zone boundaries should be expanded to include the waterfront and water bodies towards the south and the east of the Baltic Sea, as well as the entire Kamienna Góra residential area, so that the scale of interwar modernist development of the city be more could easily perceived .

In addition, ICOMOS considers that the legal provisions applicable to the buffer zone should be further clarified to ensure that it effectively provide an additional layer of protection to the nominated property.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the identification of key attributes is broad and lacks precision. The comparative analysis justifies consideration of this property for the World Heritage List. Criterion (iv) has been justified, while criterion (ii) is not demonstrated. The conditions of authenticity have been met but conditions of integrity have only been partly met as the proposed boundaries do not include all the evidence of the application of modernist planning principles in the development of the new port city. Therefore, ICOMOS considers that the boundaries of the nominated property should be adjusted to include all the relevant attributes of the proposed Outstanding Universal Value, namely the Post Office and the Sorting Hall at the Konstytucji Square, the former Swedish Sailor's Church, and the historic row of attached houses for fishermen on Jerzego Waszyngtona Street. The area of the buffer zone should also be expanded to include the waterfront and water bodies towards the south and the east of the Baltic Sea as well as the entire Kamienna Góra residential area, so that the scale of the interwar modernist development of the city is more easily perceived. The legal provisions applicable to the buffer zone should be further clarified as well.

4 Conservation measures and monitoring

Documentation

The inventory and documentation of the nominated property can be considered adequate. The inventory is maintained by the responsible monument authorities at the city and state levels and is continuously supplemented and updated. These inventories, in conjunction with archival and administrative documents as well as recording projects, provide solid baseline documentation

for future management, conservation, and monitoring initiatives.

Conservation measures

There are many remarkably well-preserved and retrofitted modernist elements, which bear witness to the efforts made by the State Party in terms of research, development of knowledge and skills related to the conservation of modernist architecture, as well as in terms of direct conservation and rehabilitation measures.

Concentrating conservation and revitalisation measures, as well as financial and professional resources on outstanding public and private monuments located within the nominated property, and encouraging private owners through municipal funding, can be seen as effective strategies to ensure a good state of conservation for listed city centre buildings and streetscapes.

The Gdynia Monument Authority has created a self-learning and self-optimising system of monument conservation and communication for both experts and non-specialist, and has also fostered the development of a qualified and economically viable heritage sector. In addition to conferences and research publications targeted at academic audiences, the regular publication of good conservation examples in *Gdyńskie konserwacje-praktyczny informator* (Gdynia Maintenance-A Practical Guide), which has now grown to twenty-six editions, informs owners, users, architects, and craftspeople in Gdynia about conservation and repair techniques for the modernist heritage.

The Care Programme for the Monuments of the City of Gdynia (2019-2022) is the main instrument for planning and implementing conservation actions. This programme is consistent with the Pomorskie Voivodeship development strategy and with other spatial and ecological planning and protection documents at the levels of the Voivodeship and the city.

Monitoring

The monitoring system for the nominated property is based on the regional and municipal monuments care programmes (Care Programme for the Monuments of the Pomorskie Voivodeship (2021-2024) and Care Programme for the Monuments of the City of Gdynia (2019-2022)). Monitoring of the implementation of the programmes is coordinated by the Board of the Pomorskie Voivodeship, which, in line with the Heritage Protection and Care Act provisions, prepares reports every two years.

The Gdynia municipality has set up a coordination group (Regulations of the Mayor of Gdynia No. 14591/14/VI/U, 22 April 2014, and No. 4079/16/VII/U, 2 February 2016) composed of the heads of the units of the city administration and other responsible entities in charge of the protection and promotion of the modernist urban fabric of Gdynia. The group meets once every quarter and reports to the Mayor.

As a Monument of History, the nominated property has also been the subject of monitoring at the national level (Guidelines of the General Conservator of Monuments of 19 November 2018). The national system of periodic reporting for the state of conservation of each Monument of History is still under development. Meanwhile, monitoring is carried out through regular inspections of the nominated property by the Office of the Municipal Conservator of Monuments and the Office of the Voivodeship Conservator of Monuments.

The conservation authorities at the municipal and regional levels are entitled to control investments and, in justified cases, to suspend the performed works. Unauthorised interventions are subject to penalties.

The nomination dossier provides details of the monitoring indicators developed for assessing the state of conservation of buildings, facade details, and trees. More detailed information on the application of these indicators in the process of monitoring is provided in the management plan adopted by the Gdynia City Council in 2023.

ICOMOS considers that the documentation, conservation measures, and monitoring system for the nominated property are adequate.

5 Protection and management

Legal protection

The Heritage Protection and Care Act of 2003 conferred on the nominated property the highest national recognition and protection as a Monument of History in 2015, based on its earlier registration in the Register of Monuments of the Pomorskie Voivodeship in 2007. Both registrations were made under the title "Gdynia City Centre's Historic Urban Layout", and are congruent with the nominated property in terms of area and boundary delimitation. The 2007 registration of Gdynia also included a separate delineation of the "Urban complex of Kamienna Góra" and "Exposure protection zone of the urban complex of Kamienna Góra". However, these are not included in the nominated property and only a small portion is in its buffer zone.

Within the designated urban heritage site of Gdynia there are 25 buildings inscribed individually in the Register of Monuments of the Pomorskie Voivodeship between 1969 and 2015 as monuments of regional significance. In addition, there are 265 buildings and complexes of local significance in the nominated property and 165 in the buffer zone that are registered in the municipal inventory of monuments and overseen by the Municipal Conservator of Monuments.

National and regional registrations of the city centre do not constitute an additional layer of protection; therefore, a buffer zone has been defined for the nominated property. The rationale and legal stipulations that apply to this wider area are not clear.

The nomination dossier and additional information provided by the State Party in November 2024 and February 2025 clarify that various governance arrangements enforce the complex system of regional and local spatial planning. The Study of the Conditions and Policy Directions for Land Use, which is the main planning document of Gdynia, includes several grades of individual and area-based protection as well as protection zones for cultural heritage. Several local development plans are in place, and a few others are in the process of elaboration and adoption. The creation of a General Plan of the City of Gdynia was started in 2024, but ICOMOS has not been provided with its terms of reference or the expected date of completion.

The local development plans adopt a three-level value-based gradation of buildings. A total of 278 buildings are assigned one of the three levels, based on their historic and cultural values and respective restrictions regarding interventions.

The nominated property also incorporates small closed-off areas of national defence and security, defined on the basis of the Land Surveying and Cartography Law of 17 May 1997. No local spatial development plans have been adopted for these areas.

All planned interventions to registered monuments require the agreement of the state. Modifications to municipal planning projects are possible through the involvement of a higher administrative and expert level. Obligatory protection of the interiors is guaranteed only for registered individual monuments. ICOMOS considers that it would be beneficial to establish an inventory of these interiors, especially those accessible to the public (such as semi-public entrance areas, foyers, stairwells, common areas, etc.).

There are several archaeological protection zones defined by the local development plans that fall within the nominated property or its buffer zone, although their content, locations, and delimitations are not included in the nomination dossier or the management plan.

Various natural areas around the city are protected by legislation. Among these, the most relevant to the nominated property are the Natura 2000 – Zatoka Pucka special protection areas (2004) for the protection of birds and natural habitats. They include the sea adjacent to the breakwater and the Kamienna Góra beach.

Other notable documents that assist with and relate to the conservation of the heritage of Gdynia are the Monument Protection Plan in the Case of Armed Conflict and Crisis Situation for the City of Gdynia, the City of Gdynia Climate Change Adaptation Plan by 2030, and the City of Gdynia Environmental Protection Programme for the Period 2019-2022 with a Perspective to 2026.

ICOMOS notes that, while the conservation of cultural heritage is mentioned as a planning priority, a lack of specifications and supporting maps in the nomination dossier makes it difficult to understand the planning

provisions related to the nominated property and its buffer zone.

ICOMOS considers that, despite a lack of clarity concerning some aspects of the planning of the nominated property and particularly the protection of its buffer zone, the existing systems and mechanisms appear to adequately safeguard the identified attributes that sustain the proposed Outstanding Universal Value.

Management system

The nominated property is managed by the municipal and regional authorities under the national legislation for heritage. All interventions to listed monuments require approval, and registered monuments are subject to municipal supervision, which coordinates with the Voivodeship. Higher-level development plans, land-use plans, and traffic planning in conservation areas are also coordinated with the responsible monument authorities.

The Gdynia Development Strategy 2030 (Gdynia City Council Resolution No. XXXI/768/17 of 26 April 2017) serves as the key management framework for the nominated property. Regional and municipal monument care programmes include the Care Programme for the Monuments of the Pomorskie Voivodeship (2021-2024), the Care Programme for the Monuments of the City of Gdynia (2019-2022; 2023-2026 in preparation), the Sea Shore Protection Programme (2004-2023), and the Study of the Conditions and Policy Directions for Land Use in Gdynia (2019, to be replaced by the General Plan of the City of Gdynia upon its elaboration). Other sectoral strategies and plans have been prepared in line with this framework.

Since 2012, in line with Article 96 of the Heritage Protection and Care Act, some tasks from the scope of works of the Voivodeship Conservator of Monuments have been transferred to the Mayor of Gdynia and are carried out by the Municipal Conservator of Monuments. The Voivodeship Conservator of Monuments in Gdańsk and the General Conservator of Monuments at the national level oversee the activities of the municipal authorities and the implementation of the Municipal Programme for the Care of Monuments.

The additional information of November 2024 informs that by a regulation of the Mayor dated 27 February 2024, the Office of the Municipal Conservator of Monuments was raised to the status of an independent department, extending its scope to include, among others, the coordination of matters related to the protection, sustainable development, and the promotion of the city centre of Gdynia.

The management plan of the nominated property for the years 2024-2029, was adopted by the Gdynia City Council in 2023. The document provides a summary of key measures and is divided into three main sections: presentation and description of the nominated property; presentation of the protection and management system, including monitoring recommendations; and considerations

on the use of the nominated property with regards to World Heritage requirements.

An interdisciplinary coordination group that brings together the responsible sectoral units was established in September 2024 by the Mayor (Regulation No. 434/24/IX/O of 17 September 2024) in line with the management plan. The State Party additionally advises that, since 1 November 2024, two employees of the Office of the Municipal Conservator of Monuments have been assigned tasks related to the nominated property. The creation of a special unit is envisaged in the event of inscription on the World Heritage List.

ICOMOS recommends the early implementation of the key measures identified in the management plan.

The staffing levels and expertise as well as funding resources appear to be adequate for the management objectives.

Visitor management

Over the last twenty-five years, through numerous publications, conferences, and exhibitions, citizens and visitors to the city have come to know and appreciate Gdynia as the "capital of modern architecture" of Poland.

The city has adequate infrastructure for visitors. Comprehensive tourist services within the nominated property are provided by the City Tourist Information Centre. Since 2016, the Gdynia Tourism Board has been the key driver for strategic and promotional cooperation between the city and the entities engaged in the tourism industry.

Activities aimed at the presentation of the cultural heritage of Gdynia and the development of tourism are performed by different public and private stakeholders, including residents and enthusiasts of the modernist architecture of the city. Groups such as the Circle of City and Field Guides and the Polish Tourist and Landscape Association of Gdynia provide trained guides for visitors to learn about the modernist past of the city. Modernist heritage is promoted through a dedicated Gdynia Modernism Route as well as the sightseeing badge "Enthusiast of Modernism" (*miłośnik modernizmu*).

The Office of the Municipal Conservator of Monuments regularly organises walking tours along the route of historic sites undergoing conservation works. Various other tours are regularly implemented by the Gdynia Development Agency and the City Centre District Council.

Several cultural institutions, including the Gdynia City Museum, Oceanographic Museum, and Marine Aquarium, offer diverse programmes to visitors. Policies and programmes are in place for the presentation and interpretation of the cultural heritage of the nominated property.

Community involvement

According to the nomination dossier, local communities have been included in the nomination initiative as discussion partners and participants. These include property owners, residents, other users, interested and committed citizens of the city and region, as well as experts in the fields of monument conservation, art history, and planning. The local construction industry as well as the restoration and monument trades are also identified as being involved in the nomination process. Unfortunately, the nomination dossier does not provide sufficient evidence and documentation of this participatory process. There is little or no information on how the complex private ownership situation of the nominated property has been addressed in the consultation process. Additional evidence and documentation of the participatory consultation process should be provided.

The State Party outlines municipal programmes for co-funding conservation work on private buildings and planning decision-making procedures that encourage local community participation. The building owners are mentioned as being included in the investment process and participating in meetings during conservation works and in final work acceptance proceedings.

The management plan further presents a broad range of participants to disseminate information about the nominated property, including owners, residents, students, numerous non-governmental organisations, foundations, and associations that are active in the heritage and education sectors.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the protection of the nominated property appears to be adequate despite a lack of clarity concerning the legal provisions for the buffer zone. It would also be beneficial to establish an inventory of historical interiors of registered state and municipal monuments that are accessible to the public (such as semi-public entrance areas, foyers, stairwells, common areas, etc.). ICOMOS also considers that the management of the nominated property is satisfactory and recommends the early implementation of the key measures identified in the management plan. Finally, Additional evidence and documentation of the participatory consultation process should be provided.

6 Conclusion

The nominated property of "Gdynia. Early Modernist City Centre" illustrates the creative use of modernist architectural and planning concepts to transform Gdynia into a key port city following the First World War. By embracing modernist ideas and combining them with traditional planning approaches, Gdynia succeeded in providing modern, high-quality urban living for a large number of people associated with the development of the strategic port.

ICOMOS considers that the primary interesting feature of the nominated property is the large ensemble of modernist buildings that create a dense, multifunctional, vibrant city within a traditional street-and-square planning framework.

ICOMOS appreciates the work done by the State Party to research and document the nominated property and to produce informative additional information.

Criterion (iv) has been justified but criterion (ii) has not been demonstrated. The conditions of authenticity have been met whereas the conditions of integrity have only been partly met. At this stage, the proposed boundaries of the nominated property do not include all the attributes that could provide more complete evidence of the planning principles adopted in developing the new port city. In addition, the exclusion of the contextual waterfront port industry, important landscape features, and satellite residential districts from the buffer zone makes it difficult to perceive the full scale of interwar modernist development of the city.

The protection of the nominated property appears to be adequate, though further clarification is needed regarding the rationale underpinning the buffer zone as well as the legal provisions that apply there. The management of the nominated property is satisfactory.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the nomination of Gdynia. Early Modernist City Centre, Poland, be **referred back** to the State Party to allow it to:

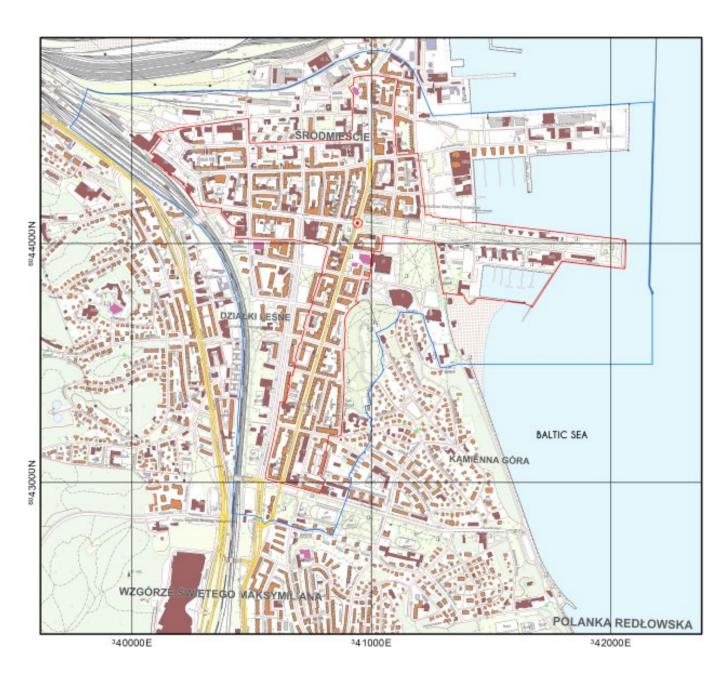
- Re-examine the delineation of the boundaries of the nominated property to ensure they are consistent, systematic and include additional attributes that support the proposed Outstanding Universal Value, namely the Post Office and Sorting Hall at the Konstytucji Square, the former Swedish Sailor's Church, and the historic row of attached houses for fishermen on Jerzego Waszyngtona Street,
- Clarify the rationale for the delineation of the buffer zone, and consider including the contextual waterfront port industry and water bodies towards the south and the east of the Baltic Sea, as well as the entire Kamienna Góra residential area, so that the scale of the interwar modernist development of the city is more easily perceived,
- Ensure that the legal provisions applicable to the buffer zone effectively provide an additional layer of protection to the nominated property,
- Identify more precisely the key attributes that support the proposed Outstanding Universal Value and form the focus of protection, conservation, and management actions;

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Implementing the key measures of the management plan as soon as possible,
- Reviewing the state of the inner courtyards, whose auxiliary outbuildings make it difficult to perceive the original idea of open "green" spaces, and planning the removal of these auxiliary outbuildings accordingly,
- c) Establishing an inventory of historical interiors of registered state and municipal monuments that are accessible to the public (such as semi-public entrance areas, foyers, stairwells, common areas, etc.),
- d) Developing a strategy for the conservation of earlier gable-roofed houses, and integrating it into the conservation plan for the nominated property,
- e) Providing additional evidence and documentation of the participatory consultation process, including on how the complex private ownership issue that characterises the nominated property is being addressed as part of this consultation process,
- f) Developing and implementing as soon as possible a Heritage Impact Assessment mechanism for development proposals (such as, inter alia, the Nova Marina Gdynia project, the development at the base of South Pier, the development in Żeromskiego Street, and the development near the "InfoBox – Observatory of Change"), before any irreversible decisions are taken,
- g) Informing the World Heritage Centre of the intention to undertake or authorise all major projects which may affect the proposed Outstanding Universal Value of the nominated property, in line with paragraph 172 of Operational Guidelines for the Implementation of the World Heritage Convention.

ICOMOS recommends that the name of the nominated property be changed to: "Gdynia Modernist City Centre".



Map showing the boundaries of the nominated property

Álvaro Siza's Architecture (Portugal) No 1737

1 Basic information

Official name as proposed by the State Party

Álvaro Siza's Architecture: A Modern Contextualism Legacy

Location

Boa Nova Tea House and Restaurant; Ocean Swimming Pool

Matosinhos Municipality

Porto District

Bouça Housing Complex; Faculty of Architecture of the University of Porto; Serralves Museum of Contemporary Art

Porto

Porto District

Santa Maria Church and Parish Centre Marco de Canaveses Municipality Porto District

Alves Costa House Caminha Municipality Viana do Castelo District

Portuguese Pavilion Lisbon Lisbon District

Portugal

Brief description

Eight buildings and building ensembles in Portugal designed by architect Álvaro Joaquim de Melo Siza Vieira during the second half of the 20th century testify to the evolution of the Modern Movement in architecture's principles towards a contextual approach that integrates local references with global models. These are the Boa Nova Tea House and Restaurant in Matosinhos; the Ocean Swimming Pool in Matosinhos; the Alves Costa House in Caminha; the Bouça Housing Complex in Porto; the Faculty of Architecture of the University of Porto in Porto; the Santa Maria Church and Parish Centre in Marco de Canaveses; the Portuguese Pavilion in Lisbon; and the Serralves Museum of Contemporary Art in Porto. Modern in form, each also demonstrates a strong sense of coherence with its specific architectural, environmental, historical, and socio-cultural contexts.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a

serial nomination of eight monuments and groups of buildings.

Included in the Tentative List

31 January 2017 as "Ensemble of Álvaro Siza's Architecture Works in Portugal"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 30 June to 6 July 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 11 October 2024 requesting further information about the selection of component parts, integrity and authenticity, and protection and management of the nominated property.

Additional information was received from the State Party on 18 November 2024.

An interim report was provided to the State Party on 20 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested on the justification for inscription, description of the component parts, integrity and authenticity, and comparative analysis.

Further clarification was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property is composed of buildings and building ensembles designed by Álvaro Joaquim de Melo Siza Vieira (internationally known as Álvaro Siza). Born in 1933 in Portugal, Siza is a renowned architect who currently lives, works, and teaches architecture in Porto. His oeuvre consists of more than five hundred projects and built structures located primarily in Portugal, but also in Germany, The Netherlands, Italy, Spain, Belgium, Argentina, and Brazil.

Eight component parts located in Portugal are considered representative of Siza's 20th-century architectural legacy: the Boa Nova Tea House and Restaurant (1958-1963), the Ocean Swimming Pool (1960-1961; 1962-1965; 1966-1973; 2018-2021), the Alves Costa House (1964-1971), the Bouça Housing Complex (1973-1977; 2000-2006), the Faculty of Architecture of the University of Porto (1985-1987; 1987-1994), the Santa Maria Church and Parish Centre (1994-1996; 2004-2006), the Portuguese Pavilion (1995-1998), and the Serralves Museum of Contemporary Art (1991-1999; 1998-2002 [Villa]; 2013-2019 [Cinema House]; 2022-2024 [Álvaro Siza Wing]). These comprise examples of public-use buildings, social housing, a private house, a museum and exhibition areas, university buildings, a teahouse and restaurant, a swimming pool, and a church.

According to the nomination dossier, Álvaro Siza's architecture is modern in form while at the same time deeply rooted in tradition and context, which encompasses existing physical elements, immediate and wider settings, building traditions and cultures, social structures, local traditions and habits. The main design characteristics of his buildings include simple juxtaposed geometric shapes and forms that are integrated into their surroundings, exposed or whitewashed concrete walls that in some cases are covered by ceramic tiles or granite panels, and extensive use of wood in the construction and finishing of the interiors.

In this way, Siza's architecture responded to growing post-Second World War criticism of Modern Movement buildings, whose disregard for their contexts began to be called into question by architects, historians, and critics of architecture, primarily in Europe. At the forefront of this revisionist process was the Italian architect and historian Bruno Zevi (1918–2000), who in 1945 published *Verso un'architettura organica* ("Towards an Organic Architecture") in which he also re-evaluated and highlighted American architect Frank Lloyd Wright's work. Finnish architect Alvar Aalto (1898–1976) was also seen at the time as a leading proponent of the new contextual Modernist architecture.

Siza defines contextuality in a specific way: he argues that an architect is responsible not only for harmonising structures with their various contexts, but also for opposing them and even, at times, for pursuing both options simultaneously, separating one from the other in different parts of the same work. This results in a very individualistic approach to each specific location and design, in order to represent a given moment in time and space in which the work is realised. It additionally results in connecting that very moment to the past in a process of continuous transformations over time – such as with the constantly evolving Serralves Museum component part.

Boa Nova Tea House and Restaurant

The Boa Nova Tea House and Restaurant is located along the rocky Atlantic Ocean coastline in Leça da

Palmeira, in the north of Matosinhos Municipality, near

The component part was part of a redevelopment of Leça da Palmeira's seaside. It was a result of public competition organised by the Matosinhos Municipality, won by Fernando Távora's studio in 1956. Siza, who collaborated with the studio, created the design in 1958. The construction of the building took place between 1959 and 1961 and it opened to the public in 1963.

Built partially into the ground on the east side, the building is composed of three volumes that open to the west to the surrounding rocky landscape and ocean, and features a flat roof and a sculptural chimney. The multi-level building has two main spaces, a tea room and a dining room. In addition to modern techniques and materials such as reinforced concrete, the building includes elements of traditional architecture such as its tiled roof.

Ocean Swimming Pool

The Ocean Swimming Pool is also situated in Leça da Palmeira in Matosinhos Municipality, about 1.5 kilometres from the Boa Nova Tea House and Restaurant component part.

The first construction phase of the public swimming pool commissioned by the Matosinhos administration began in 1960. It was led by the engineer Bernardo Ferrão, with the collaboration of Siza, who assumed full coordination from 1961 until completion of construction. The swimming pool was officially opened in 1965.

The Ocean Swimming Pool was built with the least amount of alteration to the as-found site, using the natural rocks and a pre-existing retaining wall. It is integrated into the horizontal landscape by means of a linear composition of volumes and by maintaining visual continuity between land and sea. The building complex comprises an adults' pool made of cyclopean concrete walls and embedded in the rocks, a children's pool, sunbathing platforms, changing rooms, bathrooms, and a bar with a terrace area. Construction materials are mainly exposed concrete, pine wood, copper, and brass. Light plays a crucial role in its spatial experience.

The contemporary bathing complex results from several construction phases. The first phase (1960–1961) envisaged the construction of a single tidal pool; the second phase (1962–1965) encompassed two pools (one for adults and one for children) with a curved wall and retaining walls, platforms, and pathways to the swimming pools as well as the facilities for water treatment and distribution. The third phase (1966–1973) included the bar and some auxiliary rooms and structures. The most recent phase (2018–2021) included a new extension to the north.

Alves Costa House

The Alves Costa House is located in the wooded residential neighbourhood of Moledo do Minho in the

municipality of Caminha, situated near the mouth of the Minho River. The house was commissioned by Henrique Fernando Alves Costa in 1964, designed by Siza and completed in 1971.

This detached single-family house closely follows the contour of the irregularly shaped polygonal plot. The building is closed toward the street by almost blind walls, and has rooms with floor-to-ceiling windows opening to a courtyard. The house is divided into three zones, with the living room and entrance in the central zone. The choice of materials and construction processes reflect a concern for economy as well as quality. The use of concrete was minimised in this case.

Bouça Housing Complex

The Bouça Housing Complex is located in central Porto, between the light-railway tracks and Boavista Street. It was designed by Siza in 1973–1977 as part of the Local Ambulatory Support Service, a government-led collaborative initiative among architects that engaged with future occupants in need of affordable housing. The construction process was interrupted in 1978 with only one-third of the designed housing blocks completed. It was finally concluded, after some changes to the original design, in 2000–2006.

Recalling aspects of traditional housing, the complex consists of four parallel four-storey blocks with open courtyard spaces between them. There are 128 two-storey apartments, mostly with three bedrooms. Each apartment can be accessed directly from the exterior through common spaces between the blocks at the ground level, or through a second-storey gallery. Originally designed as affordable communal housing, it is now mostly inhabited by young middle-class residents.

Faculty of Architecture of the University of Porto

The Faculty of Architecture of the University of Porto is situated in Massarelos and Lordelo do Ouro in the western part of Porto. It is on the former grounds of the 19th-century Quinta da Póvoa estate on the terraced northern bank of the Douro River. Before the architecture faculty was located there, this area underwent radical transformations due to the construction of the Arrábida Bridge in 1963 and its related access roads.

Development of the site followed a decision to separate the Faculty of Architecture from the School of Fine Arts. The faculty's campus was designed and constructed in 1985–1993 in two successive phases. The first phase included the construction of the Carlos Ramos Pavilion in an open trapezoidal shape embracing a patio, and the conservation of the surviving elements of the Quinta da Póvoa estate comprised of the Pink House (Casa Cor de Rosa) and its stables. During the second phase between 1987 and 1993, the main building and other structures were erected and the final spatial integration was done under the supervision of Siza, with the intent of responding to and merging the complex into the existing

context. The functional programme of the campus is divided between different buildings and their parts.

The main campus building is a multi-volume structure built with modern technologies and materials. The north part is designed as a solid mass and protects the site from street noise. The four towers to the south, connected by a semi-underground gallery, allow views down to the river.

The Faculty of Architecture of the University of Porto is seen as the embodiment of the so-called "Porto School", considered by some to be among the leading design schools of the 20th century.

Santa Maria Church and Parish Centre

The Santa Maria Church and Parish Centre is in Marco de Canaveses, a municipality in the District of Porto fifty kilometres east of Porto. The complex was built in two phases: from 1994 to 1996 the Santa Maria Church with a mortuary chapel underneath was constructed; later, from 2004 to 2006, the Parish Centre and adjacent Priest House were built.

Located on a slightly elevated platform, the church is characterised by an austere, minimalist design. It has a thirty-metre-long rectangular nave entered via ten-metre-high doors flanked by two volumes resembling towers. The building has whitewashed concrete walls that contrast with fittings of natural materials. Natural light plays an important role in the perception of the space.

Portuguese Pavilion

The Portuguese Pavilion (1995–1998) was designed for the Expo '98 World's Fair in Lisbon. It sits by the Tagus River waterfront on Oceanos Avenue by the site of a former industrial harbour.

The Pavilion, constructed of reinforced concrete, has two main spaces: a covered exterior ceremonial square, and a modular two-storey exhibition hall characterised by a simple form and organised around a patio. During the World's Fair, the interior of the hall was curated in collaboration with Eduardo Souto de Moura. The ceremonial square is sheltered by a large-span parabolic concrete canopy measuring 65 by 58 metres, a catenary structure that serves as the dominant feature of the architectural composition. For this building, Siza worked closely with the structural engineer Ove Arup (and engineer Cecil Balmond) and the Portuguese engineer Segadães Tavares.

The Portuguese Pavilion was left abandoned for many years after the World's Fair. In 2015 ownership of the building was transferred to the University of Lisbon. An adaptive reuse project is currently being executed, partly with Siza's involvement.

Serralves Museum of Contemporary Art

The Serralves Museum of Contemporary Art component part lies within the boundaries of a historic estate in the

western part of Porto. It comprises the museum facilities and the remnants of earlier developments, along with an Art Deco villa (1925–1944). The museum is located on the estate's former vegetable garden and orchard.

Siza started working on a design for the museum in Serralves Park in 1991. The construction of the building lasted from 1996 to 1999. At the same time, Siza collaborated on the conservation of the villa (1998–2002) and then on an extension of its auxiliary buildings to host the Casa do Cinema Manoel de Oliveira (2013–2019), located within the boundaries of this component part. More recently, a new Álvaro Siza Wing has been added to the museum. It opened to the public in 2024 as an autonomous volume connected to the existing museum galleries by a bridge, designed by Siza.

The museum building shows a balance between corridors and exhibition spaces with experience-oriented communication along the building on the entrance level. On the other floors there are multipurpose rooms, a library, and a 290-seat auditorium with its own exterior access. The other buildings and areas located within the boundaries of the component part are not described in the nomination dossier.

Due to the conceptualisation and the timeframe of the nomination adopted by the State Party, other buildings and elements located within the proposed boundaries of the component parts of the nominated property are not mentioned or described in the nomination dossier. It raises questions concerning the completeness of the description and the adequacy of the boundaries and consequently of the integrity of some component parts.

The area of the eight component parts totals 22.54 ha, with buffer zones totalling 96.90 ha.

State of conservation

Overall, the state of conservation of the nominated series is good. Most of the component parts have undergone interventions that were supervised by Siza himself.

The state of conservation of the Boa Nova Tea House and Restaurant is good as a result of interventions for repairs, conservation of original materials, and technical upgrading undertaken in 1991, 2002 and 2012–2014. All conservation interventions were supervised by Siza. Since its reopening in 2014, the building has been in use solely as a restaurant. The previously subdivided tea house/restaurant kitchen spaces have been united and provided with modern equipment.

The Ocean Swimming Pool is currently in a good state of conservation due to the conservation and repair interventions undertaken in 1993 and 2018, both supervised by Siza and completed in 2021, which were respectful of the original design and materials. They were needed to replace obsolete plumbing and upgrade the structure to current standards.

The Alves Costa House is in continuous use by a private owner who has undertaken systematic maintenance works. While needing some current and future repairs, it can be considered to be in a good state of conservation. The surrounding garden walls and pavement around the house need more substantial interventions.

The Bouça Housing Complex is in a fair to good condition since the completion of its second phase of construction in 2006. This included conservation of the existing buildings and completion of the unfinished blocks foreseen in the original design, as well as functional and technical improvements to meet contemporary needs, including improved construction technologies and the addition of an underground parking garage. It should be noted that changes made to the original design of 1973 are significant. According to the State Party, the changes were all done under the supervision of Siza and the heritage protection authorities. The private owners of dwelling units have formed the Águas Férreas Condominium association, which is responsible for the maintenance and conservation of the buildings. The architectural coherence of the complex is maintained. Appropriate attention will be needed for future repairs or cleaning.

The buildings of the Faculty of Architecture of the University of Porto are in a good state of conservation due to the recent renovation works on the main building and the Carlos Ramos Pavilion. The interventions included, *inter alia*, partial replacement of the roof, window frames, and zinc sheets, and upgrading of technical installations. All new elements replacing the old ones were carefully replicated.

The Santa Maria Church and Parish Centre ensemble is in a very good state of conservation, both exterior and interior, without visible signs of ageing or graffiti, due to renovation works completed in 2023.

Credible assessment of the state of conservation of the Portuguese Pavilion is not possible at this time. The Pavilion is currently the subject of an adaptive re-use project. The interiors have been stripped of fittings and furnishings to permit the conservation work. Technical installations are being implemented to comply with present-day requirements, and new tribunes are being constructed inside the future auditorium, in line with Siza's recent drawings.

The museum building in the Serralves Museum of Contemporary Art is in a good state of conservation. The state of conservation of the other buildings within the boundaries of the component part as well as the historic park in which they are located was not evaluated because the State Party has not included them in the nominated property.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is satisfactory.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressures and environmental pressures, including the effects of climate change.

Due to the locations of some of the component parts in built-up areas, development pressures are potentially a significant factor, with different possible impacts for each. The shutdown of the Petrogal oil refinery in Porto in 2021 raises the possibility of future redevelopment of that area, specifically in the cases of the Boa Nova Tea House and Restaurant and the Ocean Swimming Pool component parts.

The expansion of the light-rail system and metro of Porto has precipitated the construction of a new bridge over the Douro River, planned for completion in 2025. The bridge is near the Faculty of Architecture of the University of Porto component part and thus has a significant impact on the immediate setting. A Heritage Impact Assessment has been developed to inform decision makers. Further development of the light-rail system of Porto may also have an impact on the Bouça Housing Complex.

Some of the component parts in maritime locations face significant environmental pressures, being particularly exposed to chloride action and the effects of climate change such as rising water levels and high tides. Reinforced concrete, the main construction material of many component parts, is sensitive to environmental factors and atmospheric CO₂ concentrations. The increase in CO2 levels associated with global warming is expected to increase the likelihood of carbonation-induced corrosion of rebar in reinforced concrete. The penetration of chlorides into concrete structures also increases the likelihood of rebar corrosion, which seriously affects the load-bearing capacity of structural elements. Environmental impacts are concerns in all component parts, but are most serious in the cases of the Boa Nova Tea House and Restaurant and the Ocean Swimming Pool in Matosinhos Municipality, and the Portuguese Pavilion in Lisbon, due to their locations.

ICOMOS considers that the state of conservation is satisfactory and that factors affecting the nominated property are under control though potentially of concern.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

 The selected works of architect Álvaro Siza are an outstanding expression of developments in architecture in the second half of the 20th century.

- These buildings and ensembles in Portugal showcase a critical revision of the Modern Movement principles towards a more contextual and humanistic approach.
- These buildings and ensembles illustrate the exceptional legacy of Álvaro Siza's architectural works in terms of their sculptural and volumetric expressions and spatial experiences, their multi-scalar approach with impressive relationships between the whole and the parts, their status as "total works of art", and their merging of the internationalist influences of the Modern Movement with classical traditions, technological innovations, geometrical rigour, and vernacular architecture in deep connection with their landscapes and communities.
- These selected buildings and ensembles testify to Siza's "school" of architecture, which had a major impact across different generations of architects working in various continents, respecting the needs and aspirations of local populations.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are presumed to be the elements and features that express an architecture that is responsive to its physical, social, and historical context; that exhibit the integration of international and local references; that include sculptural volumetric expressions; that have oriented spatial experiences; and that can be considered "total works of art" in terms of details, furnishing, and artworks. Each component part expresses these key attributes in its own individual way.

The nominated property is framed within the debate that took place during the second half of the 20th century over the foundational principle of non-contextual universality of the Modern Movement. The component parts have been presented as evidence that the Modernist works of Siza, in contradistinction to placelessness, have very personal and contextual characteristics. Nevertheless, it is not shown precisely how they derived from that debate, or in what way the nominated series as a whole, or in its individual component parts, took part in the discussion on Modernism and critically responded to its foundational principles.

ICOMOS also observes that the term "legacy" is used in the proposed name of the nominated property and in the proposed justification for inscription. The term suggests that there are potentially other sites (or the works of other architects) that may also represent a legacy of modern contextualism, this being a broad and vague concept.

In the case where a nominated property is intended to represent the legacy of a particular architect, it should be underlined that the World Heritage Convention is a property-based instrument. As such, nominated properties must demonstrate Outstanding Universal Value through their tangible (and intangible) attributes. They should illustrate key aspects of human development over a defined period or represent a significant stage in human history within a specific cultural or thematic

context, rather than serving solely as a representation of the achievements of an individual.

ICOMOS raised the above issues in its interim report. In response, the State Party cited Kenneth Frampton's definition of modern contextualism in his book *Modern Architecture, A Critical History* (1985) as "an alternative revisionist path", and as "a form of 'resistance' against postmodern culture's superficial and scenographic tendencies". The State Party also included other architects' observations that Siza's early works have a "hypersensitivity in relation to the environment". The State Party does not present modern contextualism as a style or tendency, but as a personal approach to architecture.

Comparative analysis

The comparative analysis has been developed on the basis of chronological, geographical, and national frameworks ("national" being defined by the State Party as all Portuguese cultural properties currently on the World Heritage List). It has examined properties throughout the world inscribed on the World Heritage List and included in the Tentative Lists of States Parties. The State Party observes that there is an inadequate representation of properties from the 20th century in both these lists.

The analysis includes qualitative assessments as well as a tabular quantitative summary.

Fifty-three properties on the World Heritage List and in the Tentative Lists that were considered as 20th-century heritage were selected for a screening study. Fourteen serial properties were then selected for in-depth comparisons with the nominated property. An overview of all cultural World Heritage properties in Portugal was also included. Identified as the most meaningful comparisons for this serial nomination were The Architectural Work of Le Corbusier, an Outstanding Contribution to the Modern Movement (Argentina, Belgium, France, Germany, India, Japan, Switzerland, 2016, criteria (i), (ii) and (vi)); The 20th-century Architecture of Frank Lloyd Wright (United States of America, 2019, criterion (ii)); and The Architectural Works of Alvar Aalto – a Human Dimension to the Modern Movement (Finland, Tentative List).

The State Party concluded that the unique and exceptional features of the nominated property include not only physical and formal attributes, but also intangible attributes such as a deep connection with its social, cultural, and historical contexts and with its local communities. According to the State Party, the comparative analysis demonstrates how the nominated property would contribute positively to enhancing the representativeness, balance, and credibility of the World Heritage List.

The comparative analysis also includes an overview of sixty designs realised by Siza in the 20th century. This overview draws on a "Survey of 20th-century Portuguese Architecture" (*Inquérito à arquitectura portuguesa do*

século XX – IAP20) produced between 2003 and 2006 by the Portuguese Order of Architects. The State Party justifies the selection of the eight component parts for their contribution to the development of architecture, and for their unique combination of different typologies, scales, and uses responding to contemporary needs for housing, worship, work, education, and leisure. The comparative analysis concludes with a brief text by the noted architectural historian and critic Kenneth Frampton entitled "Criteria and Substance in the Work of Álvaro Siza".

ICOMOS considers that the comparative analysis is limited and does not cover all the relevant fields of comparison needed to assess the significance of the nominated property. The analysis should include comparisons with the works of other architects who were contemporaries of Siza and who also took a critical approach to Modern Movement principles, or those who also employed similar architectural forms of expression and spatial approaches. These could include, among others, the works of Luis Barragán (Luis Barragán House and Studio (Mexico, 2004, criteria (i) and (ii)); Oscar Niemeyer (Brasilia (Brazil, 1987, criteria (i) and (iv)); Pampulha Modern Ensemble (Brazil, 2016, criteria (i), (ii) and (iv)); Rachid Karami International Fair-Tripoli (Lebanon, 2023, criteria (ii) and (iv)); Juan O'Gorman, and Hassan Fathy. Comparisons with more works by contemporaries of Siza would have greatly enriched the analysis and supported a better understanding of the influence Siza may have had on contemporary approaches to design. This is essential for establishing the significance of his works and situating them within a period when the foundational principles of the Modern Movement were being reconsidered.

ICOMOS also considers that the nominated property is relatively recent from a historical point of view and from a heritage conservation perspective. Some component parts have only very recently been completed or expanded. This does not permit the historical distance or perspective that would be preferred for a balanced and informed assessment of the proposed Outstanding Universal Value of the nominated property.

As for the completeness of the nominated property, the State Party indicates that ten other works by Siza have already been identified as potential future extensions, and therefore would seem to suggest an open-ended serial transnational nomination. The prospective future component parts are the Beires House (Póvoa de Varzim, Portugal, 1973); Malagueira Housing Complex (Évora, Portugal, 1977); Banco Borges & Irmão (Vila do Conde, Portugal, 1978); Avelino Duarte House (Ovar, Portugal, 1980); Teachers Training College (Setúbal, Portugal, 1986); reconstruction of the Chiado area (Lisbon, Portugal, 1988); Schlesisches Tor Residential Complex (Berlin, Germany, 1980) Schilderswijk Housing Complex (The Hague, The Netherlands, 1981); Galician Centre of Contemporary Art (Santiago de Compostela, Spain, 1986); and Iberê Camargo Foundation Museum (Porto Alegre, Brazil, 1998). The comparative basis on which these works were chosen is not clear.

In its interim report, ICOMOS requested clarification of the comparative basis for selecting the component parts, and at the same time asked whether the State Party had considered a much smaller nomination of one or two of Siza's early buildings as exemplars of a new architectural direction. In its response, the State Party confirmed that a new revisionist approach to the Modern Movement's principles as expressed by Siza could be demonstrated through two component parts initiated at the beginning of his career in the 1950s and 1960s: the Boa Nova Tea House and Restaurant, and the Ocean Swimming Pool. The Alves Costa House and/or the Faculty of Architecture of the University of Porto might also be considered relevant examples.

ICOMOS does not consider that the comparative analysis justifies consideration of this property for the World Heritage List at this stage.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii) and (iv).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the nominated property is an outstanding expression of the exchange of values in the development of architecture during the second half of the 20th century, and an exemplification of a critical revision of the Modern Movement. The State Party claims that, through his works, Siza provided an alternative contextual and humanistic architecture that was strongly responsive to social, physical, and historical contexts. The component parts illustrate the merger and integration of international influences and technological innovations of the Modern Movement with local traditions and vernacular architecture across various functional typologies. The State Party argues that, along with his pedagogical activity, Siza's works have had a significant impact on architects worldwide and thus on developments in architecture.

ICOMOS considers that the State Party has not provided sufficient evidence to demonstrate how, the individual component parts, or the series as a whole, concretely and tangibly reflect an interchange regarding modern architecture, or react to the underlying principles of the Modern Movement. It also lacks a clear analysis of how the design solutions relate to the principles of Modernist architecture. Therefore, it is unclear how this contextual approach connects to or advances the principles of the Modern Movement, and how it illustrates an exchange of values. Furthermore, the influence Siza's architecture on contemporary approaches to design and its role in the critical approach to the Modern Movement principles are not clearly demonstrated, nor has a specific timeframe for this interchange of values been specified.

ICOMOS considers that this criterion is not demonstrated at this stage.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that the nominated property showcases multiple typologies from small- to large-scale works, private and public, with cultural, recreational, educational, residential, and religious uses. The common features of the component parts are their original and unique sculptural and volumetric expressions alongside focused and oriented spatial experiences. The State Party claims that the legacy of Siza showcases impressive relationships between the whole and the parts, modern and traditional. Highlighted are the sculptural expression of his buildings, the spatial experiences oriented toward movement and light, and the multi-scalar attention to detail, making his buildings "total works of art" that reinterpret Portuguese construction traditions with modern solutions.

ICOMOS considers that the intent of this criterion is to focus on the outstanding nature of the typology of a property, nominated in the context of the defined typology illustrating one or more significant stages in history. The nominated property must therefore be a defined type of property, and the stage in history – and its repercussions – must be deemed of outstanding importance. This stage should be defined in terms of cultural history, taking into account the patterns of continuity and change within that historical context.

The justification for this criterion does not adequately address how the typology, or the presumed stage in history, can be considered outstanding. The nominated series represents a wide range of building typologies from residential and religious to recreational and educational with little typological interconnectedness other than, perhaps, the authorship of their designs. Similarly, the stage in history, presumed to be the mid-20th-century transition of the Modern Movement in architecture from a globalist to a contextualist approach, has not been adequately identified or demonstrated to be of outstanding importance in and of itself.

ICOMOS considers that this criterion is not demonstrated at this stage.

ICOMOS does not consider that any of the criteria have been justified at this stage.

Integrity and authenticity

Integrity

The integrity of the nominated property is based on selected buildings and building ensembles of various types in Portugal, designed by architect Álvaro Siza during the second half of the 20th century, that testify to an evolution of the Modern Movement in architecture toward a contextual approach that integrates local references with global models. As a serial nomination, consideration must also be given as to whether the component parts, individually and collectively, contain all the attributes necessary to express in a substantial way the proposed Outstanding Universal Value of the nominated property as a whole, and how each component part contributes to that value. Integrity is furthermore a measure of the intactness of the attributes.

The nomination dossier focuses on a series of works by Siza located in one country, Portugal. ICOMOS does not consider that the nominated series convincingly represents the completeness of Siza's architecture as "A Modern Contextualism Legacy" in terms of place and significance. The use of the term "legacy" in relation to a still-active architect also gives reason to critically reflect on the coherence of the eight selected component parts that together span a period of about six decades. This question is all the more pertinent given that some of these components are still under development, under Siza's direct supervision, or have only recently been completed. In addition, the inclusion or exclusion of pre-existing buildings (originally not designed by Siza) and extensions are not always consistently discussed in the nomination dossier. This raises questions about the integrity of the nominated series, and challenges the proposed delineation of the boundaries.

The main factors affecting the nominated property are development and environmental pressures, together with the effects of climate change. These are largely under control. Nevertheless, ICOMOS considers that, over time and with the transformation of the surroundings of individual component parts, it may become difficult to maintain legibility of their spatial relations, relationships that constitute an essential aspect which influenced the compositional and material choices made by Siza.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and integrity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated at this stage.

Authenticity

The authenticity of the nominated property is based on how the attributes of the proposed Outstanding Universal Value convey their value in terms of the forms, designs, materials, uses, locations, and settings of the nominated property as a whole and in each component part. ICOMOS considers that in terms of form and design, materials and function, techniques, location and setting, as well as spirit and feeling, the component parts of the nominated property, despite some adaptations to present-day requirements and necessary renovations, are to a high degree original, and most of them individually meet the conditions of authenticity.

However, the selection of elements to represent the attributes of the proposed Outstanding Universal Value makes it difficult to assess the authenticity of the nominated series. The Faculty of Architecture of the University of Porto and the Serralves Museum of Contemporary Art are the most noticeable examples in that respect.

In addition, the involvement of Siza in the expansion of some of the component parts (the Bouça Housing Complex and the Serralves Museum of Contemporary Art, among others) is problematic as it leaves the creation process open-ended, and generates a vague reference point for assessing the degree of authenticity of the component parts from the perspective of heritage and its conservation.

Since the criteria for justifying the proposed Outstanding Universal Value have not been demonstrated at this stage, attributes of Outstanding Universal Value cannot be confirmed and authenticity, as defined by the Operational Guidelines for the Implementation of the World Heritage Convention, is not demonstrated at this stage.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have not been met at this stage.

Boundaries

The component parts of the nominated property coincide with ownership or administrative boundaries, except for the Faculty of Architecture of the University of Porto and the Serralves Museum of Contemporary Art component parts, where the boundaries cover a wider area and include additional structures and spaces whose status in the context of this nomination is not clear.

The component parts of the nominated series comprise both private and public properties located in urbanised areas. There is no information available on the number of permanent inhabitants in each component part, nor the number of inhabitants in their buffer zones.

The boundaries of both the Boa Nova Tea House and Restaurant and the Ocean Swimming Pool component parts and their single buffer zone coincide with those delineated when they were classified as National Monuments. Both boundaries are rather restricted. In addition, the Ocean Swimming Pool boundary is not clear with regard to the northern extension that was completed in 2021.

The boundary of the private Alves Costa House component part is defined by its urban plot. The buffer zone includes individual plots surrounding it. It should take into account the fact that the area is subject to development pressure.

The boundary of the Bouça Housing Complex component part coincides with the urban plot that belongs to the Águas Férreas Condominium (the association of owners of the Bouça Housing Complex).

The boundary of the Faculty of Architecture of the University of Porto component part encompasses the campus area. The buffer zone largely follows the plot lines of the land that is owned by the faculty. The north area should better follow the topography and integrity issues should be addressed.

The boundary of the Santa Maria Church and Parish Centre component part includes the church, the parish centre building, and the adjacent area. The boundary and the buffer zone, which covers a vast area, are the same as for the registered Monument of Public Interest.

The boundary of the Portuguese Pavilion component part includes the pavilion building and its covered Ceremonial Square as one entity, and two adjacent areas with walled gardens as secondary parts. The buffer zone includes the Atlantic Pavilion (now MEO Arena, formerly Altice Arena) and the Lisbon Oceanarium, as well as a large zone to the east extending to the Tagus River, ensuring unobstructed views from the Pavilion towards the river and the former dock. The western border of the buffer zone is limited to the street, thus excluding the adjacent buildings farther west.

The boundary of the Serralves Museum of Contemporary Art component part coincides with the entire territory of the Serralves Park, which is registered as a National Monument. More articulation and specification are needed for elements with heritage and contemporary architectural values, aside from landscape value. A wide buffer zone encompasses the surrounding built-up area of Porto. It should take into account the high rate of urban development.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that it has not been demonstrated how the nominated property is a response to or an illustration of Modernism's foundational principles. The relatively recent completion dates of some component parts are a concern. At this stage, the comparative analysis does not justify consideration of the nominated property as proposed, nor have any of the criteria been justified. The conditions of integrity and authenticity have not been met at this stage, and certain boundaries and buffer zones may need to be reassessed.

4 Conservation measures and monitoring

Documentation

Except for the Alves Costa House, all the component parts have been entered in the State Party's Architectural Heritage Inventory System (*Sistema de Inventário do Património Arquitectónico – SIPA*). All the component parts have been included in the "Survey of 20th-century Portuguese Architecture" of the Portuguese Order of Architects.

The vast archive of Siza's architectural plans, drawings, models, and correspondence is currently spread over different locations, including at the Álvaro Siza Office in Porto, the Álvaro Siza Fonds of the Canadian Centre for Architecture in Montréal, the Documentation Centre of Urbanism and Architecture at the Faculty of Architecture of the University of Porto, the Serralves Foundation in Porto, the Álvaro Siza's Archive of the Calouste Gulbenkian Foundation in Lisbon, the Drawing Matter's Archive at Shatwell Studios in Wincanton, United Kingdom, as well as the Municipal Archives in Matosinhos and Caminha.

Relevant conservation or maintenance plans were developed for the numerous conservation interventions and adaptation works. They and other documentation for all past interventions, except for the privately owned Alves Costa House, Bouça Housing Complex, and Santa Maria Church and Parish Centre component parts, are housed variously at the Municipal Council of Matosinhos, the Faculty of Architecture of the University of Porto, the Municipal Archive of Lisbon, the Museum of Lisbon, and the Serralves Foundation Archives.

Under the ongoing "Siza ATLAS: Filling the gaps for World Heritage" research project funded by the State Party through its Foundation for Science and Technology, documentation has been developed for all the component parts. The documentation includes technical details about materials and construction from both the original designs, and from recent interventions. It also includes the underlying design principles as a reference for future conservation works.

ICOMOS considers that large amounts of systematically archived documentation exist for the individual component parts, but this documentation is not centrally held or managed for the nominated property as a whole, nor is it integrated into a widely accessible database that can provide solid baseline documentation for future management, conservation, and monitoring initiatives and decisions concerning the nominated property.

Conservation measures

Most of the component parts of the nominated series have undergone conservation and/or adaptation interventions in recent years. Relevant conservation and maintenance plans or adaptation documentation were developed by Álvaro Siza or under his supervision. Most interventions are repairs related to normal wear and tear or to changing standards such as seismic, acoustic, thermal, and

accessibility upgrades. The exception is the Alves Costa House component part, which has been maintained by its private owner continuously since its construction, with an understanding of its value and of appropriate conservation practices, but without any conservation plan *per se*.

ICOMOS considers that there is a need to define and implement specific guidelines for the conservation of each component part of the nominated series, and to keep all relevant records (maintenance, conservation, adaptation) easily accessible when needed, preferably on site. The documentation of the conservation measures and various interventions at the Ocean Swimming Pool component part could serve as a standard for other component parts.

Monitoring

A monitoring framework has been proposed in the draft management plan for the nominated property, supported and detailed by draft documents for the individual component parts. The draft monitoring framework includes the factors that affect each component part, as well as indicators relevant to its context. The monitoring framework is planned to be implemented in the future by the respective component part managers.

ICOMOS considers that the proposed framework is well considered, and when implemented, it will support management of the nominated property with concrete and relevant data in a fundamental way.

ICOMOS considers that conservation measures are satisfactory and effective. Adopted principles and a good standard of restoration works are consistent throughout the nominated property and over time.

5 Protection and management

Legal protection

The key national legislative instruments are the Law for Cultural Heritage (Law no. 107/2001), which establishes the foundations of the policy and regime for the protection and enhancement of cultural heritage, and the associated Decree (Decree-Law no. 309/2009), which defines the procedure for classifying immovable cultural property, the regime for protection zones, and the rules for drawing up a detailed protection plan.

The process of classification as a National Monument, which enables the highest level of protection, is the responsibility of the Council of Ministers and is confirmed by Government Decree. The monuments are classified and protected by the Portuguese General Directorate of Cultural Heritage. Each registered property is automatically assigned a 50-metre-wide general protection zone (buffer zone) to protect views and its landscape and architectural setting. Moreover, according to Portuguese law, properties inscribed on the World Heritage List are directly integrated into the list of National Monuments.

In a registered property, it is forbidden to perform any work, intervention or change of use, either inside or outside the building, without prior consent from the competent Regional Coordination and Development Commission, with a binding decision subsequently made by the General Directorate of Cultural Heritage. In the buffer zone, authorisation has to be obtained for constructions and any other works that alter the topography, alignments, height, and, in general, the distribution of volumes and roofs or the external finishing of buildings.

The component parts of the nominated series are protected by individual legal instruments at the national or local levels. Four of the component parts are currently classified as National Monuments. The Boa Nova Tea House and Restaurant and the Ocean Swimming Pool were registered as National Monuments in 2011 (Decree-Law no. 16/2011), with a single general protection zone (buffer zone) established in 2012. The ensemble of the Faculty of Architecture of the University of Porto was registered as a National Monument in 2022 (Decree-Law no. 94-G/2022), though the current state of the legal protection of the component part is unclear with regard to which elements are considered to be attributes of the component part and which are not, and the buffer zone. The entire ensemble of Serralves Park was registered as a National Monument in 2012 (Decree-Law no. 31-G/2012). The situation here is similar to the issue with the Faculty of Architecture component part: a decision is needed on whether or not newly constructed parts of the museum and some of the elements and features of the park constitute attributes of the nominated property.

The ensemble of the Santa Maria Church and Parish Centre was registered as a Monument of Public Interest, the second level of legal protection, in 2013, with a general protection zone (buffer zone) established as well. The process of registering it as a National Monument was initiated in 2023 and is expected to be completed in the second trimester of 2025, according to additional information provided by the State Party in November 2024. The Portuguese Pavilion in Lisbon together with a general protection zone was registered as a Monument of Public Interest in 2010. The procedure for classifying it as a National Monument has been started, and is expected to be finalised in 2025. During this reclassification, all legal provisions regarding the protection of National Monuments currently apply to these two component parts. The Pavilion and the Church and Parish Centre sites are entered in the Architectural Heritage Inventory System of the State Party.

The Bouça Housing Complex is also entered in the Architectural Heritage Inventory System. The procedure of registering it as a National Monument started in 2023 and is expected to be completed in 2025, according to the additional information provided by the State Party in November 2024.

Registration of the Alves Costa House has also been initiated. The General Directorate of Cultural Heritage has

approved a public consultation period for the Alves Costa House to receive National Monument status (Announcement no. 214/2024 of 23 August 2024). According to the additional information provided by the State Party, the process is expected to be finished in the second trimester of 2025. All legal provisions regarding the protection of National Monuments currently apply.

Management system

Responsibility for the management of each component part of the nominated series rests with the relevant national government agencies, local authorities, and owners and administrators of the individual component parts. The State Party has developed an overall management system for the nominated series in the form of a draft Joint Management Plan, complemented and supported by a management plan for each of the eight component parts. The joint and individual draft management plans are not yet in operation.

The proposed management system is intended to promote a common vision of, and approach to, the protection, conservation, and presentation of the architectural legacy of Siza, and to enable essential communication between all levels of authorities and stakeholders. Individual management plans are similarly structured. They are organised under overarching strategies such as management integration and shared knowledge, and under operational strategies such as spatial planning, community engagement, and maintenance and appropriate use. Among the planned outputs are risk management plans, interpretation and communication plans, maintenance plans, and user manuals.

The draft Joint Management Plan includes the statute of a new organisation, the Álvaro Siza World Heritage Association, which will be responsible for the overall management of the nominated series. The Faculty of Architecture of the University of Porto will play a key role in the anticipated overall management system in which all stakeholders of the component parts will be represented. This private, non-profit association is not yet in place.

The individual draft management plans include a general statement that Heritage Impact Assessments or "standalone" impact assessments are proposed. A requirement for such assessments is not explicitly included in the plans, but a Heritage Impact Assessment was prepared to evaluate the impact the new Douro River metro bridge may have on the Faculty of Architecture campus of the University of Porto. This assessment has been annexed to the draft management plan for the Faculty of Architecture of the University of Porto component part.

Visitor management

Both Porto and Lisbon are very popular and well-serviced tourist destinations. The other component part locations also have a good tourist infrastructure, but on a smaller scale. The Municipal Councils where the component parts are located maintain visitors' sites with local information that includes the promotion of cultural events. There are

several guided tours offered by various organisations to visit works by Siza.

ICOMOS notes that many publications and other interpretative materials about the architecture of Álvaro Siza are available. The majority of them are aimed at architects, scholars, students and, to a lesser extent, visitors interested in architecture or culture. On-site interpretative materials and signage for the nominated series as a whole are currently insufficient.

The State Party indicates that it plans to develop tourism promotion strategies containing information on the World Heritage nomination both *in situ* and on a dedicated website. Achieving increased visits and accessibility are among the operational strategies and goals foreseen in the draft Joint Management Plan and individual management plans.

Community involvement

Stakeholders and local communities were consulted extensively in a participatory process preceding the submission of the nomination. The meetings and exchanges have resulted in a positive and collaborative attitude concerning the responsibilities for effective management of the nominated series.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the protection of the nominated series will be adequate when all the component parts are registered as National Monuments. The management of the nominated property is not operational as the Álvaro Siza World Heritage Association, which will be responsible for the overall management should be put in place, and the proposed series of joint and individual management plans should be made operational and the accompanying risk management plans, interpretation and communication plans, maintenance plans, and user manuals should be completed and implemented. Visitor management and community involvement are likewise adequate, though on-site interpretative materials and signage should be improved.

6 Conclusion

Álvaro Siza's Architecture: A Modern Contextualism Legacy is comprised of eight buildings and building ensembles in Portugal designed by architect Álvaro Siza during the second half of the 20th century. They were created at a time when the foundational principles of the Modern Movement in architecture were moving toward a contextual approach that integrated local references with global models.

ICOMOS acknowledges the efforts of the State Party to elaborate the nomination dossier and its investment of resources in conservation and protection.

ICOMOS considers that, at this stage, the comparative analysis does not justify consideration of the nominated

property for the World Heritage List, none of the criteria have been justified, and that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have not been met.

Precisely how the nominated property as a whole, or its component parts individually, contributed to the discourse on the nature of Modernism, or reflect in a concrete and tangible way the interchange regarding modern architecture, or reacted to the underlying principles of the Modern Movement, has not been demonstrated at this stage.

The relatively recent completion of some component parts, along with significant interventions or additions to them, does not allow for the historical distance or perspective that would be preferred for a balanced and well-informed assessment of the potential Outstanding Universal Value of the nominated property as presented in the nomination dossier

ICOMOS therefore considers that the Outstanding Universal Value has not been demonstrated, although there could be some potential if the specific shortcomings described above can be reworked or resolved. Significant additional work is needed.

ICOMOS suggests that reframing the serial nomination could potentially reveal a small number of internationally early influential examples that convincingly reflect the evolution of Modern Movement principles in architecture towards a more contextual approach – one that integrated local references with global models. The Boa Nova Tea House and Restaurant and the Ocean Swimming Pool are two such possibilities. Each of these early works by Siza compellingly combine both global and contextual aspects, and may also hold socio-cultural significance in relation to the development of Matosinhos as a place for leisure and modern culture.

ICOMOS considers that a mission to the property will be necessary once the nomination has undergone these significant revisions. ICOMOS remains available to assist, if invited by the State Party to do so.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the examination of the nomination of Álvaro Siza's Architecture: A Modern Contextualism Legacy, Portugal, to the World Heritage List be **deferred** in order to allow the State Party, with the advice of ICOMOS and the World Heritage Centre, if requested, to:

 Reconceptualise the nomination to comprise a reduced selection of internationally early influential examples of the works of Álvaro Siza that testify convincingly to the evolution of the Modern Movement towards a contextual approach that integrates local references with global models,

- Ensure that the selected component parts are registered as National Monuments,
- Complete and make operational the Joint Management Plan and the individual management plans for the selected component parts, as well as the accompanying risk management plans, interpretation and communication plans, maintenance plans, and user manuals,
- Create and make operational the association that will be responsible for the overall management of the reconfigured nominated property,
- Reconsider the boundaries of the selected component parts to ensure that they fully incorporate entire buildings, and include a sufficiently wide immediate setting to meet the conditions of integrity,
- Reconsider the buffer zones for the selected component parts to ensure that they provide an adequate layer of additional protection to the nominated property;

Any revised nomination should be visited by a mission onsite.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Rationalising the management of the extensive documentation that is currently spread across numerous locations and institutions in order to better support management, conservation, and monitoring initiatives,
- b) Informing the World Heritage Centre of the intention to undertake or authorise all major projects which may affect the potential Outstanding Universal Value of the nominated property, in line with paragraph 172 of Operational Guidelines for the Implementation of the World Heritage Convention,
- Developing and implementing a Heritage Impact Assessment for development proposals before any irreversible decisions are made.



Map showing the location of the nominated component parts

Rock Paintings of Shulgan-Tash Cave (Russian Federation) No 1743

1 Basic information

Official name as proposed by the State Party Rock Paintings of Shulgan-Tash Cave

Location

Rural settlement Kiekbaevsky Village Council Municipal Burzyansky district Republic of Bashkortostan

Brief description

Located in the western foothills of the Southern Ural Mountains within the Burzyansky district of the Republic of Bashkortostan, below a karst massif bounded by the Belaya River and the Shulgan River canyon, the Shulgan-Tash Cave (also known as Kapova Cave) contains extensive Late Palaeolithic rock paintings. The cave features large halls, galleries, steep passages, and interconnected siphons. Paintings are found in the deepest cave chambers: the Dome Hall, the Hall of Signs, and the Hall of Chaos on the first level, and the Hall of Paintings, Temple Hall, Upper Hall, Diamond Hall, and Rainbow Hall, on the second level. The rock paintings primarily depict the characteristic fauna of the steppe ecosystem mammoths, woolly rhinoceroses, bison, horses, and one complete image of a Bactrian camel - as well as anthropomorphic representations, abstract signs and geometric patterns, including the renowned "Kapova trapezoids". Archaeological finds and speleothems contribute to providing an insight into the artistic process and the domestic activities carried out in the cave in the Late Palaeolithic.

Category of property

In terms of categories of cultural property, as set out in Article I of the 1972 World Heritage Convention, this is a site

Included in the Tentative List

14 March 2018 as "Rock Painting of Shulgan-Tash Cave"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 14 to 21 July 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the documentation, the comparative analysis, the rationale for the delineation of the boundaries of the nominated property and the buffer zone, protection and management requirements, protection mechanisms of the wider setting, visitor management, development plans, and management plans.

Additional information was received from the State Party on 8 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested on research and archaeological excavation results, the impact of tourism on conservation, boundaries and the buffer zone, the protection and management framework, and the involvement of local communities.

Further clarification was received from the State Party on 18 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The Shulgan-Tash Cave (also known as Kapova Cave), located in the western foothills of the Southern Ural Mountains within the Burzyansky district of the Republic of Bashkortostan, contains extensive Late Palaeolithic rock paintings. The cave measures over three kilometres long and features a complex, two-storey karst formation. The entrance is situated on the eastern side of the Cave Massif at an elevation of 280 metres above sea level. The massif spans 640 metres in latitude and 550 metres in longitude, bounded by the Belaya River to the east and the Shulgan River canyon to the south and west.

The Shulgan-Tash Cave lies within the Bashkirian meganticlinorium of the Palaeozoic era. The cave was formed predominantly in Lower Carboniferous bioclastic limestone, transitioning to Devonian limestone in certain sections. The karst features include sinkholes, ponors, and a robust underground hydrological system, such as the Underground Shulgan River, which forms the Blue Lake — a vauclusian spring near the entrance of the cave. The cave is situated in a mixed forest environment.

The total mapped length of the cave is 3,123 metres, including 800 metres of underwater cavities explored to a depth of 84 metres. The constant humidity and temperature of the interior environment of the cave have helped preserve the paintings over millennia. The cave experiences bi-directional air exchange in its primary galleries, with stagnant conditions in remote halls such as the Hall of Chaos.

The cave comprises large halls, galleries, steep passages, and interconnected siphons. Its two storeys are separated by elevation; the first storey lies 280-295 metres above sea level, while the second ranges from 320 to 335 metres. All the paintings are located in the aphotic zones of the cave, where no natural light penetrates.

Key spaces include the Portal (Entrance Grotto), a grand hall featuring the Blue Lake and the source of the final 250-meter stretch of the Shulgan River watercourse. The Portal is 37 metres wide and 15 metres high, leading to the Main Gallery, which measures 150 metres with a width of 19-20 metres and a height of 5-8 metres, and transitions to the Stalagmite Hall. The Stalagmite Hall represents a bifurcation point leading to the Dome Hall, Hall of Signs, and Hall of Chaos, all featuring Palaeolithic wall paintings, and the Stepped Gallery, providing access to the second floor via the Near Well. The second-storey Halls include the Hall of Paintings, Temple Hall, Upper Hall, Diamond Hall, and Rainbow Hall. These spaces house notable archaeological finds and speleothems.

The rock paintings predominantly depict fauna characteristic of the steppe ecosystem, including mammoths, woolly rhinoceroses, bison, horses, and one image of a Bactrian camel. These images reflect the environment and biodiversity of the region during the Late Pleistocene. In addition to these animal figures, anthropomorphic representations, abstract signs, and geometric patterns adorn the walls.

Among the most renowned compositions are "Horses and Signs", a complete image of a Bactrian camel and zoo-anthropomorphic figures in the Hall of Chaos, and the "Kapova signs", which are unique trapezoidal motifs found in this cave and which have been named after the Kapova Cave appellation.

Most paintings were created with red ochre; some are rendered in black charcoal. The selection of these materials indicates an understanding of the natural environment and resource utilisation: ochre requires knowledge of extraction and processing, and charcoal reflects an understanding of controlled fire and material properties.

Stone tools were likely used to grind pigments, and brushes or fingers might have been employed to apply them to the walls. The choice of locations with natural contours suggests an appreciation for three-dimensionality, as artists used the irregularities of the rock surface to enhance their compositions.

The nominated property has an area of 288.5 ha, and a buffer zone of 4,038.9 ha.

The discovery of the Shulgan-Tash Cave is traditionally attributed to local residents. It was first described in the 18th century, and was further inspected and measured in the late 19th century. Systematic exploration began in the mid-20th century when scientists identified Palaeolithic paintings on its walls. The rock art paintings were discovered in 1959, and, since then, systematic research has been carried out. The first campaigns were implemented by the Institute of Archaeology of the USSR Academy of Sciences between 1960 and 1974, and research continued between 1982 and 1991. Archaeological investigations resumed in 2004 and, since 2008, small-scale annual excavations have been carried out at the cave.

Archaeological efforts have included stratigraphic excavations and radiometric analyses. In the late 20th century, interdisciplinary teams used advanced techniques, such as radiocarbon and uranium-thorium dating methods, to date calcite deposits and refine the chronology of the artefacts and geological formations of the cave. More recently, modern technologies like 3D laser scanning and geochemical analysis have enhanced the documentation of the cultural and natural features of the cave

The deposits of the cave include rockslide debris, poorly sorted silts, clayey silts, and fluvial sediments. The active hydrological regime of the Underground Shulgan River contributes to dynamic sediment redistribution. Archaeological excavations have revealed beads, pendants, painted stone fragments, ochre pencils, stone implements, and flints. The presence of pigments such as ochre suggests that the site is linked to the broader cultural networks of Late Palaeolithic societies.

Through radiocarbon dating, cultural layers within the cave containing painted rock fragments and ochre were dated to 20,600-16,500 calibrated years BP. Carbonate deposits over the paintings corroborated their Late Palaeolithic origin. Stalagmites and cryogenic carbonates in the Rainbow Hall date back approximately 40,000 years to the Pleistocene era.

The structure and stratification of cultural deposits suggest that humans visited the cave frequently but for brief periods. Frequentation continued in the Bronze Age and historic times.

The nominated cave and other natural and archaeological features in the wider setting are sacred to the Bashkir People. They believe that air, water, clay, stalactites, and *mondmilch* (moonmilk) found in the cave have health-giving properties.

In the additional information of February 2025, the State Party explained that the most extensive archaeological excavations were carried out at the Hall of Signs (1982-1991) and in the Dome Hall (2008-2024), whilst protective

excavations were performed at other locations. The results have allowed researchers to identify different usage zones inside and outside the cave. The main gathering places for artistic activity are assumed to be the Dome Hall and the Hall of Signs. Finds provide an insight into domestic and symbolic activities carried out at the cave and suggest the high mobility of these groups across considerable distances.

State of conservation

The nomination dossier reports that conservation actions began only a few years after the scientific discovery of the rock paintings in the 1960s and continued until the early 1980s. They were then resumed in 2001. Conservation measures consisted of removal of garbage, cleaning, removal of graffiti, clearing of painted images, and removing calcite deposits covering the paintings, and stains. Silicone strips were also applied to the upper part of the panel with the Bactrian camel to divert the karst water flowing onto it.

The most important conservation actions have consisted of installing panels in two zones (Throat Passage and Upper Gate), which reduce the exchange of air (warm and humid) between the interior and exterior rooms and ultimately minimise some of the deterioration processes by reducing water condensation. A barrier has also been installed in the innermost zone to reduce the increase and fluctuation of CO2. Both installations are removable and are only implemented in the summer season.

Other control measures (reduction of infiltrated water, control of biodeterioration, etc.) are under consideration, but further studies are needed, and tested suggested methods have not been considered safe in terms of negative side effects.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is good overall.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are hydrogeochemical, micro-hydrological and geomicrobiological processes which might have negative impacts on the rock art paintings. All these factors are being carefully studied, and measures to reduce hygrothermal variations and exchanges with outdoor air have been taken. Active anthropogenic factors relate to wastewater discharge from Gadelgareevo village, whilst vandalism has previously left graffiti on the cave walls, but this is no longer a threat.

A potential negative factor might also be tourism, as an increase in visitors may cause changes in interior hygrothermal conditions, particularly if they are allowed into the inner spaces where the rock paintings are located. In this regard, ICOMOS underlines the need for strictly

forbidding access to the painted spaces of the cave to all visitors without exceptions. Only limited and strictly regulated access to the staff and scientific expeditions should be allowed, and only if access is essential for conservation or research.

ICOMOS considers that the management team should contemplate installing a purification system to treat wastewater and reduce potential pollutants in the karstic system of the cave, especially if, in the future, development occurs in Gadelgareevo because of an increased attractivity of the area associated with the potential World Heritage status of Shulgan-Tash Cave.

ICOMOS considers that the state of conservation is overall good and that factors affecting the nominated property are monitored and under control. However, if tourism increases and is not rigorously managed, it might cause serious issues. In particular, access to the cave spaces where paintings are located should be reserved to scientists only and rigorously regulated. Potential pollutants in the wastewater discharged by Gadelgareevo village into the Shulgan River via the Kharala Creek might negatively impact the karstic system; therefore, ICOMOS recommends that solutions to address this issue should be implemented, for instance, by installing a wastewater treatment system.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- Shulgan-Tash Cave preserves the most extensive collection of rock art paintings from the Upper Palaeolithic Age in Eurasia, outside Western Europe. It exhibits a rich repertoire of zoomorphic, anthropomorphic and non-figurative motifs, among which stand out the composition of "Horses and Signs", the image of a Bactrian camel, and "Kapova trapezoids" which have no equivalents among the rock art motifs of Western Europe.
- Shulgan-Tash Cave also preserves several cultural layers in the sediments that shed light on the techniques used for the paintings and, more broadly, on the cultural context that underpinned the creation of these images. A significant proportion of the sediments are yet to be excavated, thus providing ample potential for further discoveries. The cave also contains palaeo-ecological and palaeo-climatic data that help improve our understanding of the environmental contexts of the users of the cave in the Palaeolithic period.
- Shulgan-Tash Cave rock art was executed in extremely inhospitable conditions for human habitation, making the endeavour even more remarkable compared to other regions where Upper Palaeolithic rock art paintings were produced.

Based on the nomination dossier and the additional information, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the geomorphology of the cave, its karstic environment and processes, its internal climatic conditions, which helped preserve the paintings, the rockart paintings with their distribution, composition, artistic techniques and pigments, and the archaeological layers with their finds. The well-preserved immediate and wider settings significantly contribute to the understanding and appreciation of the significance of the cave and how Upper Palaeolithic humans lived.

Comparative analysis

The comparative analysis has been developed on the grounds that the rock art paintings in the Shulgan-Tash cave were created in an environment which is climatically and environmentally more similar to that of Western Europe, even if much colder, than an Asian environment, and that the cultural traditions that created the paintings in the nominated property belong to a European context, rather than an Asian one. Therefore, the comparison has focused on properties within the European region inscribed on the World Heritage List, included in the Tentative Lists of States Parties, and other properties. The comparison with the Ignatievskaya Cave - the closest comparator, located some 200 kilometres from the nominated property – concluded that stylistic differences between the images suggest distinct traditions, with Shulgan-Tash rock art appearing more consistent.

The nomination dossier concludes that the Shulgan-Tash cave paintings share similarities with those in Western Europe based on iconography and stylistic observations. However, distinctive geometric signs, stylistic differences in depicting the Pleistocene fauna, and one image of a Bactrian camel suggest a specific local tradition. Therefore, Shulgan-Tash offers unparalleled pictorial undertakings and archaeological evidence of Upper Palaeolithic traditions in the easternmost area of Europe, the Southern Urals, developed in an extreme and hostile environment.

ICOMOS observed that a global comparative analysis is preferable for this type of property and asked that it be expanded further to cover comparable sites from the Asian continent. In its November 2024 additional information, the State Party expanded the comparative analysis slightly by discussing one cave rock art site in the United Kingdom (Church Hole Cave), two in Indonesia (East Kalimantan Cave (Borneo Island), Maros-Pangkep (Sulawesi Island)), and two in Australia (Kimberley rockshelters and Nawarla Gabarnmang). The site in the United Kingdom is slightly later than Shulgan-Tash, whereas the two rock art sites in Indonesia are much older. In Australia, the Kimberley rock-shelters are slightly later, whilst the site of Nawarla Gabarnmang has a much longer chronology. Finally, all of these sites exhibit a very different environmental context in comparison to the nominated property. The additional comparative analysis concludes that all Asian cave rock art sites have been created in very different palaeo-geographical, palaeozoological and archaeological contexts and, therefore, are not comparable with the Shulgan-Tash Cave rock art.

ICOMOS notes that several caves with rock art paintings have been recently discovered in the Pamir region (Istikskaya, Shakhty, Kurteke, Nayzatash, in Tajikistan, among others) and in the Qinghai Tibet Plateau, and could have been considered for comparison with the nominated property. ICOMOS also observes that the comparison with the rock paintings of Khoit Tsenkher Cave (Mongolia) could have been further developed, as scholarship considers them close to the Franco-Cantabrian tradition and different from other examples of rock art in the region.

ICOMOS also notes that the style and features of the paintings at the nominated cave may well belong to the European art system but incorporate some non-European characteristics. Hence, comparison with rock art sites from Asian contexts, such as those indicated above, would have possibly strengthened the case for the nominated property. Nevertheless, ICOMOS considers that despite some weaknesses of the comparative analysis, the nominated property deserves consideration for the World Heritage List.

ICOMOS considers that, despite some limitations, the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criterion (iii).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the Shulgan-Tash Cave, with its 192 paintings of intricate compositions depicting zoomorphic, anthropomorphic, non-figurative and geometric imagery, including a Bactrian camel and the so-called "Kapova trapezoids", contains the widest variety of Palaeolithic paintings in Eurasia outside Western Europe. Several cultural layers have been revealed through archaeological excavations, which yielded abundant finds, such as remains of hearths, stone tools, ochre pencils, jewellery and beads, contemporaneous with the art making.

ICOMOS considers that statements about the assemblage of Upper Palaeolithic paintings as the most diverse assortment found outside Western Europe are prone to disconfirmation as new discoveries are made. Therefore, it cannot be the core argument for justifying potential Outstanding Universal Value or any criterion. However, ICOMOS also considers that the rock art images, together with the cultural accumulation layers inside the cave, jointly record the lifestyle of the people at the time in an exceptional manner. The peculiarities of the cave paintings also suggest that a centre of ancient culture existed in the Southern Urals during the Palaeolithic period.

The rock paintings inside the cave showcase the commonalities and specificities of human perceptions of the world and external phenomena during the Late Pleistocene. They provide comparative insight into domestic and cultural practices from Western Europe to the Urals.

The preservation of stone tools and decorations unearthed from sediments in caves, especially the tools, pigments, and lighting fixtures required for rock painting production, provides good archaeological background evidence for the production of rock paintings.

In addition, palaeontological remains such as spores and pollen, charcoal, and dripstones reflect the time, climate, and environmental background of human occupation of the caves in the Palaeolithic era. The above series of remnants provide rare evidence of the life of the late Palaeolithic inhabitants in the South Ural region.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the proposed attributes can be confirmed

ICOMOS considers that the nominated property meets criterion (iii).

Integrity and authenticity

Integrity

ICOMOS considers that the integrity of the cave and, consequently, of the rock paintings depends on preserving the karst system. The complex geological, geochemical and microclimatic dynamics as presented in the nomination dossier appear stable. When it comes to the paintings, ICOMOS considers that, overall, their state is good, providing excellent conditions for visualisation and study despite vandalism that occurred in the past, which left graffiti now effectively removed.

The immediate and wider setting of the nominated cave is well preserved and protected: it contributes to the understanding of the significance of the nominated property.

There are potential inadvertent impacts on the underground waters due to human activities in Gadelgareevo, which is not included in the buffer zone or in the Land of Ural-Batyr cultural heritage site, as the Kharala Creek flows through the village and into the Shulgan River.

Despite this concern, ICOMOS considers that the integrity of the nominated property has been demonstrated.

Authenticity

ICOMOS considers that all investigations and studies carried out, including the dating with radiocarbon and uranium-thorium methods, confirm without doubt the

authenticity and the qualities claimed in the justification for inscription through criterion (iii).

The cave paintings themselves, the dating results based on radiocarbon and uranium-thorium methods, the stratified sediments in the cave, and the finds yielded by the archaeological excavations are sources of information confirming their authenticity. These include materials related to artistic activity, stone tools, jewellery, and bone fragments.

ICOMOS, however, notes that the replicas of Palaeolithic paintings at the cave entrance can be confusing, thus undermining the trust in the authenticity of the whole complex and should be either removed or clearly presented as a replica for touristic purposes.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met.

Boundaries

Nobody permanently lives within the nominated property or its buffer zone; however, in the vicinity of the nominated property, Gadelgareevo village has some 500 residents, and on the whole, Kiekbaevsky Village Council (part of municipal Burzyansky district) has around 1,000 inhabitants.

The boundaries of the nominated property have been designed to cover the entire underground river basin of the Shulgan River. The rationale is described in the management plan and in the November 2024 additional information.

In September 2024, ICOMOS requested additional clarification on the rationale for delineating the boundaries of the nominated property and the buffer zone. In November 2024, the State Party replied that both banks of the Belaya River have been excluded from the buffer zone because they are not part of the Shulgan River basin. The State Party further explained that potential negative impacts from activities in Gadelgareevo are negligible given the rural economic basis of the villagers and the regulations in place to control economic activities within the village territory.

Furthermore, economic activities are strictly regulated in the Land of Ural-Batyr cultural heritage site, which is included in the Unified Register of Cultural Heritage Sites (Historical and Cultural Monuments) of the Peoples of the Russian Federation (Order n. 35762-r dated 15 March 2016) as a site of regional significance as per Order of the Ministry of Culture of the Republic of Bashkortostan dated 2 December 2015 No. 380.

In February 2025, the State Party explained that, in the Russian Federation, the protection regime for a buffer zone of a World Heritage property could be achieved through the

designation of a cultural heritage site or a natural protected area, which both impose considerable restrictions. The State Party explained that the village is not included in the buffer zone, as the local population strongly opposed it, nor in the Land of Ural-Batyr cultural heritage site. The Kharala Creek falls under the provisions of the Water Code of the Russian Federation (N 74-FZ dated 3 June 2006, amended on 8 August 2024), establishing a 50-metre protection zone along the banks of rivers in which several activities are restricted. Solid waste management is also regulated, and no dumping is allowed outside specialised landfills.

ICOMOS understands the reasons for not including Gadelgareevo within the buffer zone at this stage. However, the relevant authorities are encouraged to develop less rigid protection mechanisms for the buffer zone of the nominated property through planning instruments instead of heritage designations, and to continue the dialogue with the local community for the inclusion of the village territory within the buffer zone in the future.

The Operational Guidelines for the Implementation of the World Heritage Convention require that regulatory mechanisms be in place to prevent activities that might adversely impact the attributes of the Outstanding Universal Value, be they carried out in the buffer zone or in the broader setting of a property. Therefore, protective mechanisms via planning documents will have to be established for the areas outside the buffer zone or the Land of the Ural-Batvr cultural heritage site.

ICOMOS considers the boundaries of the nominated property and of the buffer zone understandable and acceptable.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that, despite some limitations in the comparative analysis, partly overcome by the additional information, the nominated property justifies consideration for the World Heritage List under criterion (iii). The rock art images, together with the cultural accumulation layers inside the cave provide rare and exceptional evidence of the life of the Late Palaeolithic inhabitants in the South Ural region. Peculiarities recognised in the cave paintings suggest that a centre of ancient culture existed in the Southern Urals during the Palaeolithic period. The conditions of integrity and authenticity of the nominated property are fulfilled. However, concerns remain about excluding Gadelgareevo village from the buffer zone. Measures for preventing potential negative impacts on the nominated property and its intact setting from possible future development or water pollution must be established and integrated into the legal and planning framework covering the nominated property, its buffer zone and wider setting. The State Party is encouraged to continue dialogue with the local communities with a view to finding adequate protective arrangements and including the village in the buffer zone in the future. The replica of rock art paintings at the entrance of the cave is recommended to be

removed or clearly presented as a replica to avoid confusion with the authentic rock paintings.

4 Conservation measures and monitoring

Documentation

Extensive studies and investigations have been undertaken at the nominated property over the past sixty years. A documentary record has been developed based on conventional and most recent techniques, such as LiDAR or laser scanning. A description and classification of the different painted motifs, their spatial relationships, the composition of pigments, and the pictorial techniques used have also been elaborated. Archaeological excavations have been carried out at various locations in the cave.

A GIS cartography showing the complete geometry and the immediate reliefs of the cave has also been prepared, collecting all data gathered through investigations and monitoring.

In the additional information of February 2025, the State Party provided a concise summary of the archaeological research carried out in the nominated property, along with additional details that complement the nomination dossier. ICOMOS considers that an analytical evaluation of the already excavated areas, the collected and documented archaeological material, and the remaining intact archaeological remains would assist in planning future research. Future methods might help in extracting more knowledge from sources that would enlighten the rock art production and meaning.

Conservation measures

Several conservation interventions have been carried out over the decades to remediate anthropogenic damage, i.e., graffiti and garbage disposal, and natural phenomena, such as calcite deposits crystallised on the painted images. More recently, removable panels have been installed in two zones to reduce the exchange of air and the modification of thermo-hygrometric parameters in some inner rooms to minimise deterioration processes. A barrier has also been installed in the innermost part of the cave to reduce the increase and fluctuations in CO2.

Regarding the interior hygrothermal parameters, the State Party indicated in February 2025 that, since the movable polymer screens were installed, condensation phenomena have lowered significantly. When the accessibility infrastructure was installed, an automatic microclimatic monitoring system did not yet exist, but according to a comparison with data collected before and after installation, micro-environmental parameters have not changed.

In its interim report, ICOMOS enquired whether the State Party would consider creating a replica of the painted halls to facilitate the understanding and appreciation of the rock art by visitors, even without providing access to it. The State Party replied that the considerable size and internal

articulation of the Shulgan Tash Cave do not make a replica feasible. Furthermore, replicas of the painted panels have been made and are installed in the Shulgan-Tash Historical and Cultural Museum-Reserve. Therefore, there is no need for a full-scale reproduction of the entire cave.

ICOMOS considers the reply understandable and acceptable as long as no visitors are allowed into the painted sections of the cave.

The State Party has also informed that, after the construction of the Shulgan-Tash Cave Historical and Cultural Museum-Reserve, 255 objects were transferred to the collection of the museum, in a continuing effort to document the archaeological material found in the cave.

Monitoring

ICOMOS takes note of the additional information concerning the measurement of interior climatic parameters following the installation of the air barriers. However, it observes that these relatively recent interventions in a cave with paintings that have survived for several millennia may lead to modifications to interior parameters of the cave, with long-term effects that are difficult to predict. Careful and close monitoring of the variations in interior parameters at different locations in the halls and their potential adverse effects on the paintings appears indispensable for the long-term preservation of the Palaeolithic paintings. Modelling of micro-climatic internal air circulation and potential conditions. condensation phenomena might provide additional insights into the environment of the interior cave halls and assist in predicting potential undesired impacts on the rock paintings.

The conservation actions implemented were based on data from routine measurements over many years. Since 2011, microclimatic measurements have been carried out continuously with new, measured parameters and equipment. A complex installation of sensors whose measurements are entered into a database monthly is currently in place. This is complemented by periodic sampling and routine inspections.

ICOMOS recommends planning regular maintenance measures, recording the outcomes of routine inspections on record sheets with graphic documentation, and integrating a conservation-restoration technician into the research team. It is also essential to define alarm levels for environmental parameters and carrying capacity for the external and internal zones of the cave, establish more detailed monitoring of geo-structural as well as microbiological factors, and introduce climate change factors in the risk quantification matrix.

ICOMOS considers that documentation of the nominated property is adequate and is important to support conservation and monitoring. Regular maintenance measures should be strengthened via a maintenance plan, based on the outcomes of enhanced routine inspections. An evaluation of the evidence and

information yielded by the archaeological research and excavations, regarding areas yet to be excavated and with the potential to provide additional information on the Palaeolithic users of the cave, would be an essential basis for planning future research.

A research programme for the conservation of the cave and the paintings with a long-term workplan is necessary to meet the challenges of the nominated property. In this regard, integrating a conservator-restorer into the research team is advisable. The variations in interior parameters and possible adverse effects on the paintings should be continuously monitored, particularly if the experimental increased number of visitors is planned to be maintained. Monitoring data should be cross-referenced with periodic assessments of the state of conservation of the paintings in the nominated property. More detailed monitoring of geo-structural and microbiological parameters and integrating climate change factors into the risk quantification matrix are recommended.

ICOMOS finally considers that it would be advisable that the monitoring system is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The main relevant laws that provide the protective framework for the nominated property include the Federal Law No. 73, dated 25 June 2002.

The nominated property is comprised within the Cultural Heritage Site of Federal Significance (hereinafter CHS FS) named "Kapova Cave with Palaeolithic Paintings", which has been under federal protection since 1960 (Decree of the Council of Ministers of the RSFSR dated 30 August 1960 No. 1327). The CHS FS was registered in the Unified State Register of Cultural Heritage Sites (Historical and Cultural Monuments) of the Peoples of the Russian Federation. The change of name of the protected site is the outcome of additional research and has been approved by the government; the nomination dossier also informs that the new name "Rock paintings of Shulgan-Tash cave (Kapova cave)" will be integrated into the Unified State Register of Cultural Heritage Sites (Historical and Cultural Monuments) of the Peoples of the Russian Federation, and its category will be upgraded to "most valuable".

The nominated property and its buffer zone are included in the Land of Ural-Batyr cultural heritage site (also named "attraction site" in the nomination dossier) as designated by Order No. 380 of the Ministry of Culture, Republic of Bashkortostan, dated 2 December 2015. Furthermore, Order No. 193, dated 15 July 2016, regulates economic activities and provides zoning regulations for the Land of Ural-Batyr. Three recreational zones have been established within its limits, but all are outside the buffer zone of the nominated property.

The nominated property, its buffer zone, and its wider setting enjoy an additional layer of protection as they are included in the territory of the Shulgan-Tash State Nature Biosphere Reserve, and the Bashkirya National Park which are protected at the federal level, as well as the Altyn-Solok State Wildlife Reserve, which is protected at the state level. Both the Biosphere Reserve and the Wildlife Reserve are part of UNESCO Bashkir Urals Biosphere Reserve.

Several institutions are responsible for protecting and managing the nominated property; they are described in detail in the nomination dossier. Only the most relevant institutions will be mentioned here. The Ministry of Culture of the Russian Federation has a control and supervisory role; the Likhachev Institute for Cultural and Natural Heritage has an advisory and consultation role; the Department of State Protection of Cultural Heritage Sites of the Republic of Bashkortostan ensures state protection and performs supervision, control and monitoring; the newly established Shulgan-Tash Cave Historical and Cultural Museum-Reserve is the primary property management entity, while the federal state budgetary institution (FSBI) "Shulgan-Tash State Nature Biosphere Reserve" holds management responsibilities for the Nature Reserve which covers part of the buffer zone of the nominated property. The Ministry of Natural Resources and Environment of the Russian Federation and the Ministry for Natural Resources and the Environment of the Republic of Bashkortostan are also involved.

The nomination dossier also lists several stakeholder and partner institutions at the federal and state levels.

ICOMOS requested further information on the boundaries of the federally-protected CHS FS and an update on the status of this procedure in September 2024. In November 2024, the State Party replied that the boundaries of the nominated property fully align with those of the CHS FS; the process of updating the Unified State Register is pending and awaits the conducting of an historical and cultural appraisal by a certified expert of documentation appointed for the update. The regulations for the certification of cultural experts changed in September 2024; therefore, no expert was certified according to the amended rules to undertake such a task. Hence, the Unified State Register update has been postponed to 2025.

In its interim report, ICOMOS requested updated information on the status of this procedure. The State Party replied that the situation has not changed since November 2024, but the certification is expected to start in March 2025.

The regulatory framework for the Land of Ural-Batyr cultural heritage site envisages three recreational areas designated to enhance tourism infrastructure. Economic activities compatible with the preservation of the nominated property are permitted, including maintenance, repair, and limited construction development; outside the recreational areas, only activities aimed at conservation are allowed.

Management system

The management system is based on federal and state legislative and institutional frameworks that have already been well-established for several years.

The State Budgetary Institution Shulgan-Tash Cave Historical and Cultural Museum-Reserve is the main management entity of the nominated property and of the buffer zone. It was established through the Order of the Government of the Republic of Bashkortostan No. 1075-r and No. 540-r dated 22 August 2016.

The management of the buffer zone and the wider setting sees the involvement of different regulation regimes and entities: the Shulgan-Tash State Nature Biosphere Reserve, the Directorate for Specially Protected Natural Areas of the Republic of Bashkortostan and the Bashkirya National Park, a federal entity created in 1986 to manage the homonymous national park.

The management plan acknowledges the existence of some issues related to the governance of the nominated property, which falls under two distinct management entities. In its interim report, ICOMOS recommended the implementation of a unified and coordinated governance. The State Party explained that establishing a single decision-making body is not possible and proposes to merge the existing advisory councils established respectively in 2014 (International Expert Council under the Government of the Republic of Bashkortostan) and in 2021 (Coordination Council at the Museum-Reserve Shulgan-Tash Cave) into a two-level Expert Coordination Council. This proposal is reflected in the management plan.

ICOMOS observes that the creation of one collegial decision-making body would be an adequate way forward to overcome fragmentation in governance. Such a body could, for instance, take the form of a Steering Committee (or Council) that includes all relevant actors (not only the Shulgan-Tash State Nature Biosphere Reserve and the Shulgan-Tash Cave Historical and Cultural Museum-Reserve but also the other relevant actors). The management plan indicates that multiple operating agreements exist among different actors for different purposes. ICOMOS advises to establish one overarching Cooperation Framework Agreement among all relevant actors for governance and management of the nominated property, its buffer zone and wider setting. Such a cooperation framework shall set out respective roles, functions and responsibilities, cooperation modalities and decision-making mechanisms related to the nominated property management. The Steering Committee (or Council) should be supported by a Working Group, with representatives from the operational entities in charge of the management, that cooperate and coordinate the implementation of the management plan while recognising the primary managing role of the Museum-Reserve. An Advisory Council including representatives of scientific and academic institutions supporting decision-making can strengthen the overall governance and management of the nominated property, its immediate and wider setting.

Spatial planning documents elaborated according to the Planning Code of the Russian Federation (Federal Law No. 140 dated 29 December 2004), consider the special regimes of the federally- and state-protected cultural heritage sites. Relevant plans are reported in the nomination dossier. Also relevant for the nominated property is the Republic of Bashkortostan Socio-Economic Development Strategy for 2019-2030, which sets out objectives for preserving and promoting access to cultural heritage sites, including a programme promoting the development of tourism infrastructure. Local inhabitants of the Burzyansky district are involved in developing tourism infrastructure and services. The Murat-Tugai area is currently undergoing the development of tourism infrastructure, with the recently completed construction of a museum complex and the planning of a residential complex. It is recommended that a Heritage Impact Assessment be carried out to evaluate any potential negative impact deriving from the tourism complex development on the proposed Outstanding Universal Value of the nominated property.

ICOMOS considers that the provisions of the territorial planning documents for Gadelgareevo need to ensure that any potential future building development in the village territory is regulated to avoid negative impacts on the nominated property and its setting, which has been so far preserved and contributes significantly to the understanding of the proposed Outstanding Universal Value and cultural significance of the nominated property. Guidance on how to conduct rehabilitation and maintenance intervention would also be advisable to support villagers in their efforts to create a liveable and pleasant environment in the settlement.

A comprehensive management plan has been developed for the Shulgan-Tash Cave, focusing on four main strategic objectives, articulated around the conservation of the nominated property, its effective management, sustainable development and improved stakeholder engagement.

Management strategies include improving legal frameworks for protection and management, developing partnerships between public and private sectors, and increasing public awareness campaigns to promote the cultural and environmental value of the site. The management plan aims to achieve measurable outcomes by 2030, such as establishing a unified managing organisation, improving local infrastructure, and enhancing stakeholder engagement. Funding is sourced from government programs, public-private partnerships, and international collaborations.

ICOMOS considers that the management plan should integrate a risk preparedness management plan. An appraisal of the implementation level of the actions planned in the first period of validity of the management plan and the consequent update of the action plan is advisable.

Visitor management

The discovery of the Shulgan-Tash rock art paintings resulted in an almost immediate flow of tourists coming to

visit the cave. Efforts to improve accessibility and to regulate and limit tourism were implemented; negative impacts from tourism have been partially addressed. The approach to accessibility has fluctuated between restriction for safety and conservation reasons, and valorisation over the last decades. This has led to changes in the infrastructure inside the cave. The tourist route concerns only the outer rooms of the cave, whilst, for the inner rooms, where the paintings are located, regulations ensure that only researchers and staff of the Museum-Reserve can access them. Tourists visit the cave on guided tours.

Plans exist to upgrade the touristic offer in Murat-Tugai, immediately outside the buffer zone along the Belaya River, to improve the visitor experience by 2030. The recently completed Shulgan-Tash Museum-Reserve, located in Murat-Tugai along the Belaya River, offers significant didactic information on the cave and high-quality 3D replicas of the paintings' imagery.

ICOMOS notes that regulations setting a cap of 600 visitors per day were established in 2018 (Order No. 263, Department for State Protection of Cultural Heritage Sites, Republic of Bashkortostan). However, in 2019, this number was increased to 1,500 on summer weekends on an experimental basis.

In the additional information of February 2025, the State Party indicated that an increased number of visitors in the excursion area – which does not include the cave sections with rock paintings – has not yielded a statistically significant correlation with variations of internal hygrothermal parameters in the painted halls. Therefore, according to the State Party, an increase of visitors up to 1,400 per day has no impact on the internal climate of the halls with paintings. The initial limit of 600 persons per day was established based on the infrastructure capacity; the increase in visitor numbers has been made possible through extended staff working hours and reduced intervals between visitor groups.

ICOMOS considers that a definitive ceiling to daily visitor numbers should be set out, based on rigorous scientific monitoring of the impacts on the internal climate of the cave, the carrying capacity of the infrastructure, safe working and visit conditions, and be fully respected. Given that the number of visitors is likely to increase if the nominated property is eventually inscribed on the World Heritage List, a robust visitor management strategy needs to be developed as soon as possible to ensure that tourism does not jeopardise the long-term preservation of the cave paintings.

In the meantime, ICOMOS considers that the museum visit, currently optional in the tourist offer, should become part of the cave tour so that people can be introduced to the cultural significance of the cave and be offered information before the actual visit.

Furthermore, the configuration, design, and structures of potential future works and facilities for tourist access

should be carefully assessed in terms of their impact on the delicate balance of the internal environment of the cave. The same applies for the potential negative impacts of archaeological activities in the inner parts of the cave, which should also be strictly regulated.

The risk of over-tourism at Murat-Tugai, outside the buffer zone but adjacent to the nominated property, should not be underestimated. It should be counteracted through a tourism strategy that encompasses the wider setting and the potential it offers for locating tourism facilities further away from the nominated property.

Community involvement

The nomination dossier refers to various methods of communication with the local population, who all belong to a homogeneous group of Indigenous Sunni Muslim Bashkirs who identify themselves as a major tribal subdivision known as "Kypsak". They were invited and present at several workshops and symposia. However, there is no specific information about engagement with the group.

The local community has been informed about the nomination from inception and is aware of the scientific studies undertaken at the cave. In addition, the nomination is connected to local opportunities for small-scale economic and tourism development and the long-term sustainability of the nominated property.

In the additional information of February 2025, the State Party informed that the local population had been involved in the nomination process since its beginning. The boundaries of the buffer zone were agreed upon with the local population and supported by the local village council deputies. The exclusion of Gadelgareevo village from the buffer zone is the outcome of local community involvement. Bilateral cooperation agreements were signed with the Nature Reserve, the village council and the Burzyan district. Both the Biosphere and the Museum Reserves employ local residents. Several awarenessraising and dissemination activities are implemented for the local population and visitors, and local residents, in turn, are involved in organising festivals and traditional events. The management plan includes, among its strategic objectives, strengthening the collaboration with all stakeholders and local communities and building consensus around management directions and activities.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that overall the legal framework for protecting the nominated property is adequate for the nominated property, its buffer zone and its wider setting. However, since Gadelgareevo village is not included in the buffer zone or the Land of Ural-Batyr cultural heritage site, the planning documents in force for Gadelgareevo territory need to include measures regulating any potential future building development in the village to avoid negative impacts on the nominated property and its setting.

The current governance framework relies on two management entities that report at the federal and state levels; the State Party has been working towards establishing a unified governance framework through an established collegial decision-making body and an operational entity. It is recommended that the proposed governance be strengthened by involving, at the relevant level, all relevant actors responsible for managing the nominated property, its buffer zone and wider setting, including the local authorities. Mandates, roles and responsibilities should be set out in one framework cooperation agreement instead of the multiple bilateral ones currently in place to strengthen coordination and consistency. Such a collegial decision-making body, supported by an implementation body and an advisory entity, shall guarantee the coherence of action in protecting, preserving, interpreting, and promoting the heritage values of the nominated property.

The management plan should integrate a risk preparedness management plan. The action plan may benefit from being updated based on an appraisal of its level of implementation.

ICOMOS considers that development activities allowed within the Land of Ural-Batyr and the wider setting of the nominated property should undergo a systematic Heritage Impact Assessment to ascertain that they do not negatively impact the attributes of the nominated property supporting the proposed Outstanding Universal Value or undermine the natural and remote character of the setting in which the nominated property is situated, as the latter represents an important element for the appreciation of the significance of the Shulgan-Tash Cave.

6 Conclusion

The Rock Paintings of Shulgan-Tash Cave represent an extensive collection from the Upper Palaeolithic Age. These paintings primarily depict the characteristic steppe fauna ecosystem and are considered the most representative in Eurasia outside Western Europe. The cave contains a rich repertoire of zoomorphic, anthropomorphic, as well as non-figurative motifs, and the cultural layers in the sediments shed light on the techniques used for the paintings, and the cultural context underpinning the creation of these images.

The comparative analysis, complemented by additional information and assessment by ICOMOS, demonstrated that the nominated property justifies consideration for the World Heritage List under criterion (iii), particularly in relation to the challenging freezing climatic conditions in which the artistic endeavour was undertaken and the figurative specificities of the paintings. The rock art images and the accumulation of cultural layers, archaeological finds and speleothems inside the cave provide rare and exceptional evidence of the artistic processes and domestic activities of the Late Palaeolithic inhabitants in the South Ural region. Specificities of the

paintings suggest that a centre of ancient culture existed in the Southern Urals during the Palaeolithic period, making it distinct from the Franco-Cantabrian tradition.

The conditions of integrity and authenticity of the nominated property are fulfilled. The state of conservation is overall sound, and factors affecting the nominated property are monitored and controlled. The nominated property is well documented, and the body of knowledge being produced represents a robust basis for conservation, monitoring, interpretation and for planning future research necessary for addressing conservation challenges. Continuous monitoring of internal parameters is key to measuring any potential variations in hygrothermal dynamics; it deserves to be complemented with more detailed geo-structural and microbiological monitoring to inform conservation and risk management planning.

The Shulgan-Tash Cave is located in an almost intact rural environment, only sparsely inhabited. This setting significantly contributes to the appreciation and understanding of the proposed Outstanding Universal Value of the nominated property, and its remote and intact character needs to be preserved.

Potential pressures from increased tourism will require rigorous management to avoid any negative impacts on the delicate balance of the cave environment and the paintings.

The overall legal framework is adequate and could be reinforced through regulatory measures for development, integrated into the planning documents for areas in the immediate setting outside the buffer zone.

The State Party plans to establish a collegial decision-making body and an operational entity involving the two major management entities of the nominated property, its buffer zone and the wider setting. Involving all relevant management actors, including local authorities, within the proposed governance framework will reinforce cooperation and management effectiveness.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Rock Paintings of Shulgan-Tash Cave, Russian Federation, be inscribed on the World Heritage List on the basis of **criterion (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Rock Paintings of Shulgan-Tash Cave, also known as Kapova Cave, are located in the western foothills of the Southern Ural Mountains within the Burzyansky district of the Republic of Bashkortostan, below a karst massif bounded by the Belaya River and the Shulgan River canyon. The property features large halls, galleries, steep passages, and interconnected siphons and contains

extensive Upper Palaeolithic rock paintings in the aphotic zone of the cave.

The rock paintings are found in several chambers at different levels and primarily depict the characteristic fauna of the steppe ecosystem – mammoths, woolly rhinoceroses, bison, horses, and one complete image of a Bactrian camel – as well as anthropomorphic representations, abstract signs, and geometric patterns, including the renowned "Kapova trapezoids". These rock paintings were created during the Last Glaciation Maximum and at the beginning of the deglaciation, between 20,600 and 16,500 calibrated years BP. The climate in the Southern Urals was severe and the temperature in the cave was constantly below 0°C, making it extremely difficult to produce paintings there in comparison with other caves known to display Palaeolithic art.

The rock paintings bear witness in an outstanding way to commonalities in human perceptions of the world and of external phenomena from Western Europe to the Urals during the Late Pleistocene. The peculiarities of these paintings also suggest that a centre of ancient culture existed in the Southern Urals during the Palaeolithic period. They provide insight into shared and different domestic and cultural practices covering vast areas of Europe. In addition, archaeological finds and speleothems provide rare and outstanding evidence of the artistic process, and of the domestic activities carried out by humans in the Shulgan-Tash Cave in the Late Palaeolithic.The property offers a vast potential for future investigations and the advancement of knowledge on production tools for rock art, imagery and paintings in the cave

The forested immediate and wider setting is mainly intact, with no impact from urbanisation, and contributes to the understanding of the Outstanding Universal Value of the property.

Criterion (iii): The Rock Paintings of Shulgan-Tash Cave provide outstanding evidence of the cultural and domestic practices of the Southern Urals Upper Palaeolithic inhabitants. The numerous paintings on the cave walls and the rich archaeological materials found in the cultural layers of the cave sediment offer important comparative and differential perspectives on domestic and cultural practices across vast areas of Europe, highlighting both common and distinctive elements in the use of cave and production of rock art.

Paleontological finds, spores and pollen, charcoal, and dripstones reflect the temporal, climatic and environmental contexts of the Palaeolithic human occupation of the cave. Wall paintings and other evidence of non-utilitarian activities provide additional cultural and anthropological context.

The property offers significant potential for further research and knowledge production.

Integrity

The integrity of the property depends on the preservation of the karst system and the stability of its parameters. The geological, geochemical and microclimatic factors of the deep section of the cave appear stable, ensuring the long-term preservation of the wall paintings and loose sediments containing archaeological materials. Although some painting panels suffered contamination and defacement by graffiti during the initial exploration of the cave, the State Party rapidly protected the property. The attributes are therefore adequately conserved and convey the Outstanding Universal Value of the property; they are not in danger of natural decay or neglect.

Factors affecting the property mainly relate to housing and agricultural activities in the buffer zone. These risks are considered low and are closely monitored. However, impacts on the inner part of the cave due to increased visitor numbers in its outer part need constant monitoring, and prompt corrective measures if necessary.

The almost intact character of the remote rural environment of the property needs to be preserved.

Authenticity

The authenticity of the property relies on the numerous paintings on the cave walls depicting Late Pleistocene fauna (mammoth, rhinoceros, bison, horse, camel), as well as the archaeological materials found in the sediments. The paintings were dated using uraniumthorium dating, and are over 14,500 years old. Radiocarbon dating of charcoal has made it possible to determine the age of the cultural layer, which is estimated to be between 20,600 and 16,500 calibrated years BP. This comprehensive collection of data and objects, unequivocally ascribing the Shulgan-Tash paintings to the Upper Palaeolithic era, is genuine in its materials and substance. Palaeontological relics such as spores and pollen, charcoal, and dripstones reflect the time, climate, and environmental background of human occupation of caves in the Palaeolithic era.

Protection and management requirements

The property has been protected as a federal cultural heritage site since 1960. The protection and management of cultural heritage is governed by the Federal Law No. 73, dated 25 June 2002. The property, the buffer zone and the broader setting enjoy additional layers of protection through the designation of this territory as the Shulgan-Tash State Nature Biosphere Reserve and the Altyn-Solok State Wildlife Reserve, both part of the UNESCO Bashkir Urals Biosphere Reserve, and the Bashkirya National Park. The property and its buffer zone are included in the cultural heritage site Land of Ural-Batyr. This territory is covered by a special town-planning regulation that limits economic activities to preserve natural, historical, and cultural monuments.

The Ministry of Culture of the Russian Federation, the Department for State Protection of Cultural Heritage Sites of the Republic of Bashkortostan, the Ministry of Natural Resources and Environment of the Russian Federation

and the Ministry for Natural Resources and the Environment of the Republic of Bashkortostan ensure the protection, financing, control, planning and management of the property and its buffer zone. The Shulgan-Tash Cave Historical and Cultural Museum-Reserve, is the key management entity for the property and surrounding area, and the Shulgan-Tash State Nature Biosphere Reserve exercises responsibility over the Biosphere and part of the buffer zone

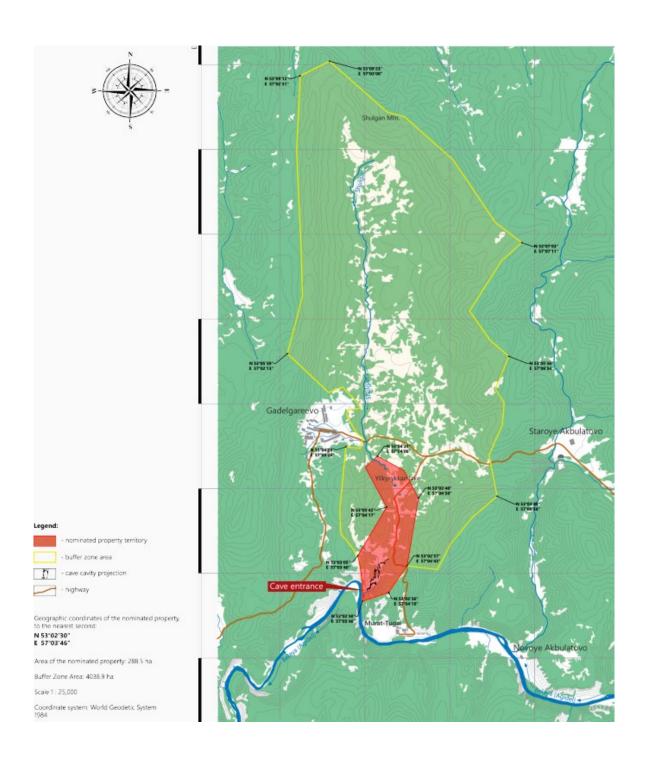
The cave holds significant sacral importance for the Indigenous Bashkir people. Careful surveillance by the local community provides further protection to the property. Coordination and cooperation among all responsible entities, including local authorities, via a collegial governance and management framework, is essential for effectively protecting, planning and managing the property, its buffer zone and its wider setting.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Strengthening the current governance by involving, at the appropriate levels, all relevant actors responsible for managing the property, its buffer zone and wider setting, including the local authorities.
- Updating the multiple bilateral agreements under one management agreement involving all relevant actors responsible for the property,
- Ensuring that the planning documents in force for Gadelgareevo include measures regulating any potential future building development in the village territory to avoid negative impacts on the property and its setting,
- d) Designing and implementing a research programme for the conservation of the rock paintings with a long-term workplan, and integrating a conservator-restorer into the research team,
- e) Strengthening the management plan by integrating a risk preparedness management plan,
- f) Strengthening the monitoring system by detailing the geo-structural and microbiological factors and cross-referencing the internal climatic data with periodic assessment of the state of conservation of the paintings,
- g) Strictly limiting access to cave spaces containing paintings to scientists, and only if access is necessary for research or conservation purposes,
- h) Considering removing the replica of rock art paintings at the entrance of the cave or carefully presenting it as a replica to avoid confusion with the authentic rock paintings,

- Including the museum visit into the route of the cave tour to introduce visitors to the cultural significance of the rock paintings and their creation before the visit to the outer section of the cave,
- j) Considering building a wastewater collector and treatment plant for the Gadelgareevo village, especially if the number of residents increases due to the attractivity of the World Heritage designation,
- k) Envisaging more flexible protective mechanisms for the buffer zone and continuing the dialogue with local communities with a view to extending the buffer zone to cover the Gadelgareevo village territory and possibly the entirety of the Land of Ural-Batyr cultural heritage site,
- Integrating into the management and decisionmaking system Heritage Impact Assessment processes for all developments planned in the buffer zone or the wider setting, as this setting is key in contributing to the understanding and appreciation of the Outstanding Universal Value of the property.



Map showing the boundaries of the nominated property

Sardis and the Lydian Tumuli of Bin Tepe (Türkiye) No 1731

1 Basic information

Official name as proposed by the State Party Sardis and the Lydian Tumuli of Bin Tepe

Location

Districts of Salihli, Ahmetli, Saruhanlı and Gölmarmara Province of Manisa Türkiye

Brief description

Sardis served as the capital of the Lydians who rose to prominence in the 8th-6th centuries BCE, becoming the first Iron Age empire in the region. Strategically located between the Greek world and the Eastern Mediterranean, Sardis was known for its wealth. The Lydian city consisted of three distinctive areas: the acropolis, the walled urban core, and the unwalled extra-mural area with settlements. sanctuaries, and cemeteries. Lydian Sardis featured a distinctive urban plan that included a terracing system and massive fortification walls. The cemetery of Bin Tepe features some of the largest tumulus tombs in the world, with some distinctive structural features. The Lydians developed a unique language and religious beliefs and are known for their invention of coinage. Their civilisation is prominently featured in Greek, Roman and later European literature. Following the fall of the Lydians, the development of Sardis continued in successive Persian, Greek, Roman and Byzantine phases.

Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of two *sites*.

Included in the Tentative List

15 April 2013 as "The Ancient City of Sardis and the Lydian Tumuli of Bin Tepe"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 2 to 9 September 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about the boundaries and buffer zones, conservation, planned and approved development projects, updated information about the actions in the management plan, and community associations and involvement.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the proposed Outstanding Universal Value and associated attributes, the extent of the Lydian city, the interpretation, buffer zones, quarrying/mining, conservation plans, annual permissions for the Sardis Expedition, and the UNESCO Global Geopark.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

This is a nominated serial property of two component parts located in western Türkiye. The first is the citadel of Sardis (1,656 hectares), surrounded by sheer cliffs created by massive fortifications; and the second is the Lydian Tumuli of Bin Tepe (7,588 hectares). The State Party has itemised 174 archaeological features/elements within these two component parts.

Sardis was occupied for more than four millennia. It was the capital of the Lydians and retained this name through subsequent historical periods. The Lydians rose to prominence in the region in the 8th-6th centuries BCE, conquering most of western Anatolia. Sardis has a distinctive urban layout based on a system of monumental terraces and imposing fortifications, and an extensive funerary landscape with a large number of tumuli and rock cut tombs.

Component part 1: Sardis

The State Party described three distinctive areas of Lydian Sardis: the Acropolis, the walled urban core, and the unwalled extra-mural area with settlements, sanctuaries,

and cemeteries. The first two are well defined. The extent of the extramural settlement at Sardis is less well defined. It is uncertain whether the known sites represent isolated neighbourhoods, or reflect the fragmentary nature of our understanding of an essentially continuous habitation zone. The State Party considers that the latter is more probable.

The site of Sardis includes the citadel surrounded by a series of terraces, sheer cliffs and a massive fortification rising to heights of over 10 metres in places, with a span of 3.5 kilometres and a thickness of 10 to 20 metres. It is the largest ancient fortification in Anatolia and among the largest in the Mediterranean world. The lower city features mudbrick Lydian houses, rock-cut tombs on both sides of the Pactolus River, and the Lydian gold refining house. Most Lydian tumuli were built with doors and *klinai* or *dromoi* features, allowing future generations to add burials, and many were used over centuries. The burial chambers were built from carved limestone or marble, an ostentatious use of materials and workmanship.

Lydian remains in the city core are deeply buried beneath later Hellenistic, Roman, and Byzantine remains, although the available evidence suggests that the entire area was relatively densely occupied during the Lydian period.

Component part 2: Lydian Tumuli of Bin Tepe

The tumulus cemetery of Bin Tepe is located 7-17 kilometres north of Sardis and has 119 tumuli spread over an area of 75 square kilometres. The construction of the tumuli began in the 7th century BCE. The cemetery includes several tumuli that are amongst the largest in the world, such as the Tumulus of Alyattes (c. 590-580 BCE) which is 63 metres high. The tumuli feature distinctive crepis walls and marker stones.

The Lydians continued earlier Phrygian burial traditions from Gordion, where similar monuments had been built for centuries.

Based on the additional information provided by the State Party in February 2025, the area of the two component parts totals 9,244 ha, with buffer zones totalling 6,835 ha.

The Lydians occupied a strategic position connecting the Greek world and Near Eastern cultures. Their rapid expansion was facilitated by immense wealth, based on gold. The Lydians are known for the invention and adoption of coinage, with widespread and long-lasting influences. During his rule, King Croesus (580-547 BCE) eventually controlled a large area of Anatolia including the sites of Gordion, Daskyleion, and Apamea/Kelainai.

There are many stories about the wealth of the Lydians, including the dedications made by Croesus at the Temple of Artemis at Ephesus and at Delphi. The Greeks characterised the Lydians as barbaric, elitist and luxury-loving.

The importance of Sardis outlived the fall of the Lydians. There were successive Persian, Greek, Roman and Byzantine phases with further development of the fortifications and urban plan. As a result, parts of the city were continuously occupied for over 1,000 years. Many of the most impressive structures evident on the site today were built in the later periods, including: the Temple of Artemis (the fourth largest lonic temple in the world); a monumental three-bay Roman arch; Roman baths and gymnasium; the largest and most richly decorated synagogue from antiquity; and the Byzantine fortifications of the acropolis. Sardis is therefore of broad historical interest.

After Lydia was conquered by the Persians in the mid-6th century BCE, the tumuli at Bin Tepe continued to dominate the landscape. Persian elites adapted these monuments as burial sites. This process continued until approximately the 4th century BCE. As a result, the tumuli remained dynamic landscape features that reflected and supported the changing political and cultural conditions in the region.

State of conservation

The identified Lydian features in Sardis are below-ground archaeological sites, walls, structures, tombs and sarcophagi occurring in rural contexts but also in peri-urban environments (near the villages of Başlıoğlu and Şirinyer).

Significant areas of standing structures of different historical periods have been exposed for public display in the vicinity of the entrance to the ancient city (e.g. Lydian fortifications, houses and gate; Lydian gold refinery, monumental arch, synagogue, Roman road, bathgymnasium complex, Sanctuary of Artemis). These structures are generally in good to excellent condition, but can be susceptible to deterioration without continuous monitoring and conservation.

The quality of the consolidation and conservation of some exposed structures and remains reflects past standards and, in some cases, may be regarded differently today due to their impacts on authenticity (such as the large-scale reconstruction of the Marble Court site). Current *in situ* conservation and consolidation is carried out following international standards based on the full documentation of the original remains.

Despite regular maintenance and vegetation clearance, some areas appear neglected and the condition and state of conservation of exposed structural remains varies. Uncontrolled vegetation is visually intrusive and can be damaging to fabric of the site. In some locations, the fabric is in poor and deteriorating condition which requires urgent remedial action.

Many of the tumuli survive as standing earthworks in varying condition. Many are in good condition, but others are eroded or otherwise badly damaged through natural decay and erosion, looting, or agricultural impacts.

In general, there are shortcomings in the current state of conservation of some of the features of the nominated

property. In particular, exposed archaeological remains have been negatively affected by processes of natural erosion and/or looting. The State Party is aware of these challenges and has recognised the need to develop a comprehensive maintenance programme across the whole nominated property that determines practical priorities for future conservation.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property is relatively high for most features, including below-ground archaeological deposits. The condition of standing structures and exposed remains varies. In some cases, the management of exposed remains requires more active and rigorous conservation in order to sustain their authenticity.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are looting, agriculture (especially olive cultivation), development pressures from both existing and new village settlements, and quarrying.

Many of the archaeological features of the nominated property have suffered from ongoing looting and illegal excavation. In the most severe cases, bulldozers have been used to search for valuable artefacts in individual tumuli. While information provided to the ICOMOS mission by the State Party indicates that the number of incidents recorded annually is falling, ICOMOS notes that the data collection has not been very rigorous, and that continuing looting represents a significant challenge to the integrity of the nominated property.

Based on the observations of the ICOMOS mission and additional information provided in November 2024, it is evident that the severity of the problem of looting and illegal excavations is recognised and that steps are being taken to address this threat. Measures include the development of a staffed surveillance centre deploying drones with day/night vision cameras to identify illegal activities and enable a rapid response by law enforcement. These initiatives are outlined in the Site Management Plan and will require resourcing for the collection of robust data, effective enforcement and inter-agency coordination. Additionally, the State Party is also focusing on national programmes to prevent illicit trafficking by strengthening the bonds between local communities and the archaeological sites. To support these objectives, the national Prevention of Illicit Trafficking Unit has been promoted to a full department, including a training and education unit.

A large proportion of both component parts and their buffer zones are under some form of agricultural cultivation mainly for olives and vineyards. These areas are included in the 1st and 3rd degree archaeological conservation areas and farming activities are subject to a wide range of controls and restrictions (eg. livestock numbers, ploughing, use of fertilisers). Ploughing and

planting is relatively shallow, and olive and vine cultivation does not generally cause deep damage. However, fencing on private land is the subject of legal contestation, and there are instances where farmers have removed fences established to protect attributes on private property.

It is estimated that at least twenty-one per cent of the turnuli at Bin Tepe are suffering significant erosion due to farming or looting. The State Party has recognised the need for urgent action, and has formulated a strategy to overcome the illegal planting of olive trees, as well as a renewed fencing and signage programme, better and more effective monitoring and reporting, awareness raising among the farming community, and other related actions. The Site Management Plan mentions possible regulations to restrict agricultural activities on archaeological sites. However, all these measures are tempered by the necessity to ensure continuing cultivation of privately-owned land and to minimise negative economic consequences on local farmers.

Upland areas in the Sardis component part are owned and managed by the Manisa Governorship Provincial Directorate of Agriculture and Forestry. These areas are vulnerable to threats such as tree uprooting, felling, and the impacts of forest management including vehicle access tracks, and there are instances of illegal logging. Additionally, pine trees have been planted on the slopes of the acropolis in order to slow or stop the rate of erosion, but it is not clear whether this has been effective. Regular institutional liaison with forestry authorities is a beneficial element of the management system.

There are some settlements within the nominated property component parts and buffer zones. These comprise relatively low-density buildings and domestic houses linked to small holdings and other open areas. For Sardis, the area north of Sartmahmut, north of Sartmustafa, and north and southeast of Çaltılı neighbourhood have been proposed as urban development areas. For Bin Tepe, the villages of Dibekdere and Tekelioğlu fall within the component part, and the southern and eastern margins of Dibekdere have encroached on several tumuli, and other villages are located within the buffer zone. The State Party has confirmed that all proposed developments in these settlements will remain subject to the protection afforded by the relevant cultural heritage designations, and that Urban Design Guidelines will be developed.

Past transportation infrastructure projects have impacted on the nominated component parts. The State Party has no plans to further develop major transport infrastructure that could impact on the nominated property and its setting.

Located within the buffer zone, a large open mine/quarry complex at Kale Tepe to the west of Sartmustafa has been operating continuously since 2001, extracting sand and gravel, and to a small, extent gold. This operation represents a negative intrusion in the landscape that is

visible from great distances and has negative impacts on the setting of Sardis. As well as the extensive extraction scar, impacts also include the large plant and processing area, and large areas of mine waste. In the additional information received in November 2024, the State Party indicated that no archaeological finds have been reported in this area, and that the mine occurs outside the 1st degree archaeological conservation area.

The twenty-five-year licence for quarrying activities will expire in December 2026. In the additional information provided in February 2025, the State Party did not confirm that the quarry would definitely be closed at that time, although there are plans to restore elements of the landscape following the completion of the licence. The Site Management Plan states that a Heritage Impact Assessment report will be requested to evaluate the impact on the proposed Outstanding Universal Value of the area before any new application is made or considered, and that these assessments will be forwarded to the World Heritage Centre and ICOMOS. Nevertheless, ICOMOS considers that a firm commitment is required to prohibit all new mining and quarrying licences within the nominated property and its buffer zones.

The State Party notes the potential for earthquakes, landslides and floods in this area. A fault line runs beneath Sardis, and several severe earthquakes occurred in Antiquity. There are some present-day risks of landslides associated with the fault line. The tumuli on the banks of the Gediz River are vulnerable to flooding, although effective flood mitigation infrastructure has been constructed. Overall, ICOMOS considers that the risk assessment and mitigation are adequate.

ICOMOS considers that the state of conservation is generally good, but that it varies across the two large component parts, and that factors affecting the nominated property are agricultural cultivation and looting, and their uncontrolled impacts. Past transport infrastructure developments and the ongoing operation of the quarry near Sardis have had negative impacts on the nominated property.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- Sardis was one of the pre-eminent cities of the ancient world during the Iron Age and served as the sole capital of the Lydians.
- The Lydians were important in the histories of the ancient world because they established the first Iron Age empire in the region and invented coinage, which had widespread and lasting influence.
- Situated at a crossroads between the Greek world and Near Eastern cultures, Sardis developed close

- economic, military and diplomatic ties with many of these civilisations.
- The Lydian capital of Sardis had a unique system of monumental terraces, creating an urban plan unlike the Greeks, Egyptians or Near Eastern cultures of this period.
- The fortifications of Sardis are unique in the cultures of Anatolia and the Eastern Mediterranean. The large tumuli at Bin Tepe are among the largest tumulus tombs in the world and are the first to incorporate certain technical features.
- The Lydians and Kings Croesus and Gyges are important figures in Greek and Roman literature.

Based on the nomination dossier and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the archaeological materials, fortifications, landscape modifications, tumuli and other structures associated with the Lydian period (such as the Acropolis, lower city area, extra-mural settlement area, rock-cut tombs and tumuli). The landscape setting is also an attribute.

ICOMOS notes that the justification for the proposed Outstanding Universal Value focuses on the Lydian capital, its distinctive characteristics and geocultural significance, it is also the case that many of the most impressive elements within the nominated property are associated with other historical and cultural periods.

Comparative analysis

The comparative analysis presented by the State Party is relatively brief and was developed on the basis that Sardis and its associated necropolis at Bin Tepe was the capital and only known city of the Lydians – an ancient culture with its own language, writing system, religion and architectural traditions. Sardis shares certain traits with other ancient cities in Anatolia, the Mediterranean and Near Eastern region, including the Phrygian capital at Gordion (Türkiye, 2023, criterion (iii)) and Ephesus (Türkiye, 2015, criteria (iii), (iv) and (vi)). The Anatolian site of Daskyleion is also a relevant comparator.

The State Party has provided information about the similarities and differences between the nominated property and these others based on their key built features and urban plans. It is acknowledged that the remains of the early Phrygian city are more numerous and monumental at Gordion, whereas the density of Hellenistic and Roman buildings covering Lydian Sardis has destroyed many earlier remains and prevented wide archaeological exposure of what survives. By the late 7th century, the Lydians controlled Gordion and there were a number of shared characteristics. While not on the same scale as the terrace complex of Gordion, the State Party highlights the use of limestone ashlar masonry at the gate and monumental terraces at Sardis as reflecting a broader interchange of architectural technologies in the later Iron Age.

Comparisons presented by the State Party reveal similarities between the Lydian fortifications at Sardis and

other contemporary sites in this geocultural area, including the World Heritage properties of: Hattusha: the Hittite Capital (Türkiye, 1986, criteria (i), (ii), (iii) and (iv)); the Archaeological Site of Troy (Türkiye, 1998, criteria (ii), (iii) and (vi)); the Archaeological Sites of Mycenae and Tiryns (Greece, 1999, criteria (ii), (iii), (iii), (iv), (vi)); Masada (Israel, 2001, criteria (iii), (iv) and (vi)); Ashur (Qal'at Sherqat) (Iraq, 2003, criteria (iii) and (iv)); Nimrud (Tentative List, Iraq); The Ancient City of Nineveh (Tentative List, Iraq); and Babylon (Iraq, 2019, criteria (iii) and (vi)). There are various similarities, such as the use of fired brick.

Later examples of Lydian masonry, terracing and urbanism are found at other sites, such as Pasargadae (Iran, 2004, criteria (i), (ii), (iii) and (iv)); Susa (Iran, 2015, criteria (i), (iii) and (iv)); Persepolis (Iran, 1979, criteria (i), (iii) and (vi)); and many later sites in Anatolia. These sites represent the movement and transfers of masons and other trades following the fall of Sardis.

The State Party also acknowledges that tumulus tombs are, in general, not unusual. In Anatolia, these are found through the Iron Age and Hellenistic and Roman periods (for example, Pergamon and its Multi-Layered Cultural Landscape (Türkiye, 2014, criteria (i), (ii), (iii), (iv) and (vi)); Commagene (Nemrut Dağ, Türkiye, 1987, criteria (i), (iii) and (iv)); Ephesus; and Hierapolis-Pamukkale (Türkiye, 1988, criteria (iii), (iv) and (vii)) in Phrygia).

Gordion features an extensive monumental tumulus cemetery similar to Bin Tepe. The Phrygian mounds at Gordion are earlier than those at Bin Tepe, and the State Party considers that it is likely that the Lydians drew this technology from Gordion. There are also differences between the two in terms of the construction of the burial chambers and single versus family tombs. There has been more extensive looting at Bin Tepe, due in part to the valuable grave contents. Bin Tepe shares similarities with other examples, but the tombs are earlier, more numerous than most, with some exceptionally large examples such as the Tumulus of Alyattes (described by Herodotus), Karniyarik Tepe and Kır Mutaf Tepe which likely influenced later examples.

ICOMOS notes that the use of monumental terraces, platforms and tumulus tombs is not unusual within this period or geocultural area, nor is the construction of raised temples and/or substantial cultic complexes. While the State Party acknowledges many examples throughout the world, many are of limited comparative value. ICOMOS also considers that comparing ancient settlements according to their individual architectural elements in isolation is unlikely to reveal the specificities that enable the property to be considered for inscription in the World Heritage List.

ICOMOS considers that the relevant geocultural context for this nomination should be oriented at Anatolia, the Near East and Mediterranean regions within the Iron Age period. In this respect, the comparative analysis provided by the State Party is appropriate, touching on both

similarities and differences between the Lydian capital and its tumulus cemetery and sites such as Gordion, Ephesus, Smyrna and Pergamon, and the later development of Persian cities such as Pasargadae.

ICOMOS notes that the urban morphology, the fortification technologies of Sardis, and the scale of its tumuli are significant within Iron Age Anatolia. The closest comparator is Gordion, which has been examined carefully by the State Party. The two sites share an intertwined history towards the end of the 7th century BCE, when the Lydians extended their domination over Phrygia. The topographical context and the layout of these two citadels are different, with Sardis presenting an ambitious terraced layout. ICOMOS concurs with the conclusions of the State Party that the tumuli from Bin Tepe are larger and more numerous than other comparable examples, including the singular example of the Tumulus of Alyattes.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (ii), (iii), (iv) and (vi).

Criterion (ii): exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;

This criterion is justified by the State Party on the grounds that the Lydians were central players in cultural and technological exchanges between peoples in Greece, the eastern Mediterranean, and the cultures of the Near East and Egypt. These interchanges are visible in the architecture and urban planning of Sardis.

ICOMOS notes that the Lydian capital of Sardis was located in a key position between the Mediterranean (Greek) and Eastern worlds. In the additional information received in February 2025, the State Party further elaborated on the tangible attributes that demonstrate interchanges between West and East. These include the Lydian citadel, fortifications, terracing and urban layout; as well as evidence of stylistic and technical influences in Lydian ceramics, stonework, architectural techniques, and tumulus tombs. However, ICOMOS also notes that much of Lydian Sardis has yet to be researched. ICOMOS does not consider that these examples of interchange are what makes the nominated property potentially outstanding or exceptional. The specificities outlined by the State Party in relation to this are more relevant to the justification for criterion (iii).

ICOMOS considers that this criterion is not demonstrated.

Criterion (iii): to bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that Sardis is the sole city of the Lydians, a vanished civilisation that had profound impact on the ancient world. The Lydians invented the world's first coinage and conquered much of western Anatolia founding the first Iron Age empire in the region. Their language and spiritual beliefs, as well as their architecture and urban organisation were distinctive.

ICOMOS considers that Sardis and Bin Tepe bear a unique and exceptional testimony to the Lydians, a vanished culture that had a profound impact on the history of the ancient world, in culture, religion, architecture and urban planning, including through the invention of coinage.

ICOMOS considers that this criterion is demonstrated.

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history:

This criterion is justified by the State Party on the grounds that Sardis and Bin Tepe include significant structures in the development of architecture and urbanism in Iron Age eastern Mediterranean and western Asia. The Lydian fortification represents a unique example of a Near Eastern type in a distant context; and the terracing system at Sardis was a prototype for terraced cities such as Pasargadae, Persepolis, Halicarnassus and Pergamon. Additionally, the Tumulus of Alyattes is the largest tumulus in the world. In the additional information of February 2025, the State Party provided more details about the distinctiveness of the Lydian urban plan (including its terracing and fortifications) as well as on the tumulus tombs.

ICOMOS notes that many elements within the nominated property are distinctive and comparatively significant. However, because the Lydian city is overlain by important structures and archaeological remains of later periods, there is much future archaeological research and excavation still to do to fully appreciate the Lydian urban plan and elements.

Because of this complexity and importance of future discoveries, ICOMOS considers that this criterion is not demonstrated. Many of the arguments presented in relation to this criterion are relevant to and further strengthen the justification for criterion (iii).

Criterion (vi): to be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that Sardis is associated with key historical people and events, particularly the unexpected fall of the Lydians and of King Croesus, which became a famous story and a lesson in the dangers of hubris and abundant wealth. The Lydians are also represented in ancient works of poetry in Greek and Latin literature on the basis of these historical details.

ICOMOS notes that the rise and fall of the Lydians, and the rich and powerful, but ultimately unfortunate character of Croesus has been reflected in literature from ancient times, giving added interest to the remains of the Lydian city. However, ICOMOS considers that there is insufficient justification of the universal significance of these expressions, and the tangible evidence within the nominated property to support this criterion. The wealth of the Lydians, and the destruction of the city by the Persians are relevant to the justification for criterion (iii).

ICOMOS considers that this criterion is not demonstrated.

ICOMOS considers that the nominated property meets criterion (iii), but that criteria (ii), (iv) and (vi) have not been demonstrated.

Integrity and authenticity

Integrity

The integrity of the nominated serial property is based on the state of conservation and the way major pressures are managed; and the intactness of the material evidence of the selected component parts. For serial nominations, integrity is also a measure of whether the component parts contain all the attributes necessary to express the proposed Outstanding Universal Value, and how each component part contributes to that value.

The integrity of this nomination is justified by the inclusion of the full extent of the site of Sardis and the Lydian tumuli at Bin Tepe, which encompass all the attributes necessary to demonstrate the Outstanding Universal Value of the Lydian period. According to the additional information of February 2025, there are unexcavated areas within the nominated property that are expected to contain important evidence of the Lydians, and all such areas are within the boundaries of the nominated component parts.

While its scale is challenging and there are some shortcomings, the two component parts are protected and overall exhibit a good or fair state of conservation. For the most part, the boundaries align with the legal protection of the archaeological conservation areas, and are supported by the buffer zones. The importance of the visual relationship between the component parts will be further protected by the agreement to create a single buffer zone for the nominated serial property.

ICOMOS considers that the integrity of the whole nominated series as well as the integrity of each of the two component parts have been demonstrated. However, the nominated property is vulnerable due to the potential for uncontrolled impacts of farming and looting.

Authenticity

Sardis and the Lydian Tumuli of Bin Tepe are well-preserved archaeological sites that demonstrate authenticity in relation to the proposed Outstanding Universal Value. There is a substantial archive of archaeological reports and data, alongside significant artefact collections derived from Sardis.

Some past actions have reduced the authenticity of the nominated property, such as some of the reconstructions at Sardis, and looting of the tumuli at Bin Tepe. The wider landscape setting connects the two component parts (and the features they contain) and underpins the authenticity in terms of their location and setting.

ICOMOS considers that the authenticity of the whole nominated series, as well as the authenticity of each of the component parts, has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met.

Boundaries

According to the State Party, there are 3,435 inhabitants in the nominated property, and 4,006 inhabitants in the buffer zones. A large amount of the land inside the component parts and buffer zones is in private ownership (forty-three per cent for the Sardis component part, and eighty-four per cent of the Bin Tepe component part). There are several rural settlements included in the component parts and buffer zones, and large areas are planted with vineyards and olives. There is an overlap between the nominated property and buffer zones with the UNESCO Global Geopark of Kula-Salihli.

In order to determine the boundaries of the component parts, the State Party conducted a field survey in 2022, and the proposed boundaries were reviewed by relevant stakeholders.

Although the boundaries align in many ways to the delineation of the 1st and 3rd degree archaeological conservation areas established by the legal framework, there are some variances. For the Sardis component part, the boundary has been extended further to the south beyond the 1st and 3rd degree archaeological conservation areas to incorporate a large landscape block that includes the upland areas of Başlıoğlu and Şirinyer, and the intervening valley to the south which contains important features, including the significant marble quarries of Mağara Deresi. To the west, the boundary of Sardis excludes the block of land at Kale Tepe that is currently subject to a mine/quarry licence.

The boundaries of Bin Tepe coincide with the 1st and 3rd degree archaeological conservation areas.

ICOMOS considers that the boundaries of both nominated component parts are clearly established and

incorporate the attributes necessary to convey the proposed Outstanding Universal Value.

Buffer zones surround each of the component parts. The State Party has advised that the delineation of the buffer zones is based on topographic characteristics and land uses, such as roads and a railway line.

The buffer zone for Bin Tepe includes a portion of the currently dry bed of Lake Marmara, which was of significance to the Lydians. Given plans to return water to the lake, the buffer zone could be extended in future to include the full extent of the lake. Through exchanges with ICOMOS during the evaluation procedure, the State Party agreed to extend the buffer zone for Bin Tepe (component part 2) to include the 1st and 3rd degree archaeological conservation areas of the Bronze Age citadel of Kaymakçı due to its links with the component part (a map showing this change was provided in the additional information of February 2025).

The State Party acknowledges that the visual relationship between the component parts is of significance. However, the buffer zones of the two component parts do not fully protect the wider setting and the visual connections between them. In the additional information of February 2025, the State Party expressed a willingness to transform the proposed buffer zones into a common one for the two component parts, providing an outline of the needed administrative processes and timelines.

ICOMOS appreciates the willingness of the State Party to create, through a minor boundary modification request, a common buffer zone for the nominated property because it will strengthen the protection of the visual connections between the two component parts and the wider setting of the nominated serial property.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies consideration of this serial property for the World Heritage List. Criterion (iii) has been demonstrated. The requirements for integrity and authenticity of the nominated serial property as a whole and of the component parts have been met, although they are vulnerable due to the impacts of agricultural land uses and looting. Quarrying and mining in the nominated property and buffer zones should be prohibited following the expiry of the current licence at Kale Tepe. The boundaries of the nominated component parts are appropriate. ICOMOS welcomes the decision by the State Party to create a single buffer zone for the nominated serial property, through a minor boundary modification request.

4 Conservation measures and monitoring

Documentation

All the proposed attributes of the nominated property have been fully inventoried and documented to a high standard and to a common format. Mapping, archaeological excavations, field surveys and non-invasive investigations at Sardis and Bin Tepe span over more than a century, resulting in a significant body of published work. However, there has been relatively little archaeological research focused on the burial mounds because of the amount of looting that has occurred.

The Sites and Monuments Inventory is maintained by the Izmir No. 2 Regional Council for the Conservation of Cultural Property and comprises the National inventory System for Registered Immovables (TUES); and an inventory of records of the archaeological sites (including individual features and objects) is maintained by the Manisa Museum using the Museum National Inventory System (MUES). This includes locational information about individual features. The programme of digitising the archive of records has the ability to improve access, provide a basis for monitoring and management, and enhance awareness of the nominated property.

Survey work is ongoing. Features have been identified through intensive field survey, geophysical survey, coring and excavation. ICOMOS notes that the geophysical survey has been oriented around individual features, and that a more extensive survey could better inform the definition and understanding of these features and the Lydian city area as a whole. This should form part of the research plan for the nominated property. In the additional information of February 2025, the State Party provided a summary of the proposed excavation programme for the coming year which includes investigation of both Lydian and Roman features.

There is a vast archive of published and unpublished material related to the different sites and elements of the nominated property. This is spread among national and international institutions, museums, and universities. The most recent records are maintained at Harvard Art Museums which is the main repository for its sixty-five years of continuous excavation at Sardis. Most of these records have now been digitised.

Artefacts from the current excavations are stored in a secure purpose-built facility in the expedition compound at Sardis and transferred on an annual basis to Manisa Museum. Together, this material forms a very comprehensive dataset.

The Sardis Expedition has established a public website in English and Turkish to disseminate information. The website includes a searchable database of over 10,600 artefacts, 11,000 images, architectural plans, videos, and information about ongoing conservation and excavation projects. The platform aims to make the research accessible to researchers and the public.

Conservation measures

The Site Management Plan recognises the need to protect the nominated property within the framework of a conservation plan that assesses and monitors the current state of conservation and determines and sets out the priorities for conservation and repair.

In the additional information received in November 2024, the State Party provided a summary of the principles that guide conservation decisions for the nominated property. All ongoing conservation work is carried out by long-term and experienced conservation professionals working to national and international standards. Where courses of masonry have been restored or capping layers have been added as a protective measure, these are distinguished from the original fabric. All work is fully recorded and documented.

There are shortcomings in the current state of conservation for some of the exposed remains. The maintenance of multiple features widely dispersed over such a large landscape is a challenge. Even within the core accessible areas of the Sardis component part, some key features appear neglected.

Considerable efforts have been devoted to the assessment of the state of conservation of individual features and groups of features. Ongoing conservation work is effective, but is also somewhat fragmented, lacking coherence and an overarching framework. An effective and well-regulated monitoring and maintenance programme is essential, alongside an emergency conservation plan to address key priorities, so that the necessary resources can be allocated to agreed conservation priorities. Current standards and methods are appropriate, and the State Party and Sardis Expedition can be commended for the inclusion of local communities in conservation programmes.

Two primary areas of Sardis are protected by new permanent lightweight roof structures which replaced earlier versions. These are made from a lightweight fabric over a steel frame with louvered side panels that are designed to provide ventilation and temperature control whilst preventing rain ingress. ICOMOS considers that while they have some visual impact, these shelters are carefully designed and provide effective protection for the remains they cover with minimal physical impact.

There are also temporary covers over excavation areas and some other smaller protective shelters and glass platforms that are less effective and visually unappealing (eg. the cover over part of the Gold Refinery). These should be reviewed as part of the development of a conservation plan.

The state of conservation of the sections of the walls of the Lydian fortifications varies due to the different materials used in their construction. The mudbrick sections can become friable and vulnerable to weathering. Methods of encapsulating the original wall with a layer of new mudbricks have been tested and will be implemented in

2025. A protective roof is in place, enabling visitors to experience the Lydian features *in situ*.

The condition of exposed remains within the ancient city of Sardis is regularly monitored by Manisa Museum, the Izmir No. 2 Regional Council for Conservation of Cultural Properties, and the Sardis Expedition (including tracking temperature and humidity).

Monitoring

The monitoring arrangements are outlined in the nomination dossier. Many of the indicators presented focus on compliance with administrative and policy frameworks. There are useful inclusions of indicators associated with community engagement and visitor experiences, and visitor pressures. This would benefit from a more targeted focus on monitoring the state of conservation of the attributes, including the identification of trends, providing the site managers with the capacity to intervene in processes of deterioration and/or damage. Environmental conditions are also being monitored, in particular where new lightweight roof structures have been installed.

ICOMOS considers that the documentation, conservation, and monitoring are adequate. The indicators used for monitoring require further development to focus on the changes over time in the state of conservation of the attributes. ICOMOS considers that it would be advisable that the monitoring system is adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

A series of legal mechanisms provide protection to the nominated component parts. Sardis is designated as a 1st and 3rd degree archaeological conservation area by Decision No. 9274 (12 January 2018) of the Izmir No. 2 Regional Council for Conservation of Cultural Properties. This ensures protection by the Law on the Conservation of Cultural and Natural Property No. 2863, (23 July 1983) as amended by Law No. 5226 (14 July 2004).

Bin Tepe was designated as a 1st and 3rd degree archaeological conservation area by Decision No. 9660, (27 April 2018) of the Izmir No. 2 Regional Council for Conservation of Cultural Properties.

Most of the Sardis component part and virtually all of the Bin Tepe component part are recognised within the highest level of the national protective framework. However, some important features in the southern part of the Sardis component part have a lesser degree of protection. ICOMOS considers that the 1st degree archaeological conservation areas should be revised in the future to align with the boundaries of the component parts.

The immediate environs of the citadel of Sardis are protected from adverse development as a 3rd degree

archaeological conservation area according to Decisions No. 3583 (9 January 2008), No. 5132 (7 October 2009), and No. 9719 (11 May 2018) of the Izmir No. 2 Regional Council for Conservation of Cultural Properties. There are also a number of specific protections provided for related sites within the wider setting. The Izmir No. 2 Regional Council for Conservation of Cultural Properties is responsible for controlling development within the boundaries and the wider setting.

The buffer zones are protected through the implementation of strategic and regional plans, particularly through the mandatory regional conservation plans. At present there is no approved 1:5000 or 1:1000 scale Conservation Development Plan, nor is there supplementary planning guidance based on the Site Management Plan, although this is in progress. Local 1:1000 scale conservation plans are an essential tool in the planning process and should be developed as part of the implementation of the Site Management Plan following a realistic defined timetable.

In the additional information received in November 2024, the State Party confirmed that Heritage Impact Assessments are undertaken for development projects and activities that are planned for implementation within or around the nominated property. ICOMOS notes, however, that there are no legal frameworks that mandate Heritage Impact Assessments and suggests that this should be addressed in future to ensure clarity and coordination with the processes of legal protection.

Overall, ICOMOS considers that the legal protection is well-established, and that the legislative and regulatory measures at national, provincial/regional and municipal levels are appropriate and generally effective in protecting the component parts from negative impacts. The development of the Izmir Regional Conservation Plan should be established in tandem with the Site Management Plan for the nominated property.

Management system

The General Directorate of Cultural Properties and Museums (through its Department of World Heritage Sites) is responsible for the management of the nominated property, acting with its local representatives, the Izmir No. 2 Regional Council for Conservation of Cultural Properties (responsible for coordination of management issues and permits) and the Manisa Museum (responsible for archaeological cultural resource management) in joint cooperation with the Sardis Expedition (Harvard University). The Ministry of Culture and Tourism is responsible for permissions for collaborations with international research organisations.

The Sardis Expedition exercises day to day responsibilities for the archaeological site at Sardis and its surrounding landscape, an arrangement that will stay in place as long as it continues to be sponsored by the Harvard Art Museums. In the additional information of February 2025, the State Party explained that this arrangement is subject to annual review in light of the

legal agreements in place. There has been a long involvement with Harvard, but if it were to be cancelled, the General Directorate of Cultural Properties and Museums is ultimately responsible for the management and possesses adequate instrumental, human, and financial resources to do so.

An Advisory Board and a Coordination and Audit Board were established to develop the Site Management Plan, comprising representatives of a wide range of national, provincial and municipal authorities, the military police, excavation teams, and residential neighbourhoods.

A Site Management Plan for the nominated property and its buffer zones was approved in January 2024. Implementation is the responsibility of the Site Manager (Director, Manisa Provincial Directorate of Culture and Tourism), supported by the Manisa Museum, Izmir No. 2 Regional Council for Conservation of Cultural Properties and the Sardis Expedition.

The Site Management Plan sets out policies and objectives and has a Strategic Action Plan for the period 2024-2028. These tools set out the measures necessary to address outstanding issues in a realistic timeframe. The structure of the Site Management Plan articulates well with national, provincial, and municipal institutional stakeholders. Responsibilities have been assigned to different elements of the implementation plan, although it is not yet clear whether sufficient resources have been allocated to undertake the identified work.

The Site Management Plan foreshadows the creation of a Conservation Development Plan for both Sardis and Bin Tepe. Urban Design Guidelines for each village, and a Landscape Plan that will determine the location of new tourism infrastructure. In the additional information received in February 2025, the State Party confirmed that preparation of plans that cover the rural settlements is on the agenda of the three relevant local authorities. The development of Urban Design Guidelines for each village, and a Landscape Plan that will determine the location of new tourism infrastructure will be incorporated within the scope of the 1:1,000 scale conservation plans. In the Site Management Plan, the State Party provided a detailed outline of the timeframes for these plans (which have a necessary sequence) within the next five years. Some of these will be finished sooner, and ICOMOS considers that advancing these as quickly as practicable will assist in operationalising the management and protection.

The Sardis Expedition have a conservation programme of regular maintenance and monitoring. The Sardis Expedition Five Year Plan sets out a programme of work of the Sardis Expedition for the period 2018-2024; and the Site Management Plan policies, objectives, and actions related to archaeology, research and documentation recognise the importance of continuing to conduct and document research on aspects of the nominated property, and the need to identify areas/topics for future research. Further indication of how these will be determined and how competing priorities might be balanced against

available resources could be developed through the establishment of a research plan. This should also include a research plan for Bin Tepe, and the wider landscape.

All factors affecting the nominated property as a whole and the individual features have been properly identified and considered in the Site Management Plan. Threats and other risks are generally low. Where they are higher (mainly from illegal cultivation and/or looting), appropriate management and mitigation is outlined in the Site Management Plan. Management of risks is well structured and is incorporated into relevant policies, objectives, and actions.

Visitor management

In 2023, more than 66,000 people visited Sardis. This is fewer than pre-COVID levels and can be expected to experience a moderate increase.

The Site Management Plan describes the infrastructure and facilities for visitors in the local area, including hotels and transportation services; and the facilities at Sardis including parking, ticketing, souvenir sales and two visitor centres (with various visitor amenities). Currently, there are no transportation services or visitor facilities available at Bin Tepe.

The Site Management Plan recognises the need to establish a more coherent approach to visitor management and interpretation, and outlines measures such as walking and cycling routes and a visitor centre/viewpoint with appropriate facilities at Bin Tepe. Signage within Sardis is in place but needs to be extended across the site. There is no interpretation at Bin Tepe.

Manisa Museum houses important collections of material from Sardis. It has recently been relocated to a new purpose-built structure that will reopen shortly with high quality interpretation.

While visitor pressure is not anticipated to be a significant threat, ICOMOS recommends that further work is undertaken within the framework of the Site Management Plan to develop a sustainable tourism plan and an interpretation plan that integrates the presentation of the two component parts as a single property that highlights the Lydians along with the other important historical periods and monuments.

Community involvement

Communities in and around the nominated property are predominantly rural and economically dependent on agriculture. There is also a long-standing engagement of community members in archaeology and conservation projects, and with the Site Manager and Sardis Expedition.

The development of the Site Management Plan included consultation with people living in and around the nominated property, as well as a questionnaire-based survey. Additional information received in November 2024 provided more detail about these consultations. These

confirmed community support for the nomination, but also indicated concerns about the ability for agriculture, irrigation and construction to continue.

The State Party recognises that awareness of the nominated property and its values is relatively low and that a longer and more thorough process of community engagement is needed. The Site Management Plan includes a number of policies, objectives, and actions including educational initiatives aimed at improving local awareness, new opportunities for the local community to derive economic benefits and increased direct community participation in conservation. Consideration should be given to including local community members in the governance for the potential World Heritage property.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection is appropriate, and a sound management system is in place, with an ambitious list of actions for implementation. Plans policies, and future actions for visitor management are in place, although the interpretation of the Lydian elements and the connections between the two component parts should be enhanced. ICOMOS considers that, due to the large amount of private land included in the nominated property and buffer zones, local community engagement is crucial for the long-term conservation and presentation of the nominated property, and that additional means of including local community representation in the management system should be considered.

6 Conclusion

Sardis and the Lydian Tumuli of Bin Tepe are nominated as a serial property comprising two component parts that represent the capital and elite cemetery of the Lydians, who rose to prominence in the 8th-6th centuries BCE, becoming the first Iron Age empire in the region. Strategically located between the Greek world and the Eastern Mediterranean, Sardis was known for its wealth. The urban plan and architecture demonstrate distinctive characteristics, including its terracing system and massive fortification walls. The cemetery of Bin Tepe features some of the largest tumulus tombs in the world, with some distinctive structural features. The wealth and demise of the Lydians is featured in Greek, Roman and later European literature; and was followed by successive Persian, Greek, Roman and Byzantine phases.

Mapping, survey and archaeological research at Sardis has occurred for more than a century, yet there is much more to learn about the Lydians and the subsequent phases of the history of the nominated property. Plans for maintenance, conservation, research and visitor management are in place, with clear actions identified.

ICOMOS considers that the Outstanding Universal Value of the nominated serial property has been demonstrated on the basis of criterion (iii). The arguments presented by

the State Party in relation to criteria (ii), (iv) and (vi) were not considered to be sufficiently justified, but support the justification for criterion (iii). The boundaries are appropriate, and ICOMOS appreciate the willingness of the State Party to provide, through a minor boundary modification request, a single buffer zone that will encompass both component parts to strengthen the protection of the important visual connection between them. The state of conservation is generally good or fair, and the nominated serial property meets the requirements for integrity and authenticity.

The legal protection and the Site Management Plan are in place, although there are some plans at the regional level of the management system that are still in preparation. The State Party acknowledges the importance of these measures, and ICOMOS encourages their progress and completion as soon as practicable. ICOMOS strongly recommends that the State Party take steps to prohibit future quarrying and mining within the component parts and buffer zones. Additional recommendations for the needed improvements to the management system, measures to counter looting and damages from agricultural land uses, and community involvement have been formulated by ICOMOS.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that Sardis and the Lydian Tumuli of Bin Tepe, Türkiye, be inscribed on the World Heritage List on the basis of **criterion (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

Sardis was one of the pre-eminent Iron Age cities of the ancient world. Located in western Türkiye, it was the capital and only city of the Lydians. The Lydians rose to prominence in the 8th-6th centuries BCE, conquering most of western Anatolia and establishing the first empire in the region during the Iron Age. They invented coinage, an innovation that was quickly adopted by their neighbours, with long and widespread impacts on global economies. Located at a crossroads between the Greek world and contemporary Near Eastern cultures, the Lydians established cultural, economic, military, and diplomatic ties to both the Greeks to their west, and the great empires to the east and south, the Assyrians, Babylonians, Egyptians, Phrygians, and others. The downfall of the Lydians despite their wealth, and the perils of the hubris of King Croesus has been reflected in literature since ancient times.

The Lydians developed their capital city with a distinctive system of monumental terraces, creating a scheme of urban planning unlike those of the Greeks, Egyptians, or other peoples of the Near East. They protected the city with a regionally distinctive twenty-meter-thick fortification

wall. The necropolis of Bin Tepe is located seven to seventeen kilometres north of the citadel of Sardis, which includes more than 119 tumuli. The three large tumuli at Bin Tepe are amongst the largest tumulus tombs in the world, and amongst the first to include features such as the crepis wall and marker stones.

Criterion (iii): Sardis and the Lydian Tumuli of Bin Tepe testify to the Lydian civilisation, a native Anatolian people in western Asia Minor during the 1st millennium BCE. The property bears testimony to a vanished culture that had a profound impact on the history of the ancient world though its architecture, customs, and cultural practices. The Lydians had their own language and worshipped a unique pantheon of gods. The city of Sardis had a distinctive urban plan and architecture, and its terracing system served as a prototype for other terraced cities. The tumuli in Bin Tepe are amongst the largest in the world. The Lydians also invented the world's first coinage, and their rapid expansion was facilitated by immense wealth, based on gold.

Integrity

The serial property comprised of two component parts includes all the attributes needed to convey its Outstanding Universal Value, including the full extent of the Lydian city of Sardis and the associated tumuli at Bin Tepe. The boundaries are appropriate, and the buffer zones provide protection to the settings of the component parts. The important visual connection between the two component parts will be strengthened once a single encompassing buffer zone has been implemented. The property exhibits overall an adequate state of conservation, supported by ongoing maintenance and continuing research.

Authenticity

The serial property is a well-preserved archaeological site that retains a high level of authenticity in relation to the Outstanding Universal Value. More than seventy years of excavation and research have revealed a remarkable quality, quantity and variety of archaeological remains with a high level of preservation. Work has been carried out to consolidate excavated structures throughout the Sardis component part. There is a substantial archive of archaeological reports and data, alongside significant artefact collections derived from Sardis. Nonetheless, some past actions have reduced the authenticity of the property, such as some of the reconstructions at Sardis, and looting of the tumuli at Bin Tepe. There are challenges to presenting the Lydian city because of the important structures and layers of archaeological material associated with later civilisations that inhabited it. The wider landscape setting connects the two component parts (and the features they contain) and underpins the authenticity in terms of their location and setting.

Protection and management requirements

All necessary measures for the protection of the archaeological site and its setting are in place.

Each of the component parts is designated as a 1st and 3rd degree archaeological conservation areas by the Izmir No. 2 Regional Council for Conservation of Cultural Properties, ensuring their protection through the provisions of the national Law on the Conservation of Cultural and Natural Property No. 2863, (23 July 1983) as amended by Law No. 5226 (14 July 2004). In addition, some attributes in each of the component parts have been registered individually as cultural properties. Some portions in the southern part of the Sardis component part are not protected to the same level within the national laws. It is encouraged to align the 1st degree archaeological conservation areas with the boundaries of the component parts in future.

The buffer zones and wider setting are designated as 3rd degree archaeological conservation areas by the Izmir No. 2 Regional Council for Conservation of Cultural Properties. This protection is also provided by the implementation of strategic national and regional plans, and through plans relating to specific locations. Many of these, including the mandatory regional conservation plans are currently in preparation.

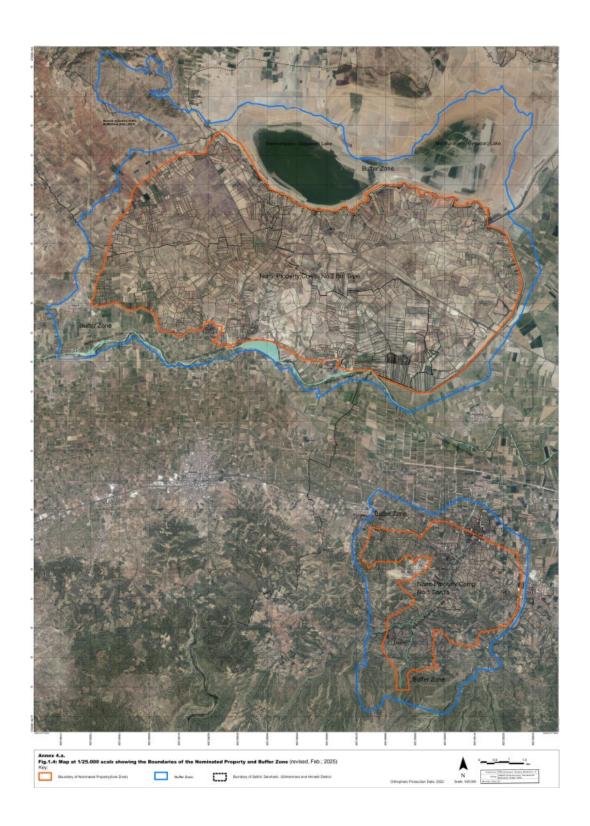
Regular maintenance of archaeological features is planned, implemented and monitored through the Sardis Expedition (Harvard Art Museums) conservation programme. A Site Management Plan has been developed to meet the future management needs of the component parts and buffer zones, and to coordinate efforts from many bodies, groups, and individuals. Visitor management actions are planned, as well as improvements to the interpretation of the Lydian elements and of the property as a whole.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Continuing the programme of digitising the archive of records in order to improve access, provide a basis for monitoring and management, and enhance awareness of the property,
- b) Providing a single buffer zone, through a minor boundary modification request, integrating the two existing buffer zones in order to recognise and protect the significance of the wider setting and the importance of the visual connections between the two component parts,
- Revising the delineations of the 1st degree archaeological conservation areas to align with the boundaries of the component parts in order to ensure consistent levels of protection,
- d) Considering the possibility of extending the buffer zone to include all of Lake Marmara once projects to return water to the lake have been completed,
- e) Continuing to develop and finalising the following conservation plans and programmes as a priority:

- Comprehensive property-wide conservation strategy and maintenance programme to enable the appropriate allocation of human and financial resources,
- Conservation Development Plans for Sardis and Bin Tepe (1:5000 and/or 1:1000 scale and associated planning guidance),
- Urban Design Guidelines for each village in and near the property and buffer zones,
- Landscape Plan that will, in part, assist in the appropriate location of new tourism infrastructure,
- Izmir Regional Conservation Plan to provide a base line for future decision making,
- Sustainable tourism plan and an interpretation plan that coherently addresses the opportunities, issues and significance of both component parts, and better illuminates the Lydian attributes,
- f) Implementing the planned measures outlined in the Site Management Plan to address the impacts of agricultural uses of private land within the component parts and buffer zones, including engagement with landowners and effective monitoring and enforcement,
- g) Implementing actions outlined in the Site Management Plan to counter looting and illicit excavation as a matter of urgency, including through protection solutions that engage the local community,
- h) Prohibiting all new mining and quarrying licences within the property and the buffer zones,
- i) Incorporating Heritage Impact Assessment processes into relevant legal frameworks,
- Enhancing collaboration with the relevant national and regional authorities to ensure that any future transportation infrastructure and other developments avoid impacts on the property, buffer zones and wider setting and fully integrate the conservation of cultural heritage,
- k) Building on the programme established in cooperation with the Sardis Expedition to develop a research agenda and strategy that encompasses both component parts with a focus on exploiting existing data and research, together with ongoing and new programmes of non-invasive fieldwork,
- Providing additional means of including local community representation in the management system to strengthen the long-term conservation and presentation of the property.



Revised map showing the boundaries of the nominated component parts (February 2025)

III Cultural properties

A Africa

New nomination Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination

Nomination deferred by a previous session of the World Heritage Committee

Huichol Route (Mexico) No 1704

1 Basic information

Official name as proposed by the State Party

Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé)

Location

Nayarit State
Jalisco State
Zacatecas State
San Luis Potosí State
Durango State
Mexico

Brief description

This serial property of twenty component parts delineates a corridor of more than 500 kilometres through north-central Mexico. This route is made up of places and landscapes of sacred importance to the Wixárika Indigenous Peoples that traverses the Mexican states of Nayarit, Jalisco, Zacatecas, San Luis Potosí and Durango. The route is not a path or road but is described as a "braid of trails". The nominated property is deeply linked to the spiritual, ritual and cultural practices of the Wixárika people. The route begins in the southern part of the Western Sierra Madre, known as the Huichol Sierra, the heart of the ancestral lands of the Wixárika. In a series of eighteen component parts with sacred sites and landscapes, the route moves in a northeastern direction towards the sacred landscape of Huiricuta (Wirikuta) which is located to the southeast of the Chihuahuan Desert. Two further component parts with sacred sites are included on the basis that they are also part of the pilgrimage traditions and are linked to the spiritual worldview of the Wixárika. These are the coastal site of Tatei Jaramara (Nayarit State), and the site of Hauxa Manaka, located to the north of the start of the route (Durango State). Together the twenty component parts and the route to Wirikuta traverse a number of ecological regions that are important for their biodiversity and other natural values. The cycle of the rituals along the route are practiced to maintain relations with the natural elements considered as ancestral deities, to ensure the success of the milpa agricultural cycle, and to support the general welfare of the people. The nominated component parts comprise the sacred route to Wirikuta - the Path of Our Grandfather Fire - "Tatehuarí Huajuyé".

Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of twenty *sites*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

6 December 2004 (as a mixed property)

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in March 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 19 to 29 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 20 September 2024 requesting further information about planned and approved development projects, governance and management, tourism, interpretation and visitor management, Indigenous Peoples' rights, and cultural landscapes.

Additional information was received from the State Party on 4 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on: the Wixárika people, routes and sacred sites, the sequence of the route, the potential addition of a new component part (Cerro Gordo, Durango), the selection of component parts, the justification for criterion (v), the tangible attributes of Outstanding Universal Value, management, legal protection, right of access, mining concessions, naming protocols, community engagement - Free, Prior and Informed Consent, and photographs.

Additional information was received from the State Party on 27 February 2025.

Note: The name Huichol is used interchangeably with Wixaritari or Wixárika in the nomination dossier; and the name of Huiricuta is also expressed as Wirikuta. In the additional information of February 2025, the State Party clarified that all of these are valid. In this report, ICOMOS mostly uses the terms Wixárika and Wirikuta except when referring to the name of the nominated property and other instances where Huichol is used in the formal name of laws, documents and so on.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The nominated property delineates a corridor of more than 500 kilometres through north-central Mexico through the Mexican states of Jalisco, Zacatecas and San Luis Potosi; plus two sacred sites, one located on the west coast of Mexico (Nayarit State), and one located to the north of the starting point of the route (Durango State). The route is described as a "braid of trails".

In the additional information received in February 2025, the State Party further explained that the paths to Wirikuta are complex and diverse and are based on topography and ritual obligations. While individuals and families make frequent visits to sacred sites dispersed all over the Wixárika cultural geography throughout the year, the annual full-length pilgrimage follows the sequence in the nomination.

This nominated property is based on the spiritual, ritual and cultural practices of the Wixárika, one of the Indigenous groups of Mesoamerica that has survived with vitality. Their territory is rugged and remote, and their survival has been based on a collective will to continue their ancestral traditions, and their spiritual and material connections with nature. According to the Wixárika worldview, the origin of Mother Earth is related to the water that came down from the hills, through the rivers that brought life to the sea. The origin of life is related to the five cardinal points (south, north, east, west and centre), where the elements of nature live: woman, corn, deer, peyote, wolf, fire, sun and sea.

In the additional information of February 2025, the State Party clarified the larger context of the Wixárika communities in the area south of the Western Sierra Madre (where the states of Jalisco, Nayarit, Zacatecas and Durango converge). A map was provided showing six main communities, which occur in three main groups: Tatei Kie (western group) consisting of Tatei Kie, Uweni Mu Yewe and Xatitsarie; Wautia (southern group), consisting of Wautia and Kuruxi Manuwe; and Tuapurie (eastern group).

The Wixárika people maintain rituals in their daily lives that emulate the creation of the planet or Mother Earth and life, through the culture of visiting and preserving the five cardinal points that articulate the universe. The socioenvironmental philosophy that supports the worldview of the Wixárika people integrates human beings with the planet as a whole. Culturally significant plants and medicine species are collected as part of the pilgrimage. Participants

leave offerings and participate in ceremonies that are considered indispensable for the continuation of agriculture. The route is a focus for rituals, trade, intergenerational education and sharing of knowledge.

The route at the centre of this nomination is a sacred journey that Wixárika make annually from the Western Sierra Madre to Wirikuta, a key site in their cosmogony, where, according to their tradition, the sun was born and the world originated. This ritual journey symbolises the return to the origin of life, the re-creation of the universe and the renewal of its relationship with the gods, ensuring the balance of the cosmos and the well-being of the communities.

The route begins in the southern part of the Western Sierra Madre in the Huichol Sierra, the heart of the ancestral lands of the Wixárika. It runs in a northeastern direction towards the sacred landscape of Wirikuta which is located to the southeast of the Chihuahuan Desert. The route moves through a number of ecological regions, including mountains, scrubland plateaus, lagoons and wetlands, some of which are important for their biodiversity and other natural values. The route also passes through some areas of urban and rural settlements.

Commonly occurring cultural features include: *xiriquis* (shrines), *milpas* (traditional maize fields), pre-Columbian roads, and sacred sites based on various landforms (hills, rock formations, wetlands, springs) that are linked with corn, the Golden Eagle, wolf, deer or peyote.

Each of the twenty component parts is proposed as a sacred associative cultural landscape and is briefly summarised below. There is one component part located in Jalisco, six component parts located in Zacatecas, one component part located in Nayarit, one component part located in Durango, and eleven component parts located in San Luis Potosí.

The area of the nineteen initially nominated component parts totalled 135,360.66 ha, with buffer zones totalling 512,473.05 ha. The twentieth component part was added by the State Party during the evaluation procedure. In the additional information of February 2025, the State Party advised that the revised area of the twenty component parts totals 135,420.66 ha, with buffer zones totalling 513,966.18 ha.

State of Jalisco

• Component part 01JAL: Tuapurie

This component part is located in the mountainous region of the Huichol Sierra where the Tuapurie Wixárika settlement is located. The sacred landscape of Tuapurie contains human settlements (rancherías), traditional agricultural systems based on milpas or coamiles, ceremonial centres notable for their vernacular architecture, shrines, and a total of thirty-seven sacred sites. Within this area is the sacred site of Teeacata, the initial point of the pilgrimages.

Although there are different ceremonial centres and variations on the route for the different Wixárika communities, the additional information of February 2025 clarified that the axis for all of them is the sacred site of Teeacata located in the Tuapurie Community. The State Party stated that all the Wixárika communities have agreed to this formulation, with the start of the route at Teeacata, due to its hierarchy in the ritual cycle.

State of Zacatecas

- Component part 02ZAC: Cuyetsarie
- Component part 03ZAC: Xurahue Muyaca
- Component part 04ZAC: Cupuri Mutiú
- Component part 05ZAC: Cacai Mutijé
- Component part 06ZAC: Macuipa
- Component part 07ZAC: Tatei Nihuetúcame

Component part 02ZAC is located in a mountainous region in the Monte Escobedo Sierra known for deer hunting, and ancient petroglyphs and comprises four sacred sites. A ritual deer hunt is performed there. Located in a forested region of Cardos Sierra, component part 03ZAC is considered to contain a forest of petrified ancestors in the form of rocks and hills. There are eight sacred sites within this component part. Component part 04ZAC is a small area in a peri-urban setting on the outskirts of Jérez. It is formed by a small wetland and is a sacred site. Component part 05ZAC is located in scrubland with hills and rocky outcrops located southwest of the city of Zacatecas. The habitat for the Golden Eagle is found here. There are four sacred sites within this component part, which is considered to be a threshold within the route. Finally, Component part 06ZAC and 07ZAC are sacred hills located in the urban environment of Zacatecas. The gourd bearers begin their fasts at Macuipa, and Tatei Nihuetúcame is a manifestation of Mother Earth. Component part 06ZAC has one sacred site which acts as the second door in the ritual sequence; and component part 07ZAC has three sacred sites.

According to the State Party, component parts 04ZAC (Wautia Branch) and 06ZAC (Tatei Kie Branch) function as points where different communities join the Tuapurie Branch to continue the path to reach Wirikuta.

State of San Luis Potosí

- Component part 08SLP: Huahuatsari
- Component part 09SLP: Cuhixu Uheni
- Component part 10SLP: Tatei Matiniere
- Component part 11SLP: Nihuetaritsié
- Component part 12SLP: Natsitacua
- Component par 13SLP: Uxa Tequipa
- Component part 14SLP Tuy Mayau
- Component part 15SLP: Huacuri Quitenie
- Component part 16SLP: Huiricuta: Mucuyahue
- Component part 17SLP: Huiricuta: Raúnax
- Component part 18SLP: Huiricuta: Maxa Yaritsie

Component parts 08SLP and 09SLP are located on a large high plateau, an area of agricultural and pastoral land uses.

They are both low hills, and together they form the northern and southern element of the third door for the route. Component part 10SLP is a small wetland with a series of springs with sacred water located on the outskirts of the village of Yoliatl. It comprises four sacred sites and is considered a primary area for female deities. Located on the San Luis Potosí High Plateau, component part 11SLP has two hills with an abundance of yucca with two sacred sites; component part 12SLP is an intermittent lagoon that is a sacred site; and component part 13SLP is also a sacred site and features rocky outcrops covered in a lichen used for rituals. It is a threshold site on the route. Component part 14SLP consists of a wetland area providing freshwater all year in the middle of the arid Chihuahuan Desert, and a sanctuary for wildlife. It comprises five sacred sites and is a place where gourd bearers and pilgrims cleanse themselves, deliver offerings and collect holy water. The stems of the uxa plant are collected and used for adorning faces and ritual objects.

Component parts 15SLP and 16SLP comprise the sacred landscape of Wirikuta. The Wixárika believe that different deities live there and anoint visitors. The whole area is filled with spiritual associations. It is considered to be a great temple (xiriqui), and many rituals are performed. Huacuri Quitenie (15SLP) has eight sacred sites and is the fourth door that marks the entrance to Wirikuta; and the sacred landscape of Mucuyahue (16SLP) is considered to be the heart of Wirikuta. It comprises two sacred sites. Among other important plants, peyote is found there, and there are extensive rituals for gathering and consuming it.

Component parts 17SLP and 18SLP are located in the Catorce Sierra on the southern end of the Chihuahuan Desert, which has the highest peaks of the desert. It is one of the most arid areas on the route and is important for plant and animal species and habitats. The final altar is located at Raúnax (17SLP), which has twenty-nine sacred sites, and is the destination of the route. Maxa Yaritsie (18SLP) is located in a pine-oak forest within the Chihuahuan Desert and is the habitat for the White-tailed Deer, Red-tailed Deer and Golden Eagle (including its nests). Offerings are made here for various deities, particularly the deer and eagle. This component part includes one sacred site.

State of Nayarit

• Component part: 19NAY Tatei Jaramara

This component part is located on the coast in the southern portion of a National Wetlands which has one of the best-preserved mangroves in the North American Pacific. It comprises four sacred sites. The Wixárika believe that five generations of ancestral beings emerged from the sea here and established themselves at Tatei Jaramara before making the first pilgrimage to Wirikuta. The sea is associated with the underworld, a place where Wixárika travel initially after death before returning to their communities and then to Wirikuta. Rituals venerate ancestors and bring rain to the Huichol Sierra.

In the additional information of February 2025, the State Party clarified the connection of this site to the route to Wirikuta (since it is not within the trails from Tuapurie to Wirikuta). The State Party explained that while this site can be visited at other times in the year, it is closely associated with the annual pilgrimage to Wirikuta, because it was the beginning of the Path of Our Grandfather Fire in primordial times, and that it is closely linked to the agricultural system of the *milpa*, as the water collected from the ocean is used to bless the maize parcels (*coamiles*) in Tuapurie.

State of Durango

Component part: 20DUR Hauxa Manaka (Cerro Gordo)

In the additional information received in November 2024, the State Party proposed an additional component part - Hauxa Manaka (Cerro Gordo), located in the state of Durango. This is a known sacred site of immense cultural importance. It is important in Wixárika cosmology associated with the myth of the flood and is believed to be the place where maize seeds were spread for the first time.

This component part features the tallest peak in Durango and the Western Sierra Madre and has old-growth spruce forests that have important biodiversity values. A federal decree for its protection was made by the Mexican Government in August 2023. In the additional information of February 2025, the State Party informed that the late inclusion of this component part in the nominated serial property was in response to a petition from Wixárika communities; and that this has been agreed by local landowners. The protection and management of this site are fully endorsed by the government of the state of Durango, the National Institute of Anthropology and History (INAH), and all federal related institutions as per the Federal Decree of Sacred Sites (2023).

The State Party also clarified the connection of this component part to the route to Wirikuta (since it is not within the trails from Tuapurie to Wirikuta, and not directly part of the Path of Our Grandfather Fire). Because this is where seeds were spread for the first time, and where gourds (*jicaras*), arrows, maize and magic feathers were born, the site is inextricably part of the pilgrimage to Wirikuta (which utilises these materials).

Overall, the route passes through areas considered by the State Party to be of high significance for their natural values, including different ecosystems and habitats for more than 4,000 species of vascular plants and 550 species of vertebrate animals. These areas also demonstrate agro-biodiversity.

Wirikuta is known for the presence of the endemic cactus known as peyote (*jicuri* or *Lophophora williamsii*), which has psychoactive effects. The Wixárika consider that peyote is equivalent to a book in which all knowledge resides. Peyote is gathered by the Wixárika and is taken as part of rituals intended to receive the "gift of seeing" and is associated with sowing and harvest ceremonies. Peyote is

an endemic species to the Chihuahuan Desert and is included in the IUCN Red List of Threatened Species as a vulnerable species. In Mexico it is classified as a species subject to special protection, and it is included in CITES Appendix II. Wirikuta is also a habitat of the Golden Eagle, a cultural symbol of Mexico.

State of conservation

The state of conservation is dependent on the continuing traditions of the Wixárika people and the integrity and conservation of biodiversity, natural processes and landforms. There is an active management of most component parts by the Wixárika and state authorities, and many are within designated protected areas.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the nominated property varies but is generally good. There are adverse effects of development and neglect, and threats arising from land use changes in some areas. The state of conservation is considered to be vulnerable due to the factors noted in this report.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are mining activities, uncontrolled tourism, urban development and access through private land. In some areas, criminality and drug trafficking is also a factor with potentially serious impacts on the nominated property.

Component parts 16SLP (Huiricuta: Mucuyahue) and 17SLP (Huiricuta Raúnax) have been threatened by international interest in mining the area, as well as destructive industrial agricultural practices and overtourism. In the additional information received in November 2024, the State Party advised that the potential for lithium exploitation was recently discovered in the area around component parts 10SLP and 11SLP, although there are no approved projects associated with these deposits. There are also some agro-industrial projects occurring north of component part 16SLP which the State Party considers has minimal potential to impact on the nominated component part.

Mining activities are a concern for the protection of biodiversity, sacred sites, and the continuity of the Wixárika pilgrimage rituals. ICOMOS notes that, in 2011, the federal government granted a large number of mining concessions for the extraction of silver and other precious minerals in the area of Wirikuta. In the additional information received in November 2024, the State Party advised that from 2011, the Wixárika Regional Council (Consejo Regional Wixárika, CRW) has presented a legal protection claim against the granting of these mining concessions, and there has been a suspension of mining until this case is resolved.

The nomination dossier includes corrective measures, such as strengthening protected areas, defining buffer zones, and developing a management plan incorporating the participation of Indigenous communities and interinstitutional coordination. Significant measures taken by the State Party to protect the nominated component parts and their buffer zones from the impacts of mining, such as the designation of Natural Protected Areas (NPA) and the suspension of concessions in certain zones. ICOMOS notes with concern that there have been past examples of where there has been a lack of rigorous enforcement.

In the additional information received in November 2024 and February 2025, the State Party provided details about the legal provisions that protect sacred sites from the impacts of mining, including modifications in 2023 to the Federal Mining Law that require Prior, Free, Informed, Culturally Appropriate and Good Faith consultation with Indigenous Peoples prior to the granting of mining concessions, as well as studies of environmental and social impacts. Additionally, the Government of Mexico established a prohibition on exploration, exploitation, and mining processing works within NPAs which is further strengthened by the Federal Decree of Sacred Sites (2023) which grants legally protected status to sacred sites used by Indigenous Peoples for their ceremonies and spiritual practices as well as associated ecosystems. On this basis the State Party can ensure that there will be no new mining concessions or permits related to mining or other industries that could have negative impacts on the nominated component parts or the buffer zones.

Because contemporary mining operations can have impacts on sacred sites and landscapes, as well as the associated fauna, flora and aquifers even if located some distance outside the designated boundaries, ICOMOS considers that mining is a continuing potential threat that will require consistent law enforcement by federal and state governments.

In the additional information received in November 2024. the State Party clarified that additional tourism-related pressures are not anticipated. However, ICOMOS notes that some aspects of tourism are already creating unsustainable impacts, that particularly results in an overexploitation of peyote at San Blas and Wirikuta. The demand for peyote by tourists interested in psychoactive experiences has generated an unsustainable use of this sacred plant, affected biodiversity, and compromised the availability of peyote for traditional rituals. Some measures have been implemented, such as restricting access to specific areas and strengthening environmental and cultural education programs for visitors on the cultural importance of peyote, but there are still negative impacts from unregulated tourism suggesting that further policies and programs are needed.

The pilgrimage undertaken by the Wixárika requires free transit through the land to reach their sacred sites. For this reason, urban development, settlement infrastructure and the demarcation of private properties (including with barbed wire fencing) can restrict access for the Wixárika

in many parts of the route, especially in Zacatecas and Jalisco. The construction of infrastructure and urban expansion could further fragment these territories and make it difficult to carry out traditional ceremonies. Some measures have been implemented to regulate urban development in nearby areas, such as defining buffer zones and creating agreements with private landowners. The additional information received in February 2025 provides details of federal and state laws that protect the right of access by the Wixárika through different types of ownership. The Integrated Management, Conservation and Safeguarding Plan (2024-2030) (IMCSP) calls for cooperation between local communities and governments to resolve private land conflicts and secure the right of way along the pilgrimage route. Where needed, negotiation of agreements with private property owners is recommended.

In the additional information received in November 2024, the State Party advised that there are no plans or projects for the construction of large-scale energy or transportation infrastructure in or around any of the nominated component parts. However, it is also noted that the Program for the Integral Well-Being of Indigenous Peoples and the Justice Plan for the Wixárika, Na'ayeri, O'dam and Meshikan Peoples (2022) supports communities by constructing or expanding basic infrastructure for communications and roads based on the requests from the communities themselves.

ICOMOS considers that the state of conservation is generally good, but that it is vulnerable to a range of potential and actual pressures that are not all sufficiently managed. The main factors affecting the nominated property are mining, restrictions of access through private property and inappropriate tourism activities (particularly the collecting and consumption of peyote). The well-being of the Wixárika communities and of the natural landscapes and processes are important for the ongoing state of conservation.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé) is the most representative living relic of the ancestral ceremonial and trade routes that connected the peoples of the Americas for millennia.
- The route is a unique living remnant of ancient pre-Columbian pilgrimage routes of the region.
- The associative cultural landscape is based on a long continuity of cultural traditions that have adapted through time and space to ensure the success of agricultural cycles and welfare of the people.

 The route is an example of sustainable land-use practices based on the bonds between spirituality and elements in nature

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value are: the route as outlined by the twenty component parts, natural features, species and landscapes that have cultural meaning, sacred sites, and traditional practices (including agriculture).

The State Party has nominated this property as a cultural landscape, but also as a series of twenty cultural landscapes. In the additional information received in November 2024, the State Party clarified that while the entire route comprises a cultural landscape, each component part also demonstrates the interplay between nature and humanity, and that it is this dimension that imbues the territory with meaning. The continuous and dynamic relationship of the Wixárika culture with their sacred landscapes, and the way they relate to their territory through social, economic, spiritual, and cultural ties, along with natural elements, are intrinsic qualities.

ICOMOS acknowledges these critically important aspects of the nominated property, including the interplay of nature and humanity and the sacredness of key physical features. However, given the presentation of the twenty component parts as a route with a large territorial span that traverses a range of natural and cultural settings, the use of the cultural landscape category is not applicable to this nomination, even if the management system usefully applies a territorial approach.

ICOMOS considers that some of the assertions in the nomination dossier are not sustained in a wider comparative context, such as the fact that this route represents the only living remnant of a pre-Columbian pilgrimage system in America, or that there are no comparable sites in Mesoamerica with similar values. It is also important to avoid inferences that the Wixárika cultural practices are somehow unchanged since the pre-Hispanic period which is an unreasonably static expectation of any culture. ICOMOS therefore understands the nominated property as a significant and potentially exceptional example of these traditions.

Comparative analysis

The comparative analysis has been developed around the following parameters: landscapes that reflect indigenous living knowledge systems and ancestral practices expressed through the relationship with the environment; landscapes that have strong links between indigenous cultures and nature; an indigenous worldview based on veneration of ancestors or deities in natural sacred sites and pilgrimages; traditional agriculture as a focus of worldview and way of life; and the presence of temples that retain their traditional use and authenticity. It has examined some selected properties throughout the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties as well as other properties.

Ten World Heritage properties are discussed in the comparative analysis, including Qhapaq Nãn Andean Road System (Argentina, Bolivia (Plurinational State of), Chile, Colombia, Ecuador and Peru, 2014, (ii), (iii), (iv), (vi)). This comparison is of particular interest for this nomination as there are some similarities, but also differences given that this road system no longer used for its traditional purposes. Other comparators are from Australia, Canada, Ethiopia, France, Japan, Kenya, Mongolia, New Zealand and South Africa.

Ten Tentative List properties are also discussed including examples from Canada, China, India, Mongolia, Pakistan, Peru, and Vanuatu. None of these is closely comparable to the nominated property.

ICOMOS considers that the most suitable comparative geocultural context for this nomination is Mesoamerica (including Central America, Mexico and the southwestern region of North America), where various indigenous cultures share spiritual and religious practices linked to sacred territories, as well as linguistic connections, common architectural patterns and iconographic motifs, and so on. These traditions reflect a deep connection between Indigenous Peoples and elements of their environments. Within this geocultural context, traditions of pilgrimage and rituals are continuing and/or reviving. These practices are essential to the cultural and spiritual identity of Indigenous Peoples and express a world view in which humans and their ancestors are inseparably related to the processes and features of the natural environment.

The State Party has also briefly discussed some World Heritage and Tentative List properties from Mexico. It notes that there are only two World Heritage properties inscribed as cultural landscapes: the Agave Landscape and Ancient Industrial Facilities of Tequila (2006, (ii), (iv), (v), (vi)); and the Prehistoric Caves of Yagul and Mitla in the Central Valley of Oaxaca (2010, (iii)) which are of limited relevance. The rest of the World Heritage and Tentative List properties of Mexico are not considered to be comparable, because they are not directly linked to living Indigenous groups, and do not share the same assemblage of characteristics. The State Party briefly mentions the Tehuacán-Cuicatlán Valley: originary habitat of Mesoamerica (Mexico, 2018, (iv), (x)) which is associated with the Mazatec people and demonstrates agrobiodiversity, but with cultural traditions that differ from the Wixárika.

ICOMOS considers that other properties and cultural areas within Mexico further illuminate the particular distinctiveness of the nominated serial property. For example, the Archaeological Monuments Zone of Xochicalco (Mexico, 1999, (iii), (iv)) was built around a cave with a solar zenith passage, and is a good example of the ways that these sites were designed to focus on observation of natural cycles. Other Mexican World Heritage properties such as the Pre-Hispanic City of Chichen-Itza (1988, (i), (ii), (iii)) and the Pre-Hispanic City of Teotihuacan (1987, (i), (ii), (iii), (iv), (vi)), and other

World Heritage sites in Mesoamerica can be understood as complementary to the ontological perspective of the contemporary Wixárika, allowing similarities and differences to be more clearly articulated.

The State Party briefly lists six other Indigenous cultural groups that have some shared characteristics with the Wixárika and also mentions the Hopi Peoples of Arizona (United States of America). In addition to these, ICOMOS observes that there are other Mesoamerican pilgrimage traditions that are relevant to the comparative analysis. The State Party acknowledges some of these but asserts that the Wixárika culture is the least Christianised and has maintained its pre-Hispanic legacy more vigorously. For this reason, the State Party considers that none of the other cultures analysed has the same degree of its pre-Hispanic organisation. Other differences are identified such as the use of the pre-Hispanic tuquipa, and the milpa agricultural system, although ICOMOS notes that the milpa system of traditional agriculture is practiced, in somewhat different forms, across a large area and is not unique to the Wixárika.

The State Party argues that other cultural groups do not share the same degree of rigour or complexity of veneration of ancestors and deities in nature throughout a geography as extensive and ecological diverse as that of the Wixárika biocultural corridor. The Tarahumara (Rarámuri) use pevote for their rituals on the pilgrimage routes in the Sierra Madre Occidental, although the State Party notes that these practices have been affected by Christianity and lack the structure and complexity of the Wixárika pilgrimage. Nevertheless, these pilgrimages involve complex rituals and reflect a deep connection to the landscape. The Cora (Náayeri) people also have many similarities with the Wixárika, and practice pilgrimages, but on a smaller scale, and do not have the living temples like the tuquipa. Other cultural groups have also been considered, such as the Mazatec people, who were relocated in the mid-20th century due to a dam project that flooded some of their sacred sites; the Lacandon people, who have ancestral Mayan cultural elements (including milpa systems), but do not have living temples like the tuquipa; and the Tepehuán (O'dam) and O'odham peoples, who also make treks to bundle together substances and objects that are thought to contain spiritual energies.

Pueblo pilgrimage sites in the Southwestern United States include the World Heritage property of Chaco Culture (United States of America, 1987, (iii)) which holds cultural, historical, and ecological importance comparable to Wirikuta. It is considered sacred by multiple Pueblo groups, including the Zuñi, Navajo, and Apache. Chaco Canyon boasts exceptional archaeological richness, including rock art from various historical periods.

The traditions of the O'odham and Hopi are relevant for the comparative analysis, because they continue to undertake comparable ritual pilgrimages. The State Party notes that the pilgrimage on the Ruta de la Sal is carried out by small numbers of O'odham people and lacks the vitality of the Huichol Route. The State Party acknowledges many similarities between the Hopi and Wixárika peoples, which could be better elaborated to fully appreciate the comparative context for this nomination.

ICOMOS notes that many of the comparable pilgrimage traditions of Mesoamerica have experienced significant disruptions and transformations due to colonisation and religious conversions, and the impacts of deforestation and destruction of ecosystems. Within this complex geocultural context, the comparative analysis demonstrates the distinctiveness of the practices of the Wixárika, in part because of their expansive range and the strength of their continuing cultural practices.

The final part of the comparative analysis discusses how the component parts have been selected from the larger context of all Wixárika routes and sacred sites. ICOMOS notes that there are other Wixárika sacred places located across the states of Durango, Jalisco, Nayarit, San Luis Potosí, and Zacatecas; and that the nominated route is not the only route to Wirikuta. In the additional information of February 2025, the State Party explained that there are many Wixárika sacred sites, but that the communities wish to maintain some of them as private. The twenty component parts are those that have been selected by the Wixárika and are the most important for the pilgrimage route. The paths to Wirikuta are complex and diverse and are based on topography and ritual obligations; but the annual full-length pilgrimage follows the sequence presented in the nomination, and has been agreed by all Wixárika communities.

ICOMOS considers that the comparative analysis justifies the rationale for the selection of the twenty component parts and the consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of cultural criteria (iii), (v) and (vi).

Criterion (iii): to bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated property is one of the last living testimonies of ancient pre-Columbian pilgrimage routes in the Americas. It is an exceptional remnant of the former ceremonial and trade routes that connected the peoples of the American continent for millennia and expresses the connections between spirituality and nature. The route and the sacred sites are central to the beliefs, world views and ceremonial cycles of the Wixárika people.

ICOMOS considers that the nominated property is one of the most representative pre-Columbian routes still in use in the Americas and is an exceptional testimony of the continuing cultural traditions of the Wixárika people. The annual pilgrimages of the Wixárika to Wirikuta are a clear manifestation of a spiritual tradition, reflecting a specific worldview that connects humans with nature and the sacred realm. The route bears witness to the intimate cultural knowledge that the Wixárika have of these lands, plants and animals. Although the route is a possible remnant of ceremonial and trading routes, its importance today is in relation to the spiritual and cultural continuity of Wixárika culture and the inter-generational transmission of cultural knowledge.

ICOMOS considers that this criterion is demonstrated.

Criterion (v): to be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;

This criterion is justified by the State Party on the grounds that the component parts within the nominated property exhibit the ancient settlement and farming patterns, as well as the settings for ceremonies and rituals. Together, these illustrate the complex systems of land use. The practices of pilgrimage are oriented at sustaining the agricultural cycle, and the ritual cycle is related to the agro-biodiversity of the region, including traditional agriculture, hunting, gathering and fishing activities.

As regards the justification of this criterion, the State Party clarified in the additional information of February 2025 that the main purpose of the pilgrimage along the route (including Tatei Jaramara and Hauxa Manaka) and the rituals performed in the sacred sites, is to maintain positive relations with the deified ancestors that embody specific elements that control nature, to allow for fertility and bring rain to the coamiles (maize parcels) located in the homeland in Tuapurie. It is in this sense that there is a functional and spiritual interconnectedness between pre-Hispanic ritual practices, the hunting and gathering of a wide array of species along the route, and the maize parcels. The State Party provided a useful diagram to illustrate that it is all these elements that comprise the Wixárika milpa system, even though the traditional settlements, coamiles and tuquipas are located in Tuapurie (component part 01JAL). The State Party also argues that the milpa system was once widespread across Mesoamerica but has become reduced in complexity and cultural meaning through the processes of colonisation, Christianisation and globalisation.

ICOMOS appreciates these clarifications, and notes that the justification of this criterion rests on the Wixárika traditional *milpa* agricultural system and practices. It is clear that the rituals conducted during the pilgrimage to Wirikuta are oriented toward the success of these practices. ICOMOS acknowledges that traditional forms of land use connect people with the environment and with deities and ancestors. ICOMOS also notes the diversity of ecosystems included in the nominated property, and the close and inter-related relationships between the Wixárika people and the biodiversity and agro-biodiversity

of these regions. At the same time, ICOMOS notes that the arguments presented for this criterion extend beyond the pilgrimage practices of the Wixárika to encompass much of their overall way of life, including agricultural methods, relationships with the environment, religious beliefs, settlement patterns, and so on. It is also the case that the described cultural aspects such as *milpa*, *coamiles* and ceremonial centres are known to be fundamental elements of the cultures of the Mesoamerican cultural area.

ICOMOS acknowledges that milpa traditional agricultural practice is deeply embedded in both daily life and rituals, and that the pilgrimage to Wirikuta is oriented at ensuring rainfall and a successful harvest. ICOMOS considers that the tangible expressions of these traditions and land-use practices are not well-represented within the nominated component parts (other than component part 01JAL), because the nomination has been focused on the pilgrimage route. Despite the useful additional information that has been provided, ICOMOS does not consider that the comparative analysis supports the arguments based on the settlement and/or milpa land-use traditions of the Wixárika. Based on all the information that has been received, ICOMOS considers that this is not the focus of what makes the nominated serial property potentially exceptional.

ICOMOS considers that this criterion is not demonstrated.

Criterion (vi): to be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that the nominated route maintains the spirituality of the Wixárika. The route traces the travels of ancestor deities and involves elements of nature that have direct kinship with the Wixárika. Specific landforms, weather, plants and animals reveal the ancestors, and each component part has specific ritual meaning. Flora and fauna with ritual meaning include tobacco, peyote, deer, and the Golden Eagle. During the travels through this route, elders transmit their knowledge to younger generations through oral traditions, dance, stories, art, music and rituals.

ICOMOS considers that the nominated property is an outstanding illustration of the inter-relationship between culture and the natural environment in the spiritual practices of the Wixárika people. The sacred sites are imbued with a deep spiritual meaning, representing different elements of the Wixárika worldviews and beliefs. The Wixárika are an impressive example of a complex indigenous culture that has maintained links to precolonial practices and belief systems in Latin America. Their oral history and ritual practices are embedded in and strengthened by the route through the sacred sites to Wirikuta.

ICOMOS also notes the material presented by the State Party concerning the current use of artistic forms that date to pre-colonial times in forms such as weaving, embroidery, yarn paintings and the making of different sacred and household items.

ICOMOS considers that this criterion is demonstrated.

ICOMOS considers that the attributes of the nominated serial property are: the continuing intangible cultural heritage practices of the Wixárika people; the route and associated rituals between Tuapurie and Wirikuta (including the sacred sites of Tatei Jaramara and Hauxa Manaka) as outlined by the twenty component parts; landforms, natural features (such as forests and water bodies), plant and animal species and landscapes that have cultural meaning; sacred sites; and vernacular buildings and traditional land-use practices of the *milpa* system.

In the additional information received in February 2025, the State Party provided more details about the tangible attributes of the nominated component parts. These include the *coamiles, tuquipa* ceremonial centres, *xiriquis* and approximately 200 settlements (rancherías) that demonstrate vernacular building traditions. These are all located at Tuapurie (01JAL). In addition to these, an inventory of other tangible attributes such as petroglyphs, cave paintings, pre-Hispanic trails and colonial roads was provided. Some of the other component parts have their own *xiriquis* (shrines) where offerings are left, also testifying to the complexity and cultural meaning of their handicraft. However, for most component parts other than Tuapurie (01JAL), the key tangible attributes are elements of the natural landscape that are imbued with cultural meaning.

ICOMOS considers that the nominated serial property meets criteria (iii) and (vi), but that criterion (v) has not been demonstrated.

Integrity and authenticity

Integrity

The integrity of the nominated serial property is based on the state of conservation and the way major pressures are managed, as well as the intactness of the material evidence of the selected component parts. For serial nominations, integrity is also a measure of whether the component parts contain all the attributes necessary to express the proposed Outstanding Universal Value, and how each component part contributes to that value.

ICOMOS considers that the boundaries of the twenty component parts contain all the attributes supporting the proposed Outstanding Universal Value. The component parts were selected in cooperation with the Wixárika authorities to ensure that the most important sacred landscapes are represented, including mountains, springs, caves, and natural formations with symbolic value for the rituals of the Wixárika people. The selected territories allow for a holistic understanding of the symbiotic relationship between the Wixárika people and their natural environments.

Annual pilgrimage remains a central element of the Wixárika world view and culture, continuing to reaffirm the spiritual connection between the Wixárika people and their sacred territories. The state of conservation of the nominated component parts is generally good, most of them are not affected by visual impacts, which is important for the spiritual experience of the communities. ICOMOS considers that the integrity of the nominated property is vulnerable due to impacts of extractive mining, instances of restricted access through private property, urban expansion and inappropriate tourism and peyote consumption.

A key issue for the integrity of the nominated property is the justification of the selection of the component parts based on the entire territory of the Wixárika. In the additional information received in February 2025, the State Party outlined the current locations of Wixárika communities and explained that all had agreed to the selection of the component parts, including the starting point at Tuapurie (01JAL). Based on this clarification, ICOMOS considers that the integrity of the nominated serial property and of the individual component parts is demonstrated.

Authenticity

The authenticity of the nominated property is based on the ways in which the attributes can be understood as conveying the proposed Outstanding Universal Value.

The authenticity of the route is based on the safeguarding of the spiritual practices, conservation of the natural landscape (including ecosystems, water quality, species and landforms), and the transmission of cultural traditions within Wixárika communities. The landscapes, ritual practices, vernacular architecture, and artistic expressions reflect the continuity of the Wixárika traditions. The rituals, ceremonies and relationship with the landscape are faithful to ancestral traditions.

ICOMOS considers that the nominated property meets the requirements of authenticity as both its tangible (form, materials, location) and intangible (language, traditions, spirituality) characteristics are safeguarded, ensuring that the nominated property will continue to transmit its cultural and spiritual values.

ICOMOS considers that the authenticity of the whole nominated series as well as the authenticity of each of the component parts have been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole nominated series and of the individual component parts have been met.

Boundaries

The number of inhabitants in the nominated component parts is very low. In the additional information received in February 2025, the State Party advised that the total number inside the twenty component parts was 2,662, mostly within component part 01JAL. The total number of inhabitants in the buffer zones for the twenty components

parts was 23,269 (mostly in component parts 01JAL and 10SLP).

In the additional information received in November 2024, the State Party proposed a twentieth component part, Hauxa Manaka (Cerro Gordo) in Durango. In the additional information received in February 2025, the State Party provided further explanations about how this component part is associated with the route to Wirikuta. A map showing the boundaries and buffer zone for this component part was provided.

The boundaries of the nominated property are clearly delineated. They are based on geographic and cultural criteria that consider the sacred relationship between the natural landscapes and the ceremonial practices of the Wixárika people. Pilgrimage routes connect these polygons and encompass sites such as mountains, springs, and caves, all essential to Wixárika rituals and annual ceremonies

The component parts include the elements necessary to express the proposed Outstanding Universal Value of the nominated property. These elements encompass both natural landscapes and key ceremonial sites, all essential to the ritual and spiritual practices of the Wixárika. Each polygon was selected for its cultural and spiritual relevance, ensuring that the most important territories are represented.

The nominated area overlaps with several existing Natural Protected Areas (NPA), including the area in which Wirikuta is located. However, some areas of cultural importance are not fully aligned with existing protected areas and there are others where there are access and land-use conflicts with private landowners and/or mining concessions.

Buffer zones have been established by considering the locations of sacred sites and their settings, particularly associated natural elements (such as mountains, rocks, and springs) and the ancestral rituals of the Wixárika. The main purpose of the buffer zones is to protect both the physical elements and the pilgrimage, as well as associated rituals, such as ceremonial hunting. This involves protection of the individual sacred sites as well as the surrounding roads and areas that connect them. Although legal mechanisms exist for the buffer zones, their implementation has been inconsistent in some areas. Formal protection is in the process of being strengthened, but coordinated effort is required to ensure its effectiveness.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the serial approach has been justified, and that the comparative analysis justifies consideration of the nominated serial property for the World Heritage List. Criteria (iii) and (vi) are demonstrated. The conditions of integrity and authenticity of the nominated series as a whole, as well as each of the component parts, have been met. The proposed boundaries and buffer zones are appropriate.

4 Conservation measures and monitoring

Documentation

The nominated component parts of the route have been extensively inventoried, described, and documented. The inventories detail the cultural and ecological aspects of the sacred territories and pilgrimage sites. There are also many anthropological, archaeological and ecological studies. The inventory and documentation work has been a continuous process since 1998 and intensified from 2015 in support of the World Heritage nomination.

ICOMOS considers that the nomination was insufficiently supported by the documentation, photographs, plans of the component parts and important elements, and clear and detailed maps. It is recommended that the documentation be improved as part of the management and monitoring arrangements, including collaborative processes with Wixárika communities to produce detailed maps of the network of the route and the associated tangible attributes. This process should deepen the understanding of the connections between the sacred sites and landscapes, and contribute to the protection, management, identification of risks, and interpretation of the nominated property.

ICOMOS considers that a research plan, developed in collaboration with Wixárika communities, is needed. The nominated component parts have great potential for future cultural and scientific research, including the complex interactions between local ecosystems and cultural practices.

ICOMOS notes that although there have been many anthropological studies, there is a relative lack of archaeological studies of the ancient settlement patterns, housing, ceremonial sites and the development of agricultural settlements over time within the nominated component parts. The chronological information presented lacks dating evidence that would assist with understanding the deep past of the route. In the additional information received in February 2025, the State Party acknowledges that while potentially rich, archaeological research in this region of Mexico is a pending task to be developed in collaboration with the Wixárika.

Conservation measures

The conservation of the nominated property is a collective effort that combines traditional governance with legal measures to protect and respect the rights of the Wixárika Indigenous People. Conservation is directed by the Integrated Management, Conservation and Safeguarding Plan (2024-2030) (IMCSP) and includes periodic monitoring and maintenance actions. Maintenance is carried out by the Wixárika as part of their ritual traditions. The proposed measures are adequate and seek to maintain the tangible and intangible aspects of the site.

Monitoring

Monitoring indicators have been provided by the State Party in the nomination dossier and are further elaborated in the IMCSP. These cover a wide range of aspects including continuing pilgrimages, agro-biodiversity and the condition of natural flora and fauna and landforms. The State Party has indicated that much of the monitoring will be done by communities through the Wixárika Regional Council (Consejo Regional Wixárika, CRW) supported by a network of other NGOs (such as Conservación Humana A.C, Fundación Real de Catorce Ecológico A.C, Ecomanglar A.C and others) and local organisations. It is acknowledged that training and capacity building will be required.

ICOMOS considers that this is an appropriate scope for monitoring the nominated property, but that it is not very detailed at this stage. The centrality of the communities for these processes is a strength but also needs coordination and capacity building. Further development is needed in order to collect reliable and comparable data that can be aggregated across wide areas in order to inform management and protection actions. The indicators also need to be further developed to address aspects of intangible cultural heritage. Clear responsibilities for monitoring and for the collection and use of monitoring data are also needed.

ICOMOS considers that the proposed monitoring system provides a sound basis, but would need further development so that monitoring across all twenty component parts can be usefully aggregated with the ability to identify trends and emerging pressures. Coordination and capacity building are essential to the approach that the State Party has proposed. Clear responsibilities and periodicity of the indicators should be established, ensuring that these encompass all the attributes of the proposed Outstanding Universal Value (tangible and intangible, natural and cultural). ICOMOS also considers that it would be advisable that the monitoring system be adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The legal protection is provided by a number of state and federal government laws that deal with different areas and different purposes. The National Institute of Anthropology and History (INAH) is the federal agency responsible for the conservation of cultural heritage; and the National Commission for Protected Natural Areas (CONANP) has responsibilities for Nature Conservation Areas.

The General Law of Ecological Balance and Environmental Protection (LGEEPA) establishes the framework for the creation and management of Natural Protected Areas (NPAs), Environmental Impact Assessments, Forestry Policy, Ecological Zoning Plans, and Wildlife Management. The LGEEPA determinates the three levels

of responsibility of the government for the implementation of the law. In addition to biodiversity and environmental services, this law includes the protection of communication routes, the protection of natural settings of archaeological and historic zones, and areas that are important for indigenous culture and identity. The NPAs that protect the nominated component parts are subject to the regulations of the LGEEPA. In the additional information of February 2025, the State Party clarified that threats such as change of land use, mining, roads/transportation infrastructure, water over use, over grazing and industrial agriculture are regulated by the Attorney for Environmental Protection (Procuraduría Federal de Protección al Ambiente. PROFEPA).

The additional information received in February 2025 also provides details of federal and state laws that protect the right of access by the Wixárika through different types of land ownership. Additional information concerning the protection of sacred site from mining was also provided.

In the additional information of November 2024, and in accordance with the United Nations Declaration on the Rights of Indigenous Peoples, the State Party advised that it has recently adopted the Federal Law for the Protection of the Cultural Heritage of Indigenous and Afro-Mexican Peoples and Communities (2023) and the Decree amending, adding, and repealing various provisions of Article 2 of the Political Constitution of the United Mexican States Regarding Indigenous and Afro-Mexican Peoples and Communities (2024). These have further strengthened the rights of Indigenous Peoples and the protection of their cultural heritage. The protection of sacred places and pilgrimage routes has also been recently strengthened by the Decree recognizing, protecting, preserving, and safeguarding the sacred places and pilgrimage routes of the Wixárika, Náayeri, O'dam or Au'dam, and Mexikan Indigenous Peoples, and creating the Presidential Commission for its compliance (2023). It grants legally protected status to sacred sites used by Indigenous Peoples for their ceremonies and spiritual practices as well as associated ecosystems. According to the State Party, this ensures that these areas will not be subject to new concessions or permits related to mining or other industries that create negative impacts.

In additional information of February 2025, the State Party further advised that on 21 February 2025, the Senate of the Republic commenced a consulting process to strengthen the recognition of indigenous sacred sites at a national level, within the framework of the Federal Law for the Protection of the Cultural Heritage of Indigenous and Afro-Mexican Peoples and Communities (2023).

The protection of the environment, and of native species of plants and animals is of direct importance to the protection of the cultural heritage values of the nominated serial property.

IUCN advises that the nominated component parts (including their buffer zones) overlap with three nationally

designated protected areas: C.A.D.N.R. 043 Estado de Nayarit, Ruta Huichola and Huiricuta y la Ruta Histórica Cultural del Pueblo Huichol. Some of these national protected areas are serial in nature as well, with several distinct and fragmented portions that intersect with the nominated property at different points along the route. Component part 01JAL overlaps with the El Carricito and Monte Escobedo Key Biodiversity Areas, and component parts 16-18SLP overlap with the Sierra Catorce Key Biodiversity Area, home to the vulnerable Mountain Plover and endangered Worthern's Sparrow.

IUCN also notes the potential overlap with the distributions of a number of additional threatened species, according to the IUCN Red List of Threatened Species. This may include the endangered Mexican Prairie-dog and vulnerable Black Swift.

The legal frameworks of the various states complement the provisions of the federal laws (including cultural, environmental, and Indigenous Peoples' rights) and institutions that oversee the fulfilment of their laws. At the regional and local levels, San Luis Potosí, Zacatecas, Jalisco, Durango and Nayarit have also adopted specific regulations to protect the nominated component parts. These regulations include environmental conservation and forestry laws, and laws that create state protected areas. For example, the Decree of the Cultural Heritage Site of the Huichol Ethnic Group (state of Navarit, 1990) protects sites and associated rites such as Tatei Jaramara (component part 19NAY). In Zacatecas, the Huichol Route State Park was established in 2009 to protect sacred places and natural resources. In San Luis Potosí, there is a state law that establishes a protected area for the route and the site of Wirikuta. The Marismas Nacionales Ramsar Site overlaps with the boundaries of component part 19NAY.

The national regulatory arrangements are complemented by the development plans of each of the associated Mexican states and municipalities, including the Durango State Development Plan; Jalisco Governance and Development State Plan 2018-2024; Nayarit State Development Plan 2021-2027; San Luis Potosí State Development Plan 2021-2027; Zacatecas State Development Plan (2022-2027); and the municipal development plans for San Blas, Zacatecas, Catorce and Mezquitic.

The nineteen component parts initially nominated occur across sixteen municipalities, and municipal development plans are relevant to the protection of the buffer zones. Local governments have taken measures to avoid unplanned development in areas close to the nominated component parts.

As noted above, the State Party has ratified international instruments for the recognition of the rights of Indigenous Peoples, and the nomination was developed with processes of free, prior and informed consent. The Political Constitution of the United Mexican States mentions Indigenous Peoples and sites of heritage value in various articles, recognising their rights and cultural and social

importance, as well as rights for self-determination and self-governance according to cultural norms and traditions. The federal government recently created the Justice Plan for the Wixárika, Na'ayeri, O'dam, and Meshikan Peoples (2022), which aims to protect their sacred lands and their control and use over them. This World Heritage nomination was one of the agreed points in this plan.

The nominated component parts are also subject to traditional protection mechanisms of the Wixárika that include the clan system and traditional social structures. The Council of Elders and the *maraacames* (shamans) organise and supervise pilgrimages, ritual practices at sacred sites, and intergenerational transmission of spiritual and ecological knowledge. Traditional protection is formally recognised by the Pact of Hauxa Manaka for the Preservation and Development of the Huixárica Culture, signed in 2008 between federal authorities and Wixárika communities.

ICOMOS considers that adequate legal and traditional protection is in place although the effectiveness of these mechanisms faces significant challenges. Implementation and monitoring of these laws have been inconsistent in some areas, and there is a reliance on a high degree of coordination between government authorities (at all three levels) and Indigenous communities.

Management system

The nominated serial property spans several Mexican creating challenges for comprehensive management and protection. This fragmentation can complicate effective coordination between different levels of government and communities, as well as the implementation of coherent and efficient conservation strategies. The management of the nominated serial property involves multiple actors, including local and federal authorities, Indigenous communities and nongovernmental organisations.

In the additional information received in November 2024. the State Party explained that a Management Unit will be established to coordinate the management of the nominated serial property and the implementation of the Integrated Management, Conservation and Safeguarding Plan (2024-2030) (IMCSP). This will include the participation of the Wixárika Regional Council (Consejo Regional Wixárika, CRW), the National Institute of Indigenous Peoples (INPI), and INAH. A protection and monitoring system is in place, managed by the CRW for many of the sacred sites along the route, particularly in locations with higher visitor traffic. Additionally, the nonprofit organisation Conservación Humana A.C, which has worked extensively with Wixárika communities for almost thirty years, provides financial support for watchkeepers at various sites along the route.

The Wixárika have developed their own self-management mechanisms for the protection of their territory and its sacred sites, based on traditional governance structures and community norms.

According to the State Party, the CRW was formally established in 2011 by the Wixárika communities. Its purpose has been to strengthen the protection of the territories and sacred places of the Wixárika, and to support their continued traditional and spiritual practices (including pilgrimages and rituals at sacred sites). In the additional information of February 2025, the State Party clarified that the requirement for a coordinated management mechanism would be met through the continued operation of the CRW, with support from *Conservación Humana A.C* and other NGOs. The CRW maintains consultations and coordination with relevant federal and state institutions. The state centres of the INAH and the INPI also strengthen the coordination and fulfilment of the relevant legal frameworks.

The IMCSP (2024-2030) establishes guidelines for protecting and managing the nominated serial property. This plan was developed in collaboration with the Wixárika communities, federal, state and local authorities, and Conservación Humana A.C, reflecting an inclusive and participatory approach. Each of the Mexican states and municipalities involved in this nomination has plans and strategies that ensure the conservation of biodiversity and areas of cultural importance for Indigenous Peoples. These complement the overarching IMCSP.

In the additional information received in November 2024, the State Party described the holistic and biocultural approach adopted for the development of the IMCSP. A territorial approach has been adopted, giving primary consideration to the human and environmental processes that define these areas. Because of this, most of the sacred sites in their materiality are natural, and their cultural continuity relies on intangible manifestations that grant the territory its cultural value.

The management of the nominated serial property is dependent on the effective participation of Indigenous communities in the decision-making and implementation of these plans. The management strategy establishes some priority areas for management: physical and spiritual conservation of sites associated with the route in accordance with Wixárika practices; and accessibility and safety of pilgrims through infrastructure improvements. The plan establishes the responsibilities of the different governmental entities. The implementation of the IMCSP is dependent on the availability of human and financial resources. The process of preparing the plan included identifying priority areas for conservation, as well as assigning responsibilities to the entities involved.

In the additional information submitted in November 2024, the State Party explained that there are no plans to develop individual management plans for each protected area of the nominated property because the priority is being given to an integrated approach to site management that treats these areas as a single entity. This is largely because the primary stakeholders involved in the conservation and safeguarding of the elements and attributes supporting the proposed Outstanding Universal Value are the Indigenous communities that do not permanently reside in the sacred

sites. Therefore, the management and monitoring of these sites must be carried out in a coordinated manner between the communities and local governments. ICOMOS understands the priority given to the overall management system and management plan, but considers that site-and/or area-specific management plans should be developed and implemented, given the range of conservation issues and diverse management entities involved.

The State Party provided information about the existing management plans for protected areas that contain or overlap with some of the component parts, such as for the Protected Natural Area of Cerro de la Bufa (Zacatecas) and the Protected Natural Area and Sacred Natural Site of Huiricuta and the Historical Cultural Route of the Wixárika People (San Luis Potosí). In addition, the management plan for the Marismas Nacionales Ramsar Site overlaps with component part 19NAY. There is also the Tuapurie Communal Statutes (2000) that establish the internal functioning of the community at Tuapurie. ICOMOS considers that there is a need for more coherent integration between environmental conservation policies and cultural heritage protection, particularly in areas with active mining concessions or private land ownership.

Visitor management

The IMCSP recognises that the effects of unregulated tourism could be devastating for the nominated sites. The collapse of carrying capacity in certain areas has resulted in ecological damage, threatening the environment and the rituals that depend on these territories. Wixárika authorities and other stakeholders have requested that visitor access be strictly regulated, limiting their presence to avoid destruction of the natural and cultural heritage.

The Wixárika communities have maintained a firm stance on controlling tourism in their territories. Similarly, due to their cultural importance and the isolation of most of the sacred sites, it is not considered that most of them are compatible or suitable for tourism development.

Most of the nominated component parts have no visitor infrastructure, although the route is located near to a number of towns and cities that have facilities for visitors, and some centres for interpretation including museums/interpretation centres at San Blas and Real de Catorce, and the Huichol Room at the Zacatecan Museum. The CRW also participates in awareness raising and interpretation activities.

Some of the nominated component parts are already close to established tourism development areas, such as San Blas, Nayarit (19NAY); Zacatecas (06ZAC and 07ZAC); and Real de Catorce, San Luis Potosí (17SLP). Sustainable tourism strategies are being implemented in these areas. The State Party advised that proposed future actions focus on strengthening existing infrastructure and increasing their visibility rather than new large tourism infrastructure projects. In the additional information provided in November 2024, the State Party advised that a

sustainable tourism program will be planned in the medium to long term.

Tourism has been a significant source of income for some Wixárika communities, especially in the states of Nayarit, Jalisco, and San Luis Potosí, where their traditions and art have captured the attention of tourists. The Wixárika have adapted to the tourist market, particularly by selling handcrafts. This has allowed many families to supplement their income, although there are also associated economic inequalities, and problems of appropriation of their culture. Travel agencies and other commercial actors have exploited the image of the Wixárika as guardians of an ancestral heritage. Unregulated exploitation can trivialise cultural and spiritual practices, and the dissemination of information without the consent of the Wixárika can lead to the commercialisation of their heritage, potentially undermining the protection of their cultural rights.

The overexploitation of some natural resources of great importance for Wixárika rituals such as peyote has occurred because some visitors wish to experience psychoactive sensations. This violates traditional cultural norms associated with ritual consumption.

ICOMOS considers that there are several areas where human resources are limited, particularly in the surveillance and maintenance of the access points to the route, which involves continuous and periodic training of people specialised in environmental and cultural matters.

Community involvement

This nomination has been a community-led initiative of the Wixárika communities, supported by INAH and the CONANP. It includes the principal sacred sites and landscapes of the *Tatehuari Huajuyé* that were selected in close collaboration with the Wixárika representatives through workshops organised since 2010 with INAH and *Conservación Humana A.C.* The nomination is a result of consistent petitions from all Wixárika communities. The component parts were selected directly with the communities, led by the Council of Elders of the Tuapurie Community.

Consultation with the Wixárika people for the nomination was organised by the National Commission for the Development of Indigenous Peoples (CDI), currently the INPI. This process started in 2006 and 2007 and was an exercise of reflection and dialogue between the Wixárika communities and federal, state, and municipal authorities to discuss the protection of their sacred sites and the pilgrimage route. In the additional information of February 2025, evidence of consent for the nomination dossier and the management plan was provided by the State Party.

Collaboration with Wixárika people is at the heart of the management of the nominated property and they are the key actors in the creation of the IMCSP. It was developed with the active participation of Wixárika communities who defined the cultural and natural elements to be protected. The plan details the importance of integrating the

communities in managing the sites and guaranteeing the continuity of the intangible cultural heritage linked to the route.

In this context, co-management is essential for the sustainability of the nominated property, as it allows communities to maintain control and empowerment over their cultural heritage and to guarantee the continuity of their rituals. The traditional authorities of the Wixárika, such as the *maraacames* (shamans) actively participate in decision-making regarding the sacred sites.

This nomination is potentially positive for the Wixárika communities. It could generate benefits for the local Indigenous and non-Indigenous populations as well as for the conservation of the associated natural ecosystems. However, it is essential to acknowledge the complex issues and pressures facing this nominated property including social and environmental vulnerability, and serious security concerns due to illegal activities in some areas. In the additional information provided in February 2025, the State Party explained that the National Security Plan of 2014 establishes World Heritage properties in Mexico as priority sites for protection and safety protocols. In this framework, INAH works with the National Guard for the protection of cultural heritage.

In the additional information received in November 2024, the State Party provided examples of community and rural development projects with Wixárika communities including support for traditional buildings techniques and textiles, soil retention around agricultural areas on steep slopes, forestry nurseries and reforestation of pine-oak forests, installation of solar panels and water purification systems in remote settlements, and projects for soil conservation, rainwater harvesting, and training for tour guides.

ICOMOS considers that the inclusion and active participation of the Wixárika in the management and administration processes are a strength of this nomination.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that adequate legal and traditional protection is in place but that the effectiveness of these mechanisms faces significant challenges requiring effective monitoring, cooperation and enforcement of relevant laws. There are areas where mining concessions and land conflicts with private landowners limit effective protection. The management system is appropriate, ensuring that the Wixárika communities maintain control over their cultural heritage. Some elements have yet to be fully established (such as the proposed Management Unit). The agency of the Wixárika in developing this nomination, and the exercise of their cultural rights are a major strength of the nomination, but its long-term success will require resourcing and active cooperation of the three levels of government and the communities across a wide span of territory.

6 Conclusion

The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé) is a serial nomination of twenty component parts that comprise the sacred route to Wirikuta, known to the Wixárika Indigenous Peoples as the Path of Our Grandfather Fire - "Tatehuarí Huajuyé". Each component part is a stage in the journey of the annual pilgrimage, traversing a number of different ecological regions, some of which are important for their biodiversity and other natural values. The route is considered to be an important surviving example of a type of ritual practice which was more prominent within Latin America in pre-Hispanic periods.

Many of the component parts contain multiple sacred sites. In addition to the route itself and its associated intangible cultural heritage, the proposed attributes are frequently elements of the topography or the natural environment, including hills, rocks, mountain peaks, wetlands and water bodies, as well as culturally important plant and animal species. In addition, there are vernacular ceremonial centres, sacred sites, and vernacular buildings. While the route is perceived as a "braid of trails" that has some variations for the different Wixárika communities, the twenty component parts have been selected by the communities themselves, and includes the most significant sacred territories to represent the route. Linked to the ritual pilgrimage are the practical and cosmological elements of the *milpa* system of agriculture.

The State Party has nominated the serial property as an associative cultural landscape, and considers that each of the twenty component parts are associative cultural landscapes as well. While some of the component parts are in themselves associative cultural landscapes, the wide and fragmented expanse of the route across five Mexican states makes it difficult to designate the nominated serial property as a whole as a cultural landscape. ICOMOS considers therefore that the application of the cultural landscape category is not justified, but that the territorial approach adopted for the protection and management of the nominated property is appropriate.

This is an Indigenous-led nomination developed over a number of years. The centrality of the Wixárika communities in all aspects is a commendable key strength of the nomination, and has been further supported by the federal and relevant state governments, including recent decrees to strengthen the rights of Indigenous Peoples and the protection of their sacred sites.

The comparative analysis was improved during the evaluation procedure through exchanges with the State Party, and justifies consideration of the serial nominated property for the World Heritage List. The information provided by the State Party also justifies the serial approach, and the selection of the twenty component parts. ICOMOS considers that the nominated series demonstrates criteria (iii) and (vi), but that criterion (v) has not been demonstrated. The requirements for integrity and

authenticity have been met, and the boundaries are appropriate.

The state of conservation of the nominated component parts is generally good, but is vulnerable to a range of different pressures. The legal protection provided by federal and state governments is adequate, and appropriately recognises the rights of the Wixárika. The management system is appropriate, and the Integrated Management, Conservation and Safeguarding Plan (IMCSP) is in place for the period 2024-2030. However, there are some significant potential pressures on these areas from mining, urbanisation, the uses of private land, and culturally inappropriate tourism, particularly in relation to the consumption of peyote. ICOMOS stresses the need for effective coordination.

ICOMOS appreciates the efforts of the State Party to respond to many questions posed during the evaluation procedure to assist in arriving at an understanding of the nominated serial property.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that the Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé), Mexico, be inscribed on the World Heritage List on the basis of **criteria** (iii) and (vi).

Recommended Statement of Outstanding Universal Value

Brief synthesis

The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé) is a serial property of twenty component parts that span an area across north-central Mexico of more than 500 kilometres, traversing a number of ecological regions, some of which are important for their biodiversity and other natural values. The rituals along the route are practiced in order to maintain relations with the natural elements considered as ancestral deities, to ensure the success of the *milpa* agricultural cycle, and to support the general welfare of the people. Together, the component parts comprise the sacred route to Wirikuta - the Path of Our Grandfather Fire - "Tatehuarí Huajuyé".

The intimate relation of the Wixárika with their territory is expressed throughout the sacred sites and landscapes that occur within the twenty component parts. These express bonds with the worldview of the Wixárika culture, especially with features such as maize, the Golden Eagle, deer, and peyote. The annual pilgrimage involves a sequence of traditional ritual activities that comprise the ceremonial cycles. The property is an exceptional and representative continuing example of the ancestral ceremonial and trade routes that have connected and culturally enriched the peoples of the American continent for millennia.

The attributes of the route include the intangible heritage traditions and practices of the Wixárika, including the veneration of living ancestors in nature, their rich oral tradition passed on through stories, songs, prayers and sacred tales, the ceremonial centres and temples, as well as the crafting of traditional objects. The route is also associated with the *milpa* traditional agricultural and landuse system.

Criterion (iii): The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé) is one of the most representative pre-Columbian routes still in use in the Americas and is an exceptional testimony of the continuing cultural traditions of the Wixárika people. The annual pilgrimages of the Wixárika to Wirikuta and other sacred sites are a clear manifestation of a spiritual tradition, reflecting a specific worldview that connects humans with nature and the sacred realm. The route bears witness to the intimate cultural knowledge that the Wixárika have of these lands, plants and animals.

Criterion (vi): The Huichol Route through Sacred Sites to Huiricuta (Tatehuarí Huajuyé) is an outstanding illustration of the inter-relationship between culture and the natural environment in the spiritual practices of the Wixárika. The sacred sites are imbued with a deep spiritual meaning, representing different elements of the Wixárika worldviews and beliefs. Specific landforms, weather, plants and animals reveal the ancestors, and each component part has specific ritual meaning. Flora and fauna with ritual meaning include tobacco, peyote, deer, and the Golden Eagle. During the travels through this route, elders transmit their knowledge to younger generations through oral traditions, dance, stories, art, music and rituals.

Integrity

This serial property of twenty sites includes the principal sacred sites and landscapes of the Tatehuarí Huajuyé that were selected in close collaboration with Wixárika authorities, and encompasses the necessary attributes that reflect its cultural meaning and historical development. The component parts reflect the sequence of ritual activities performed and stories told by the shamans (*maraacames*) during the annual pilgrimage and ceremonies.

The annual pilgrimage is a central and continuing element of the Wixárika worldview and culture, reaffirming the spiritual bond between the Wixárika people and its sacred territories. The state of conservation of the component parts is generally good, although they are potentially vulnerable due to a range of factors such as extractive mining, instances of restricted access through private property, urban expansion and inappropriate tourism and peyote consumption.

Authenticity

The authenticity of the property is based on the safeguarding of the spiritual practices, the conservation of the natural landscape (including ecosystems, water quality, species and landforms), and the transmission of cultural

traditions within Wixárika communities. The landscapes, ritual practices, vernacular architecture, and artistic expressions reflect the continuity of the Wixárika traditions. The serial property meets the conditions of authenticity based on the safeguarding of both its tangible (form, materials, location) and intangible (language, traditions, spirituality) characteristics. The cultural value of the property is truthfully expressed through the attributes present in its component parts.

Protection and management requirements

The legal protection of the property is provided by a number of state and federal government laws. The National Institute of Anthropology and History (INAH) is the federal agency responsible for the conservation of cultural heritage, and the National Commission for Protected Natural Areas (CONANP) has responsibilities for Nature Conservation Areas. The General Law of Ecological Balance and Environmental Protection (LGEEPA) establishes the framework for the creation and management of Natural Protected Areas, the protection of natural settings of archaeological and historic zones, and areas that are important for indigenous culture and identity. Land-use changes are regulated by the Federal Attorney for Environmental Protection (*Procuraduría Federal de Protección al Ambiente*, PROFEPA).

The legal protection has been further strengthened by the recently adopted Federal Law for the Protection of the Cultural Heritage of Indigenous and Afro-Mexican Peoples and Communities (2023); the Decree amending, adding, and repealing various provisions of Article 2 of the Political Constitution of the United Mexican States Regarding Indigenous and Afro-Mexican Peoples and Communities (2024); and the Decree recognizing, protecting, preserving, and safeguarding the sacred places and pilgrimage routes of the Wixárika, Náayeri, O'dam or Au'dam, and Mexikan Indigenous Peoples, and creating the Presidential Commission for its compliance (2023).

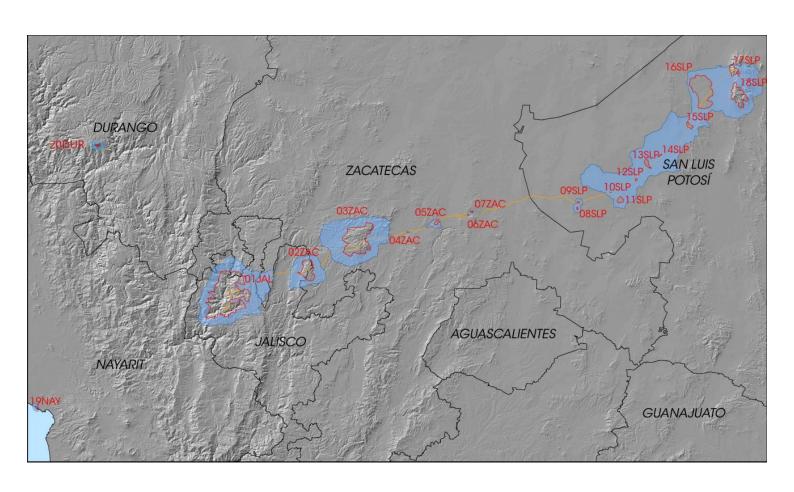
A Management Unit will be established to coordinate the management of the serial property and the implementation of the Integrated Management, Conservation and Safeguarding Plan (2024-2030), which has a biocultural approach. This plan establishes guidelines for protecting and managing the serial property and was developed in collaboration with the Wixárika communities, federal, state and local authorities, and the organisation *Conservación Humana A.C.*, reflecting an inclusive and participatory approach. A protection and monitoring system is in place, managed by the Wixárika Regional Council (*Consejo Regional Wixárika*, CRW).

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Prohibiting mining activities in the component parts and buffer zones, and mitigating the effects of existing extractive mining activities within and around the component parts, buffer zones and wider settings,
- Strengthening regulations to protect the component parts and buffer zones from uncontrolled urban expansion,
- c) Establishing the Management Unit and Site Manager as a priority along with administrative measures and management mechanisms, to ensure the right of way or transit along the pilgrimage route, including both private and public lands,
- d) Developing site- and/or area-specific management plans for the component parts to complement the provisions of the Integrated Management, Conservation and Safeguarding Plan (2024-2030), enabling their particular conservation issues to be addressed.
- e) Developing a sustainable tourism strategy that promotes responsible and culturally appropriate tourism and generates economic benefits for the associated Indigenous communities,
- f) Continuing and further strengthening mechanisms for the participation of the Wixárika in decisionmaking processes and management of the component parts,
- g) Improving the documentation of the component parts (including detailed mapping and photographs), and collaborating with Wixárika communities to develop a detailed map of the network of the route, including primary, and secondary routes where necessary, and indicating associated tangible attributes, in order to improve the understanding of the connections between sacred sites and landscapes for the purposes of protection, effective coordinated management, risk identification, and interpretation,
- h) Developing a research and documentation plan in collaboration with Wixárika communities to deepen knowledge of the cultural and environmental aspects of the route, including archaeological research, a deeper understanding of socio-ecological connections, and the relationship between traditional agricultural practices and natural values (including agrobiodiversity), ensuring that the communities have access to this information as a tool in intergenerational cultural transmission,

- Developing and implementing a Heritage Impact Assessment for development proposals,
- j) Developing effective monitoring mechanisms that are directly based on the identified values of the component parts of the route, including the creation of additional qualitative and quantitative indicators, and capacity building for communities and local organisations,
- k) Providing updated maps and figures for the areas and the number of inhabitants for the overall property and the component parts in light of the addition of the twentieth component part (20DUR) in Durango.



Revised map showing the boundaries of the component parts (February 2025)

III Cultural properties

A Africa

New nomination Nomination deferred by a previous session of the World Heritage Committee

B Arab States

New nomination

C Asia and the Pacific

New nominations

D Europe and North America

New nominations

E Latin America and the Caribbean

New nomination

Nomination deferred by a previous session of the World Heritage Committee

Port Royal (Jamaica) No 1595rev

1 Basic information

Official name as proposed by the State Party

The Archaeological Landscape of 17th Century Port Royal

Location

Town of Port Royal Kingston and St. Andrew Municipal Corporation Parish of Kingston County of Surrey Jamaica

Brief description

The town of Port Royal is situated on a spit of land (Palisadoes) at the mouth of Kingston Harbour in southeastern Jamaica. In 1692, a severe earthquake devastated the town and submerged a large portion of it under water and sand. Today, the vestiges of the terrestrial and underwater elements of Port Royal are exceptional illustrations of an English urban settlement of the 17th century. Its well-protected deep-water port allowed the town to quickly become one of the wealthiest and most significant port cities of the British Empire, and its most important regional and transatlantic trade hub in the Americas for goods - and for enslaved Africans. Surviving vestiges include the remains of six forts that guarded the town, some of which are now underwater, and the archaeological evidence of the ensemble of residential, religious, and administrative buildings of the 17th-century town.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a *site*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2024), paragraph 47, it has also been nominated as a *cultural landscape*.

Included in the Tentative List

2 March 2009 as "The Underwater City of Port Royal"

Background

The World Heritage Committee examined the nomination of Port Royal, Jamaica, at its 12th session (Brasilia, 1988). This nomination consisted of the terrestrial area of Port Royal.

By Decision 12 COM XIV.C:

The Committee recognized the importance of this property for the national heritage of Jamaica but felt that the nomination did not meet the criteria for inscription on the World Heritage List.

In 2012, the State Party received International Assistance under the World Heritage Fund for the preparation of a new nomination that encompassed both underwater and terrestrial parts of the town of Port Royal, which was submitted in 2018.

The World Heritage Committee examined the nomination of the Sunken City of Port Royal – A Relict and Continuing Cultural Landscape, Jamaica, at its 43rd session (Baku, 2019):

The World Heritage Committee,

- Having examined Documents WHC/19/43.COM/8B and WHC/19/43.COM/INF.8B1.
- Defers the examination of the nomination of The Sunken
 City of Port Royal A Relict and Continuing Cultural
 Landscape, Jamaica, to the World Heritage List in order to
 allow the State Party, with the advice of ICOMOS and the
 World Heritage Centre, if requested, to:
 - Consider the site as a single entity and a relict archaeological landscape which include all the attributes related to 17th century archaeological vestiges, both underwater and terrestrial, of the town destroyed by the 1692 earthquake,
 - Revise the justification of Outstanding Universal Value accordingly, and clearly define the attributes, particularly in the terrestrial part,
 - Adjust the boundaries to cover the whole pre-1692 town, as the current proposal cuts out one section due to civil settlement and another area is occupied by a coast guard,
 - Extend the protection of the terrestrial part to include the linear vestiges of the 1692 town as well as all relevant archaeological areas,
 - e) Suspend work on the proposed cruise ship pier and proposed visitor centre until detailed Heritage Impact Assessments have been undertaken for both and submitted to ICOMOS for review.
 - f) Prepare a revised or new Heritage Impact Assessment for the proposed cruise ship pier that considers both direct and indirect impacts on the nominated property from cruise ships; this should be based on a detailed analysis of possible cruise ship movements that go beyond the simple red line so far proposed; takes account of all weathers and types of ships and is guided by appropriate technical expertise,
 - g) Prepare a Heritage Impact Assessment for the proposed visitor centre that is based on a detailed analysis of visitor numbers and visitor flows and analyses both direct and indirect impact on the nominated property and its setting,
 - h) Strengthen the protective legal instruments to quide the tourism development process.
 - Ensure the availability of human and financial resources to properly implement the actions described in the management plan,
 - Ensure articulation and complementarity among the different managerial instruments,
 - k) Elaborate and implement a disaster management and risk preparedness plan;
- Considers that any revised nomination should be considered by an expert mission to the site;

- Recommends that the State Party give consideration to the following:
 - Completing a comprehensive and detailed inventory of terrestrial and submerged cultural resources relating to the 1692 town,
 - Ensuring that the conservation and protection of the underwater archaeological remains are guided by the principles for protection set out in the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage;
- Also recommends that the State Party invite an ICOMOS advisory mission to the site to provide advice in relation to Heritage Impact Assessments for underwater cultural heritage;
- 6. <u>Further recommends</u> that the State Party considers changing the name of the proposed property, as the "Sunken City" denomination refers only to a part of the nominated property and the references to relict and continuing cultural landscape should not be used in the title of a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural values of this nominated property, their conservation and their management were received from IUCN in mars 2025 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 18 to 23 August 2024.

Additional information received by ICOMOS

A letter was sent to the State Party on 27 September 2024 requesting further information about the boundaries and 17th-century remains, conservation, development and other factors affecting the nominated property, risk preparedness, protection and management documents, storage and presentation of artefacts from Port Royal, site interpretation, and monitoring.

Additional information was received from the State Party on 7 November 2024.

An interim report was provided to the State Party on 19 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the interim report on the use of criterion (vi), research plan, conservation, tourism management plan, participation, and size of the nominated area.

Additional information was received from the State Party on 27 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report 12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

Description and history

The town of Port Royal is situated in south-eastern Jamaica on a long, narrow spit (Palisadoes) that marks the entrance to and protects Kingston Harbour, one of the largest natural harbours in the world. A severe earthquake devastated the settlement in 1692 and submerged a large portion of it under water and sand.

The nominated property includes both the submerged and terrestrial archaeological vestiges of 17th-century Port Royal. The marine part of the relict archaeological landscape has been surveyed, but only a small section of it has been excavated and investigated. Besides the street pattern, it contains the remains of street pavements and the vestiges of numerous houses, fortifications, a tavern, a warehouse, fish and meat markets, and walls. The remains of Fort Rupert, a component of the original defence system, lie submerged in a lagoon. Numerous artefacts that illustrate the earliest period of the history of the town have been found in this area and have been documented, conserved, and stored.

The terrestrial part, which encompasses the historic district of the town, has a few above-ground remains of the pre-1692 town, as well as buildings, structures, and sites corresponding to later periods. The main aboveground terrestrial architectural structure is Fort Charles, constructed from 1656 onwards and remodelled and restored several times after hurricanes. It was the only fortification still standing after the 1692 earthquake. The foundations of St. Paul's Church, some two metres below the current ground level, are also a testimony to the first period of the history of the town. Chocolata Hole was a shallow bay bordered by a quay used by fishers. Excavations there have revealed the original quayside construction of closely spaced round wooden piles. Lime Street, which was the main artery of the pre-1692 town, is located under a playing field but continues to the sunken part of town where it is well preserved as an underwater archaeological feature.

The nominated property has an area of 27.00 ha, and a buffer zone of 292.27 ha.

The earliest inhabitants of the region were the Taínos, from whom several artefacts have been retrieved in underwater explorations. Once England captured Jamaica from Spain in 1655, a fort (later named Fort Charles) was constructed at the end of the sand spit. It marked the origin of the town named Port Royal in 1660. Its location in the Caribbean and the nature of the site, suitable to anchor ships in the bay and close to the coast, allowed the town to become an important port and trade entrepôt of the British Empire within a few years. The town

was protected by a defensive system that included six forts and a wall that marked its boundaries. During this period of its history Port Royal played a significant role in the British Empire and in the Caribbean. It was the point of debarkation for enslaved Africans and a place for pirates and privateers, all of which made Port Royal one of the richest cities in the region.

After the 1692 earthquake, the part of the town remaining above ground was rebuilt, mainly of wood. It was again partially destroyed in 1703, this time by fire. At the beginning of the 18th century, the economy of the island grew based on sugar production. At the same time, an increase in British naval power saw Port Royal become an important naval base, especially after a dockyard was developed between 1715 and 1763. At the beginning of the 20th century, the focus of British sea power shifted with the development of a powerful fleet of steam warships based at dockyards in Britain and the Mediterranean. The naval dockyard at Port Royal was closed in 1905, and little of it remains.

The 1907 earthquake that destroyed much of neighbouring Kingston caused only minor damage in Port Royal. However, in 1951 Hurricane Charlie swept through, leaving only a few buildings of the historic part of the town intact. Currently, Port Royal is a fishing village with a population of some 2,000 inhabitants and serves as the base for the Jamaica Defence Force Coast Guard.

State of conservation

Fort Charles, constructed of brick and stone, is the most complete and best-preserved structure. It sank more than one metre during the 1692 earthquake, and was drastically remodelled in the following years. Restoration work has been completed over the centuries to maintain the fort. In the 1960s and 1970s, cement was used on walls and floors as a bonding and rendering material. In 2009, the State Party, through the Jamaica National Heritage Trust (JNHT), carried out rehabilitation works whereby the cement was removed and replaced with lime mortar. The current state of conservation of Fort Charles is very good.

Morgan's Line battery wall, constructed in 1680, was partially painted as a community beautification project. The additional information submitted by the State Party in November 2024 clarified that the paint has been removed and the state of conservation is now considered to be good. Restorations and reconstructions of Fort Walker and the Hanover Line fortification are easily discernible from the original.

Excavations at St. Paul's Church have revealed the excellent condition of organic materials. The additional information provided by the State Party in November 2024 indicated that approximately 3.6 tonnes of wood, including decorated carvings, complete pews, and floorboards, have been recovered.

The terrestrial street pattern of modern Port Royal has retained its original layout, though now overlaid with asphalt.

The earthquake that destroyed Port Royal in 1692 caused two thirds of the town to be submerged. Part of this submerged area was located in shallow waters and reclaimed in the process of reconstruction during the 18th and 19th centuries, when sand, stones and brick were deposited in these areas to extend the available land. The State Party supplied additional information on this process in November 2024, providing a map indicating the shoal water area. However, it remains unclear exactly which areas where "reclaimed". No geophysical investigation seems to have been carried out to identify the remains underneath the landfill.

In the deep-water areas, photogrammetry (digital 3D recording) undertaken in 2022 during an Underwater Cultural Heritage Risk Assessment clearly demonstrates the high level of conservation of the remains previously excavated between 1981 and 1990 by Texas A&M University in cooperation with the Institute of Nautical Archaeology and the JNHT. Additionally, an October 2021 underwater survey revealed that the remains of Fort James, previously thought to be destroyed, are intact and generally covered by a thick layer of sediments, ensuring the preservation of its primary context.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the terrestrial contexts, comprised of historical monuments and sub-surface archaeological assets, as well as the underwater remains of the nominated property are generally good.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are development pressures and environmental pressures, especially earthquakes and hurricanes.

The Sustainable Port Royal Concept Plan (2019), which is now superseded by the Port Royal Master Plan (2024, included in the 2025 additional information supplied by the State Party) was prepared by the Urban Development Corporation for the Ministry of Economic Growth and Job Creation. The plans seek to transform the area into a world-class destination while maintaining its historical and environmental integrity. The plan envisions a thriving, mixed-use site that integrates tourism, residential areas, commercial activities, and infrastructure improvements. While the objective of the State Party is to create economic growth for the Port Royal community, it recognises that the historic fabric of the site makes it attractive to both local and international visitors. The State Party indicates that any planned development project is assessed by the JNHT, and is limited by the existing legal and management framework. Environmental and Heritage Impact Assessments are conducted in order to avoid damage to the natural or cultural heritage.

In 2019, a floating cruise ship pier and related facilities at the Old Coal Wharf outside the nominated property were approved and subsequently built. Based on the recommendation of the World Heritage Committee, an Underwater Cultural Heritage Risk Assessment was conducted between 2021 and 2022 to assess potential risks to the underwater archaeological site by cruise ships and their movements. This assessment, which was conducted by an international team, indicated that the impact of waves, propeller wash, and side-thruster wash from cruise ships would be negligible. Furthermore, all cargo and cruise ships entering and exiting the Kingston and Port Royal Harbours are navigated by an authorised pilot of the Port Authority of Jamaica. Pollutants from the port and the town pose a medium but manageable risk to the underwater archaeological site. The 2024 Port Royal Master Plan mentions the installation of a "new Cruise Ship Port" (p. 5) for ships with up to 3,000 passengers.

The State Party considers that tourism overcrowding is not an issue at the moment. Most visitors to Port Royal in the post-COVID-19 era arrive by cruise ship. According to the additional information supplied by the State Party in November 2024, a study commissioned by the Urban Development Corporation indicates that Port Royal has a carrying capacity of 6,911 visitors. It is expected that these visitors would not all be in town at the same time, but would be distributed throughout the day and across different sites in Port Royal and beyond. The study also indicates that the impact of visitors on the heritage values needs to be monitored constantly in order to make adjustments as may be required.

The fishing techniques of local fishers include practices that may have a negative impact on underwater archaeological resources. The additional information provided by the State Party in November 2024 indicates that no vessels are allowed to anchor in the Port Royal Underwater City Area without prior permission from the JNHT, and no fishing may be done there. The Coast Guard patrols this sensitive heritage area.

Natural disasters, including earthquakes, hurricanes, and fires, have nearly destroyed the town on several occasions. Archaeological investigations and photogrammetric assessments have shown that storms have not negatively affected the submerged contexts of the nominated property.

A sea wall built in the 19th century protects the 17th-century streets of Port Royal from erosion caused by storm surges. There are plans for the rehabilitation of this wall in a section that has been compromised.

Earthquakes are the most serious natural threat for Port Royal. An added danger is that the nature of the soil in the area makes it susceptible to the process of liquefaction (some additional information on this subject was supplied by the State Party in February 2025). The JNHT, with guidance and assistance from the Office of Disaster Preparedness and Emergency Management, has drafted the Port Royal & Palisadoes Disaster Risk Management

Plan 2022-2026. The State Party indicated that the Plan would be finalised by the end of 2024.

ICOMOS notes that the history of the nominated property highlights the seriousness of the threats to which it is exposed. ICOMOS considers that the State Party has taken adequate measures to control these factors where possible or to mitigate their potential impacts. Continuous and careful monitoring of the condition of the nominated property will be necessary. The draft Disaster Risk Management Plan should be approved as soon as possible.

ICOMOS considers that the state of conservation is good and that factors affecting the nominated property are being addressed adequately.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- Port Royal is an exceptional testimony of an English settlement in the Western Hemisphere. It provides a complete illustration of an English urban settlement between 1655 and 1692. This archaeological landscape, partly underwater, partly underground, and partly above ground, is in a state of conservation that is unrivalled.
- Strategically located in the centre of the Spanish Main, Port Royal became a major trans-shipment point at a time of intense European rivalry in the New World.
- The nominated property stands out as a site of memory representing the most important English colonial entry point for Africans who were forcibly transported to the New World in the 17th century.

The property has been nominated as a cultural landscape. ICOMOS considers that the interaction between nature and humans is not discussed by the State Party in any detail, and considers that the influence of the natural conditions of the site on the urban structure and morphology cannot be seen as a cause for exceptionality, since this is the case in many, if not most, towns and cities in the world. The State Party has not explained how human actions shaped the natural environment to create a cultural landscape, nor is the inter-relationship between culture and nature described. ICOMOS considers that the cultural landscape denomination is not warranted.

ICOMOS therefore recommends that the name of the nominated property be changed to: "The Archaeological Ensemble of 17th Century Port Royal".

Based on the nomination dossier, and according to the State Party, the key attributes of the proposed Outstanding Universal Value can be grouped as follows:

Terrestrial elements, including the urban layout and street pattern, the fortifications and remains of Fort Charles, Morgan's Line/Fort Morgan, Fort Walker and Fort Carlisle, Chocolata Hole lagoon, the remains of St. Paul's Anglican Church, and terrestrial archaeological excavations.

Underwater elements, including the ruins and artefacts of Fort James, Fort Carlisle, Fort Rupert, Thames Street, Fishers' Row, Queen Street, Lime Street, Littleton's Tavern, the Kings Warehouse, fish and meat markets, houses, and the underwater evidence of other 17th-century buildings and structures.

Attributes mentioned in connection with the nominated property as a "place of memory" are broadly described as the architectural landscape constructed by enslaved persons, especially some of the fortifications (Fort James and Fort Carlisle), artefacts these persons might have made or used such as red clay smoking pipes, as well as the site itself, seen by the State Party as the graveyard for those who perished in the devastating earthquake of 1692, including many Africans. In the additional information supplied in February 2025 the State Party highlighted the transfer of techniques / skillsets of the enslaved Africans without offering details concerning the direction or the modality of this transfer. Furthermore, the State Party supplied more examples of the type of work the enslaved Africans had to do during the 17th, 18th and 19th centuries.

Comparative analysis

The comparative analysis has been developed within a chronological and typological framework. The following parameters can be inferred: colonial settlements reflecting the early stage of European expansion into the Western Hemisphere; colonial settlements having an advantageous geographical position from a military and economic point of view; and colonial settlements with well-conserved archaeological contexts. It has examined properties throughout the world inscribed on the World Heritage List, included in the Tentative Lists of States Parties, as well as other properties.

Based on its urban layout, Port Royal, with its roughly triangular urban pattern, is likened to London (United Kingdom) after the Great Fire of 1666 and the post-fire Rebuilding Act of 1667 in terms of dimensions and regularity of the network of streets and alleys. Earlier English settlements in the region such as St. George, Bermuda (1612), and Bridgetown, Barbados (1628), are described as being more akin to English market towns, which were characterised by narrow streets with lesser symmetry, order, and proportion in their geometric forms. Port Royal is also contrasted with later English cities such as Kingston, Jamaica, which was built on an orthogonal grid pattern after the 1692 Port Royal earthquake.

Spanish fortified port cities such as the Historic Fortified Town of Campeche (Mexico, 1999, criteria (ii) and (iv)), the Port, Fortresses and Group of Monuments, Cartagena (Colombia, 1984, criteria (iv) and (vi)), and the Archaeological Site of Panamá Viejo and Historic District of

Panamá (Panama, 1997, 2003, criteria (ii), (iv) and (vi)) all offer important information on Spanish fortified cities and town planning in the region, but are not considered by the State Party to be fully comparable colonial endeavours.

Farther afield, Jamestown and Boston in the United States of America were also important 17th-century English seaports. However, their commercial activity was dwarfed by that of Port Royal, as represented by the number of merchants in town and ships coming into port. Port Royal experienced faster growth fueled initially by plunder, but above all to contraband trade and the trade in enslaved Africans, to become the main economic English base in the hemisphere during the 17th century.

None of the above properties offer better preserved archaeological contexts, able to show a "snapshot" of a 17th-century English colonial town in the Americas. The State Party highlights that the nominated property's archaeological vestiges provide a "time capsule" of this important stage in human history.

The State Party separates the nominated property as a "site of memory" from the above comparisons. It contends that Port Royal stands out as a site of memory representing the most important English colonial entry and exit point for Africans who were forcibly transported to the New World in the 17th century. Comparisons in this context are made with Historic Bridgetown and its Garrison (Barbados, 2011. criteria (ii), (iii) and (iv)), Valongo Wharf Archaeological Site (Brazil, 2017, criterion (vi)), Island of Gorée (Senegal, 1978, criterion (vi)), Forts and Castles, Volta, Greater Accra, Central and Western Regions (Ghana, 1979, criterion (vi)), and Cidade Velha. Historic Centre of Ribeira Grande (Cabo Verde, 2009, criteria (ii), (iii) and (vi)). The State Party points out that, in contrast to most of the above properties, Port Royal did not have a tangible slave market. It furthermore states that the nominated property complements other sites of memory while standing out due to its time period and its function as a major trans-shipment hub.

ICOMOS considers that the nominated property has been demonstrated to stand out among its comparators, as a well-conserved site that reflects the early stage of European, and particularly English, expansion into the Western Hemisphere and its colonisation.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of criteria (iv) and (vi).

Criterion (iv): be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates a significant stage in human history:

This criterion is justified by the State Party on the grounds that the nominated property is an exceptional illustration of an early English colonial settlement during the period of European expansion and rivalry, which is a significant stage in the history of the Americas. With its deep natural harbour and strategic location in the centre of the Spanish Main, Port Royal developed in just thirty-seven years from a colonial frontier settlement to a pivotal 17th-century port town, documented as the most important English settlement in the Western Hemisphere. The global network of trade that converged here is reflected in the rich volume of recovered artefacts from as far away as Asia and Europe. The state of conservation and completeness of the town's original urban layout and archaeological evidence, both terrestrial and underwater, is exceptional, according to the State Party.

ICOMOS considers that the ensemble of sunken remains and surviving 17th-century town layout and structures on land illustrate a key stage in the development and history of Jamaica and a key stage in English exploitation of the New World. In the late 17th century it was the largest and most economically important English settlement in the Americas.

ICOMOS considers that this criterion is demonstrated.

Criterion (vi): be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding universal significance;

This criterion is justified by the State Party on the grounds that Port Royal exemplifies England's forceful expansion of their role in the trafficking of enslaved Africans to the Americas. The fortifications and infrastructure are said to be tangible evidence of the contribution of enslaved Africans to the legendary rise, growth, and sustainability of Port Royal, as well as to the transfer of knowledge and skills. Between 1651 and 1700, 116,639 persons from Africa who were forcibly consigned to slavery arrived at Port Royal; from there, most were sold to Spanish colonies.

It was the labour and skilled workmanship of enslaved people that built the architectural landscape of Port Royal, contends the State Party in the additional information it submitted in November 2024: as many as 500 enslaved Africans at a time were engaged in the construction of Fort Carlisle in 1682, for example. Archaeological evidence of the enslaved in Port Royal is also seen in artefacts such as red clay smoking pipes retrieved from both terrestrial and marine contexts. The 1692 earthquake resulted in the loss of life of many of the enslaved persons, making the

nominated property a grave site, not only for the merchants and the wealthy, but also for the poor and enslaved, according to the State Party.

ICOMOS considers that the transatlantic trade of enslaved Africans is consequential to the economic importance Port Royal achieved, especially before the 1692 earthquake. The accessibility of Port Royal for most Spanish territories helped to promote the transfer of Spanish operations from Dutch controlled Curaçao to Port Royal. Furthermore, it was estimated that at the time of the earthquake more than one third of the population of Port Royal were enslaved Africans. While there are no main attributes that can be directly tied to the enslaved persons, their presence and their work is expressed in the built environment. The nominated property is an important place of memory.

ICOMOS considers that this criterion is demonstrated.

ICOMOS concurs with the identification of the proposed attributes by the State Party. They are considered to convey the proposed Outstanding Universal Value of the nominated property.

ICOMOS considers that the nominated property meets criteria (iv) and (vi).

Integrity and authenticity

Integrity

The integrity of the nominated property is based on the terrestrial and underwater evidence of the 17th-century town of Port Royal. The relict archaeological landscape contains all the attributes necessary to convey the proposed Outstanding Universal Value, including the entire town encircled by the six fortifications present at the time of the devastating earthquake in 1692, and its 17th-century urban plan.

Integrity is also a measure of the intactness of the attributes. Although there are only a few standing structures from pre-earthquake Port Royal remaining today, due to numerous natural and human-caused disasters, new buildings have followed the intent and alignment of the 17th-century layout of the town, preserving the foundations of pre-1692 Port Royal. The archaeological remains of pre-1692 Port Royal are well preserved. The underwater sections of the town are exceptionally well preserved under layers of sediments. Photogrammetry recordings in 2021 have shown that the buildings excavated in the 1980s are in good condition. So far, less than ten percent of the site has been explored. Major pressures on these attributes are being managed adequately.

ICOMOS confirms that the integrity of the nominated property can be considered to be high. The potential for future archaeological investigations of 17th-century Port Royal is exceptional, due to the sealed archaeological context, especially in the submerged part of the nominated property, which effectively forms a "time capsule".

ICOMOS considers that the integrity of the nominated property has been demonstrated.

Authenticity

The authenticity of the nominated property is based on its location and setting, its forms and designs, its materials and substances, and its uses and functions.

The nominated property is in its original maritime location, and though its setting has evolved, it remains evocative of its past vocations. The forms, designs, materials, and substances of its urban plan and the terrestrial and underwater archaeological evidence of its 17th-century past remain largely intact and legible. Fort Charles, for example, has undergone several restorations over time, but its materials and design can be considered largely intact. Underwater features are completely unchanged and have been preserved in situ; their authenticity is unquestionable. In terms of uses and functions, the nominated property continues to play an important role in the maritime activities of the Kingston and Port Royal harbours.

ICOMOS considers that the authenticity of the nominated property has been demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the nominated property have been met

Boundaries

There are approximately 1,500 persons living in the nominated property and buffer zone area (2011).

The boundaries of the nominated property are defined by the pre-1692 footprint of Port Royal, encompassing both the current underwater and terrestrial archaeological contexts. The terrestrial part includes the linear vestiges of the 1692 town alongside all other relevant archaeological areas. The catastrophic earthquake of 1692 changed the outline of the spit and submerged portions of the north-western edge of the town. Over time, other areas that are now solid ground were incorporated, particularly to the southeast of the urban area. The additional information supplied by the State Party in 2024 clarified the delineation of the pre- and post-earthquake shorelines.

The selection of the area to be nominated is logical and scientific in terms of encompassing the attributes of the proposed Outstanding Universal Value, and this underlying rationale has been applied appropriately and consistently.

The buffer zone completely surrounds the nominated property and comprises a total of 292.27 hectares. The boundaries of the buffer zone follow the shoreline of the spit on which the nominated property is located (to the north) and connect several beacons (to the south and west) and the Pelican Spit (to the northwest). They contain terrestrial urban and natural areas, as well as marine areas. The

buffer zone provides an additional layer of protection to the nominated property by providing complementary restrictions on its use and development.

ICOMOS considers that the boundaries of both the nominated property and the buffer zone are adequate.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies consideration of the nominated property for the World Heritage List. The ensemble of sunken remains and surviving 17th-century town layout and structures on land illustrate a key stage in the English exploitation of the New World and thus justify criterion (iv). In the 17th century, Port Royal played a pivotal role in the transatlantic trade of enslaved persons. The labour and skilled workmanship of these enslaved Africans is expressed in the built architectural ensemble of Port Royal and justifies criterion (vi). Integrity and authenticity of the nominated property have been demonstrated, and its boundaries and buffer zone are considered adequate. Its categorisation as a cultural landscape is not justified.

4 Conservation measures and monitoring

Documentation

Historic accounts describe 17th-century Port Royal and its destruction in detail, and the nomination does integrate this background information. Large amounts of information and documentation have been generated during various archaeological explorations, excavations, and surveys. A list of around forty activities, spanning 162 years from 1859 to 2021, summarises past research activities. While some documentation seems to exist for all of them, it is unclear how much of this documentation is properly archived, evaluated, and available.

A table in the nomination dossier titled "Inventory of terrestrial and submerged cultural resources relating to the 1692 town" offers very basic information on the six fortifications, the individual streets identified of the 17th-century town, Chocolata Hole, St. Paul's Anglican Church, and five individual buildings that were explored along Lime and Queen Streets. It is unclear what level of detail this inventory has, beyond the basic facts mentioned in the table.

Inventories also include an "Inventory of Port Royal Artefacts" (2017), which is held by the Jamaica National Heritage Trust (JNHT) and the Institute of Jamaica (IOJ). Large amounts of investigation and documentation seem to be available, but do not seem to be centrally held, systematically archived or integrated into a general, accessible research context, which could include databases and a Geographic Information System (GIS).

The documentation of the submerged part of Port Royal was improved in October 2021 through photogrammetry work done as part of the Port Royal Heritage Impact Assessment. While impressive, the individual images do

not seem to be included in a complete 3D coverage of the remains of 17th-century Port Royal.

A research plan for Port Royal has been conceptualised but not yet formalised, as declared by the State Party in the February 2025 additional information. The State Party also supplied a three-year action plan for research activities. Many of these activities will be executed by the JNHT in collaboration with national and international partners. Outside organisations have to apply for a research permit and comply with conditions set out in national guidelines, the contract and terms of reference.

Some artefacts are displayed at the National Museum of Jamaica, stored at the museum or in the JNHT building or held by the IOJ. In all cases, the artefacts are considered to be stored or exhibited adequately. It is unclear whether these are all the artefacts resulting from the many excavations.

ICOMOS considers that, overall, the documentation of the nominated property is adequate. However, centralising and systematising the documentation is urgently needed. More visibility should also be given to the artefacts recovered from the nominated property, ideally in a museum dedicated specifically to Port Royal. Based on the work already done, it is necessary to finalise the research plan.

Conservation measures

No specific conservation efforts have been implemented for the submerged portion of the site. However, the underwater conditions help preserve the remains. The artefacts recovered from the underwater archaeological site have been adequately documented, preserved, and stored.

Limited conservation work has been carried out on the terrestrial portion. However, conservation work at Fort Charles has focused on removing cement, which was used in previous interventions, and replacing it with lime mortar. Several nautical elements such as cannons and anchors are used as ornamental elements within the nominated property. Most of them are not from pre-earthquake Port Royal. In the additional information supplied in February 2025 the State Party presented the investigation and conservation work already done on these elements.

The archaeological vestiges of Michelin Avenue, Fort Morgan, and the remains of St. Paul's Anglican Church are to be the subjects of future restoration projects. For Fort Rupert, currently located in a mangrove area protected under the Natural Resources Conservation Authority (NRCA) Act of 1991, the State Party provided additional information in February 2025, stating that no immediate plans for further archaeological investigation exist, due to the difficult access and the relative stability of the remains.

ICOMOS considers that the State Party should contemplate developing and implementing a conservation plan that employs locally trained specialists, thereby fostering local expertise in conservation.

Monitoring

The JNHT is responsible for monitoring the terrestrial and underwater cultural heritage of the nominated property. This includes the assessment, documentation, and study of all heritage assets that are located above ground, below ground, and underwater within the protected area. Eleven key monitoring indicators have been developed.

In November 2024 the State Party provided additional information on the issue of monitoring. The JNHT and the National Environment and Planning Agency conduct weekly patrols and monitoring of the nominated property and wider protected area. A team comprised of the JNHT, the National Environment and Planning Agency, and the Jamaica Defence Force Coast Guard conducts at least five monitoring dives annually.

Regarding terrestrial heritage resources, weekly site visits are made by the Estate Management Division and reports are generated and submitted to the Heritage Development Review Committee, a sub-committee of the Board of Trustees of the JNHT. Reports are stored in JNHT databases. The University of the West Indies' Port Royal Marine Laboratory also performs a monitoring role for the marine ecosystems.

The State Party has indicated that future monitoring exercises will engage greater use of photogrammetry and incorporate underwater drones.

The key indicators proposed by the State Party are very general (for example, "Condition of Cultural and Natural Heritage"). More specific indicators are needed, especially those that identify the state of conservation in quantitative terms and can be used as baseline data for protection, conservation, interpretation, and management. The inclusion of new technologies and different stakeholders with a variety of areas of expertise in the monitoring process is commendable, but the generated information has to be centralised and stored in the framework of a well-structured monitoring system in order to be useful in the future.

ICOMOS considers that the documentation is adequate, but should be centrally held and systematically archived. It is also suggested that more visibility be given to the artefacts recovered from the nominated property. A general research plan with clear objectives should be developed, and a conservation plan that employs locally trained specialists could be contemplated. More specific key monitoring indicators are needed, to be used as baseline data. ICOMOS considers that it would be advisable that the monitoring system is further developed to encompass all the attributes of proposed Outstanding Universal Value and adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

Port Royal and Palisadoes were designated in 1999 as Protected National Heritage under the Jamaica National Heritage Trust Act of 1985. This designation ensures the protection of all cultural heritage resources, whether above or below the land surface or seafloor, within the nominated property and its buffer zone. Additionally, Fort Charles had individually been declared a National Monument in 1992.

A primary responsibility of the Jamaica National Heritage Trust (JNHT), a cultural agency under the Government of Jamaica operating within the Ministry of Culture, Gender, Entertainment and Sport, is to safeguard national monuments and any sites designated as Protected National Heritage. It shares jurisdiction for regulatory and enforcement responsibilities with the National Environment and Planning Agency under the Natural Resources Conservation Authority Act of 1991. Under this Act, the Palisadoes-Port Royal Protected Area was officially established in 1998. Managed by the National Environment and Planning Agency, the Palisadoes-Port Royal Protected Area focuses on the conservation, protection, and sustainable use of its natural resources. In 2005, the area was further recognised as a Wetland of International Importance (Ramsar Site). The Palisadoes-Port Royal Protected Area covers approximately 7,523.08 hectares, encompassing cays, shoals, mangrove lagoons, mangrove islands, coral reefs, seagrass beds, and surrounding shallow waters, making it significantly larger than the nominated property.

Other national legislation providing regulatory support includes the Town and Country Planning Act of 1957, the Endangered Species (Protection, Conservation and Regulation of Trade) Act of 2000, the Wildlife Protection Act of 1945, the Shipping Act of 2002, the National Solid Waste Act of 2001, the Beach Control Act of 1956, and the Public Health Act of 1976.

In 2011 the State Party ratified the UNESCO Convention on the Protection of the Underwater Cultural Heritage. The State Party highlights that this has enabled it to build capacity and access a strong global network of experts committed to assisting in the management and protection of the nominated property.

These mechanisms provide an effective legal and institutional basis for the protection of the nominated property and ensure that the attributes of the proposed Outstanding Universal Value are adequately safeguarded.

Management system

The main instrument created by the JNHT for the management of the nominated property is the Port Royal & the Palisadoes Management Plan 2022-2027. The Management Plan aims to meet the present and future management needs of the nominated property, to identify all relevant government agencies and stakeholders that play a fundamental role in overseeing sustainable conservation and use of the site, and to coordinate the

many interested bodies, groups and individuals. It furthermore identifies a number of issues affecting Port Royal that have to be monitored or addressed, ranging from controlling stray animals to managing the effects of climate change. The plan was approved on 30 October 2024 and has been operationalised through the JNHT and other key agencies. In addition, the Port Royal and Palisadoes Preservation Scheme (2024) provides development guidelines for the protected area. Any person who contravenes the provisions of the Scheme, commits an offence and is liable to penalty or fees imposed in accordance with the JNHT Act 1985.

The JNHT, assisted by the Office of Disaster Preparedness and Emergency Management, has drafted the Port Royal & Palisadoes Disaster Risk Management Plan 2022-2026, which was intended to be approved at the end of 2024.

The National Environment and Planning Agency is the lead implementing agency in the maintenance and protection of the natural resources of the site. It has drafted a ten-year management plan for the Palisadoes-Port Royal Protected Area. The Final Draft Palisadoes-Port Royal Protected Area Management Plan 2021-2031 serves as a guide for the management of the critical resources and resource uses of the Protected Area. It clearly indicates that an Environmental Impact Assessment and an Archaeological Impact Assessment are pre-requisites for all development within the protected area. This includes the construction of new structures as well as the expansion of existing facilities, which ultimately must be approved by the JNHT, among other government bodies.

The Revised Draft Zoning Plan for the Palisadoes-Port Royal Protected Area (2014-2019) is another planning tool related to the municipality and region in which the nominated property is located. No information is provided on an updated zoning plan.

To oversee the management and conservation of the Port Royal and Palisadoes Protected Area a co-management Committee was formed with key stakeholders. The committee meets on a trimestral basis in order to discuss management issues of the protected area. The Boards of the JNHT and the Natural Resources Conservation Authority act in an advisory capacity for the management of the nominated property. These Boards develop policy guidance and liaise with the Ministry of Culture, Gender, Entertainment and Sport and the Ministry of Economic Growth and Job Creation.

The management of the nominated property is being financed by governmental, non-governmental, and bilateral arrangements. The management of the cultural resources is financed from the income generated from the lease of Fort Charles to the Port Authority of Jamaica. The latter is responsible for the maintenance of Fort Charles, under the guidance of the JNHT.

The nominated property is managed by the JNHT and has over 30 technical and administrative support staff.

The State Party describes the management of the nominated property as a collaborative process among community, governmental, and non-governmental organisations. In the additional information provided in February 2025 the State Party indicates that several residents and organizations of the Port Royal community (including the Port Royal Community Development Committee, the Port Royal Brotherhood and the Port Royal Fisherfolk Friendly Society) are active members of the Palisadoes-Port Royal Protected Area Management Committee (PPRPAMC); other community members work for the JNHT.

Visitor management

Since January 2020, most visitors to Port Royal arrive via cruise ships, with many transported directly to Kingston and surrounding areas. Others disembark the vessels and visit Fort Charles, the main attraction of the town. The State Party observes that, even with big cruise ships (up to 1,420 passengers), overcrowding in Port Royal is not an issue. Currently, a maximum of three cruise ships per week are expected. Visitors disembark for an average stay of two to four hours and many do not stay in Port Royal but visit the Kingston metropolitan area.

Several plans exist to develop Port Royal into a sustainable tourism attraction. In the additional information provided in November 2024, the State Party clarified that development proposals dated 1993 and 2005 were concept plans that were never approved for implementation, and a development proposal dated 2009, though commissioned by the JNHT, was not implemented due to financial constraints. The latest Sustainable Port Royal Concept Plan (2019), was developed as part of a joint governmental initiative and revives some of the ideas of previous plans such as housing designs, museum development, and infrastructure works. The plan aims to convert Port Royal into a world-class heritage, environmental, and cultural attraction. In the additional information supplied in February 2025 the State Party indicated that the Sustainable Port Royal Concept Plan was superseded by the Port Royal Master Plan for Development (2024), elaborated by the Urban Development Corporation for the Ministry of Economic Growth and Job Creation.

Currently, the nominated property is served by a number of private and public visitor facilities that include restrooms and parking facilities. Storyboards and directional signs are present throughout the town, and additional interpretive materials are being planned for the significant historical and archaeological sites. The information available to visitors should be upgraded.

According to the additional information supplied by the State Party in November 2024, key stakeholder agencies engaged in building awareness of the historic value of Port Royal have collaborated in the past to create storyboards, billboards, directional signs, walking tours, exhibitions, and documentaries for the interpretation of the nominated property. Recently, the development of a virtual museum of the underwater city has begun. A formal interpretative plan will be completed by 2027. Additional information provided

by the State Party in February 2025 indicates that interagency dialogue for the development of a comprehensive tourism management plan by 2027 has already begun. The process will be guided by the Port Royal and Palisadoes Preservation Scheme (2024) and the strategies currently being employed by the agencies to mitigate against any potential negative impacts of tourism, on both the natural and cultural environment, will form the basis of the plan.

The additional information provided by the State Party in November 2024 also indicated that the Institute of Jamaica and the Port Authority of Jamaica are currently in the process of establishing a Port Royal Museum, which will explore the history of Port Royal from the Taíno (Indigenous people) and Spanish periods through to the English occupation and the 20th century. A collection of artefacts from the 17th century and other periods will be on display. The new museum will be located in the buffer zone of the nominated property, at the Old Coal Wharf. No time-frame has been given for the completion of this project.

Community involvement

Key stakeholders have been identified to assist with the protection and management of the nominated property. These include community members, local business owners, government agencies, universities, and private individuals. However, the State Party mentions that more community involvement and support are needed in the process of maintenance. More detailed information on this issue was provided by the State Party in the additional information supplied in February 2025, where the training of community members as tour guides, cultural and environmental wardens, and restorers was highlighted.

Community members and special interest groups are active members of the Palisadoes-Port Royal Protected Area Management Committee and as such involved in the planning and management processes of the nominated property.

ICOMOS considers that there has been basic community involvement (mainly focused on informing the population) during the nomination process. Now, the Palisadoes-Port Royal Protected Area Management Committee offers the possibility for community involvement in the planning and management process.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the State Party has created an effective legal and institutional framework for the protection of the nominated property. Some of the recently created or updated management documents still have to be officially approved in order to become operational. The new cruise ship pier has increased the importance of Port Royal as a port of entry to Jamaica. It is essential to monitor the nominated property closely regarding the impact increased numbers of tourists may have on its attributes. Additional work is needed to ensure that visitors receive sufficient information about the nominated property. The local community has been informed about the nomination process and seems supportive; local stakeholders, in

addition to the duty bearers, are involved in the management and decision-making processes.

6 Conclusion

In deferring its examination of the previous nomination of this property at its 43rd session (Baku, 2019), the World Heritage Committee made a series of recommendations (Decision 43 COM 8B.39). The State Party has addressed these recommendations in this current nomination, as follows:

The nominated property has been reconceptualised as a single relict archaeological landscape which includes all the attributes related to the 17th-century archaeological vestiges, both underwater and terrestrial, of the town destroyed by the 1692 earthquake. Its boundaries cover the whole pre-1692 town, and the terrestrial attributes have now been clearly defined.

The justification of its proposed Outstanding Universal Value has been revised accordingly. ICOMOS considers that criteria (iv) and (vi) have now been justified, and the integrity and authenticity of the nominated property have been demonstrated.

Protection of the terrestrial part now includes all relevant archaeological areas.

Regarding the cruise ship pier, an Underwater Cultural Heritage Risk Assessment was completed in 2022 that considered potential impacts on the nominated property from cruise ships. It was based on a detailed analysis of possible cruise ship movements, and was guided by appropriate technical expertise.

On the basis of Heritage, Archaeological, and Environmental Impact Assessments undertaken in 2019, the creation of the Port Royal Cruise Port in the buffer zone of the nominated property was approved. Installation of an innovative floating articulated pier that has a minimal environmental footprint was completed in January 2020. The pier is anchored at the port end and unfolds to meet ships offshore. Multi-purpose pier-side facilities were built at the same time.

A detailed carrying capacity analysis of visitor numbers and visitor flows was completed in 2024.

The protective legal instruments guiding the tourism development process have been strengthened.

The availability of human and financial resources to properly implement the actions described in the management plan are ensured. Articulation and complementarity among the different managerial instruments are likewise ensured.

A disaster management and risk preparedness plan, Port Royal & Palisadoes Disaster Risk Management Plan 2022-2026, was drafted but has not been approved yet.

An inventory of terrestrial and submerged cultural resources relating to the 1692 town was completed in 2022, though the level of detail in this inventory is unclear.

The conservation and protection of the underwater archaeological remains are guided by the principles for protection set out in the 2001 UNESCO Convention on the Protection of the Underwater Cultural Heritage.

Regarding the current nomination, ICOMOS has made recommendations aimed at improving the monitoring system, and urges the State Party to finalise and approve the management documents that are still pending. More detailed plans concerning future research and visitor management are needed. Furthermore, it is recommended to improve the information presented to visitors. And, finally, ICOMOS considers that the cultural landscape denomination is not warranted.

7 Recommendations

Recommendations with respect to inscription

ICOMOS recommends that The Archaeological Landscape of 17th Century Port Royal, Jamaica, be inscribed on the World Heritage List on the basis of **criteria (iv) and (vi)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

The town of Port Royal is situated on a spit of land (Palisadoes) at the mouth of Kingston Harbour in south-eastern Jamaica. In 1692, a severe earthquake devastated the town and submerged a large portion of it under water and sand. Today, the vestiges of the terrestrial and underwater elements of Port Royal are exceptional illustrations of an English urban settlement of the 17th century.

Its well-protected deep-water port allowed the town to quickly become one of the wealthiest and most significant port cities of the British Empire, and its most important regional and transatlantic trade hub in the Americas for goods – and for enslaved Africans. Surviving vestiges include the remains of six forts that guarded the town, some of which are now underwater, and the archaeological evidence of the ensemble of residential, religious, and administrative buildings of the 17th-century town.

Criterion (iv): The Archaeological Ensemble of 17th Century Port Royal is an exceptional illustration of an early English colonial settlement during the period of European expansion and rivalry, which is a significant stage in the history of the Americas. With its deep natural harbour and strategic location in the centre of the Spanish Main, Port Royal developed in just thirty-seven years from a colonial frontier settlement to a pivotal 17th-century port town, documented as the most important English settlement in

the Western Hemisphere. The global network of trade that converged here is reflected in the rich volume of recovered artefacts from as far away as Asia and Europe.

Criterion (vi): The Archaeological Ensemble of 17th Century Port Royal exemplifies England's decisive role in the trafficking of enslaved Africans to the Americas. The fortifications and infrastructure are tangible evidence of the contribution of enslaved Africans to the rise, growth, and sustainability of Port Royal, as well as to the transfer of knowledge and skills. The 1692 earthquake caused the deaths of many people, making the property a grave site not only for the merchants and the wealthy, but also for the poor and enslaved.

Integrity

The integrity of the property is based on the terrestrial and underwater evidence of the 17th-century town of Port Royal. The archaeological ensemble contains all the attributes necessary to convey the Outstanding Universal Value, including the entire town encircled by the six fortifications present at the time of the devastating earthquake in 1692, and its 17th-century urban plan. Although there are only a few standing structures from pre-earthquake Port Royal remaining today, due to numerous natural and anthropogenic disasters, new buildings have followed the intent and alignment of the 17th-century layout of the town, preserving the foundations of pre-1692 Port Royal. The underwater sections of the town are exceptionally well preserved under layers of sediments.

Authenticity

The property is in its original maritime location, and though its setting has evolved, it remains evocative of its past vocations. The forms, designs, materials, and substances of its urban plan, as well as the terrestrial and underwater archaeological evidence of its 17th-century past remain largely intact and legible. Fort Charles, for example, has undergone several restorations over time, but its materials and design can be considered largely intact. Underwater features are completely unchanged and have been preserved *in situ*; their authenticity is unquestionable. In terms of uses and functions, the property continues to play an important role in the maritime activities of the Kingston and Port Royal harbours.

Protection and management requirements

The property is protected under two national legislations: the Jamaica National Heritage Trust (JNHT) Act of 1985, and the Natural Resources Conservation Authority (NRCA) Act of 1991. Under the 1985 JNHT Act, the area was designated as Protected National Heritage in 1999, while Palisadoes and Port Royal were designated as Protected Area in 1998, under the 1991 NRCA Act. The latter is enforced through the National Environment and Planning Agency (NEPA). The property and its buffer zone are also protected under the Convention on the Protection of the Underwater Cultural Heritage (UNESCO, 2001) since 9 August 2011.

With these national and international legislations, a collaborative approach is employed by the government agencies with legal jurisdictions in the protected area, the Jamaica National Heritage Trust (JNHT) and the National Environment and Planning Agency (NEPA). These agencies co-manage the protected area to ensure the effective management and monitoring of the property.

The Port Royal & the Palisadoes Management Plan 2022-2027 developed by the JNHT, as well as the Final Draft Palisadoes-Port Royal Protected Area Management Plan 2021-2031 prepared by the NEPA, collectively provide the necessary conservation, management and monitoring of the protected area. Local stakeholders and duty bearers are involved in the management and decision-making processes.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Revising, updating, and approving the Zoning Plan for the Palisadoes-Port Royal Protected Area 2014-2019,
- b) Approving the draft Port Royal & Palisadoes
 Disaster Risk Management Plan 2022-2026,
- c) Identifying key monitoring indicators that help to describe more specifically the state of conservation of the property in quantitative terms and that can be used as baseline data for protection, conservation, and management,
- d) Ensuring that the inventory of terrestrial and submerged cultural resources related to the 1692 town has an adequate level of detail to support management objectives,
- e) Rehabilitating the 19th-century sea wall that protects the 17th-century streets of Port Royal from erosion caused by storm surges,
- f) Organising the existing documentation of the property (historic documents, research documentation, etc.) in an accessible centrally held or systematically archived manner,
- g) Defining clear objectives for future research activities in a detailed research plan, which will also help to coordinate the work of different institutions at the property,
- h) Developing and implementing a conservation plan that employs locally trained specialists, thereby fostering local expertise in conservation,
- Finalising the formal interpretative plan and the tourism management plan and, based on these, upgrading the information available to visitors at the property and in the museums,

- j) Finalising the installation of the Port Royal Museum in order to give more visibility to the artefacts recovered from the property,
- k) Developing and implementing a Heritage Impact Assessment for development proposals.

ICOMOS further recommends that the name of the property be changed to: "The Archaeological Ensemble of 17th Century Port Royal".



Map showing the boundaries of the nominated property

IV Mixed property

A Asia and the Pacific New nomination

Mount Kumgang (Democratic People's Republic of Korea) No 1642

1 Basic information

Official name as proposed by the State Party Mount Kumgang - Diamond Mountain from the Sea

Location

Outer Kumgang-Inner Kumgang Area Kosong County and Kumgang County Kangwon Province

Lagoon Samil Area in Sea Kumgang Kosong County Kangwon Province

Haemanmulsang Area in Sea Kumgang Kosong County Kangwon Province

Chongsokjong Area in Sea Kumgang Thongchon County Kangwon Province

Democratic People's Republic of Korea

Brief description

Mount Kumgang (or "Diamond Mountain") is a mountainous landscape which is nominated for its cultural and natural heritage values. It is proposed as a landscape exceptional natural beauty and significant physiographical features. The nominated property includes Buddhist temples and hermitage sites dating from the 6th to the 20th century, and includes pagodas, steles, stupas, stone lanterns and sculptures, stone calligraphy, and associations with the intangible cultural heritage of Korean mountain Buddhism which is intertwined with Taoism and with local spiritual beliefs. A number of specific natural features and Buddhist sites within the nominated property are important within the traditions of Buddhist pilgrimage. Its exceptional beauty and pristine environment are deeply intertwined with the sacredness of the mountain. The scenery of Mount Kumgang has been praised by poets and artists for centuries, and there are many paintings, legends and poems associated with the beauty and sacred importance of the mountain.

Category of property

In terms of categories of cultural property as set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of four *sites*.

In terms of the Operational Guidelines for the Implementation of the World Heritage Convention (2024), paragraph 47, it has also been nominated as a cultural landscape.

Note: the property is nominated as a mixed cultural and natural property. IUCN will assess the natural values, while ICOMOS assesses the cultural values.

Included in the Tentative List

25 May 2000 as "Mt. Kumgang and the Historical Relics in and around the Mountain"

Background

This is a new nomination.

Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

An ICOMOS technical evaluation mission visited the nominated property from 1 to 12 October 2024. This mission was conducted jointly with IUCN.

Additional information received by ICOMOS

A joint letter with IUCN was sent to the State Party on 15 October 2024 requesting further information about the rationale for the selection of the component parts based on their cultural heritage values, the cultural landscape approach, historical evidence and research, the comparative analysis, Buddhist practices, traditions and pilgrimage, conservation histories, tourism management; community associations/involvement, planned and approved development projects, research programme, and protection and management.

An interim report was provided to the State Party on 20 December 2024, summarising the issues identified by the ICOMOS World Heritage Panel and the IUCN World Heritage Panel.

Further information was requested in the interim report on: consideration of criterion (vi), the comparative analysis, Buddhist practices at Mount Kumgang, Taoism and local spiritual beliefs, the selection of component parts, buffer zone boundaries, archaeological surveys, tourism planning, stone carvings and historic trails, the management system, and the interpretation.

Additional information was received from the State Party on 28 February 2025.

All additional information received has been incorporated into the relevant sections of this evaluation report.

Date of ICOMOS approval of this report

12 March 2025

2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects. Please note that the natural landscape and elements are described and evaluated by IUCN.

Description and history

Mount Kumgang (or "Diamond Mountain") is a mountainous landscape which is nominated for its cultural and natural heritage values. It is proposed as a cultural and natural landscape of exceptional natural beauty and significant physiographical features, and for its Korean mountain Buddhist cultural traditions. The nominated property stretches 46 kilometres from east to west and 49.8 kilometres from north to south. Mount Kumgang was designated as a UNESCO Biosphere Reserve in 2018.

This is a serial nomination of four component parts: the mountainous Outer Kumgang-Inner Kumgang Area (001), and three component parts in the "Sea Kumgang" area on the coast, the Samil Lagoon (002), the Haemanmulsang Area (003) (which includes sea cliffs, sandy beach and islands), and the coastal Chongsokjong Area (004). The biological and geological diversity and scenic beauty of the nominated property are evaluated by IUCN, although as is often the case, some of the cultural heritage values are inseparably associated with the natural beauty, geology, landforms, water and biological diversity of the nominated property. The famed scenic beauty of the nominated property is based on its diverse landscapes and the combination of sharp peaks, valleys, lagoons, lakes and waterfalls.

The largest of the four component parts is the Outer Kumgang-Inner Kumgang Area (001). It is in this area that the peaks of Kumgang are located, ten of which are more than 1,500 metres in height. Although stone carvings are found in all four component parts, the key cultural heritage attributes described by the State Party are all located in the Outer Kumgang-Inner Kumgang Area (001). The Inner Kumgang area is relatively gently-sloping, whereas the Outer Kumgang area in the east is very steep.

The three remaining component parts are located in coastal areas, termed "Sea Kumgang" and featuring sea cliffs, sand banks, lakes and islets.

The nominated property includes Buddhist temples and other structures dating from the 6th century to the early 20th century, stone calligraphy and sculptures, and associations with the intangible cultural heritage of Korean mountain Buddhism. Its scenic beauty and clean environment are deeply intertwined with the sacredness of the mountain.

Although there are relatively few potential attributes in component part 002 (Samil Lagoon), historical texts indicate that the area has been a popular place for Buddhist practices, and the Mongchon hermitage site has functional links to the Buddhist sites in component part 001. This area

is also the place where Yang Sa On (1517-1584), one of the three most famous calligraphers of the Korean Peninsula, practised his calligraphy. He left his poem praising the beauty of Samil Lagoon carved on the rock next to the place where he practised his calligraphy. His artistic works can also be found in component part 001.

Much of the information provided by the State Party concerning the inclusion of component parts 003 and 004 centres on their geological significance and scenic beauty.

The temples within the nominated property were established in the 6th and 7th century CE, namely the Phyohun Temple (670), Jongyang Temple (600), Singye Temple (519), Podok Hermitage (627) and Pulji Hermitage (666). There are many other elements associated with the importance of this landscape for Buddhism including steles, stupas, and stone lanterns. The 14th century Myogilsang and Sambul Rock feature some of the largest Buddha sculptures in the Korean Peninsula; and there are three 9th century stone pagodas within the nominated property. The stele and stupa of Sosan, a key figure in the history of Korean Buddhism from the 17th century is also found within the nominated property.

In addition to its scenic beauty, Mount Kumgang is considered to be an important sacred mountain within the Buddhist world.

The area of the four component parts totals 21,114.7 ha, with a buffer zone of 69.062.76 ha.

Buddhism was introduced into Korea in the 4th century CE, and mountain temples were constructed from the 7th century CE. According to the State Party, Buddhist hermitages were built within the nominated property from the mid-5th century. There are few tangible remains extant from this very early time, although in the additional information received in November 2024, the State Party explained that there are archaeological remains of the Sangun and Poun hermitages from the 5th century near the Singye Temple.

Buddhism was the dominant religion from the Koguryo period, although in later periods it was suppressed in favour of Neo-Confucianism when many monks escaped to remote and mountainous areas.

Later, during the Japanese colonial period, Buddhism was revived. However, during the Korean War (1950-1953) many Buddhist temples and hermitages were lost or severely damaged.

When the Democratic People's Republic of Korea was established, the implementation of socialism discouraged the practices of Buddhism. However, these practices are continuing through the Buddhist Federation of Korea, established by the state. Monks are employed by the government and are assigned to the temples to serve religious needs.

In the additional information received in November 2024, the State Party explained that the principal practitioners of Buddhist rituals are monks of the three temples and lay Buddhists from local and nearby areas, although Buddhists from across the country come to participate in important rituals

There are several interpretations of the meaning of the name "Kumgang". According to additional information received in November 2024, the State Party explained that the word is derived from a Buddhist scripture "Taebanggwangbulhwaomgyong" (大放光佛華嚴經), and also means the most precious of seven treasures possessed by Jesok, who is regarded as a leader of the guardians of the Buddhist world. It is also associated with the "thunderbolt", a ritual implement in tantric Buddhism that symbolises the indestructability of Buddhist teaching. Later, the term was used to mean "indestructible", like the hardness of diamonds which has been invoked in the name of the nominated property. As the indestructible eastern guardian of the Buddhist world, many Buddhists wished to visit Mount Kumgang during their lifetime. For the elites in the Joseon Dynasty, traveling to the Mount Kumgang was an aspiration for those wanting to show their refinement, metaphysical ambition and prestige.

A number of specific features of the landscape, such as the Sambul Rock, the steles of Great Master Sosan, the high peaks and stream surrounding Phyohun Temple or the routes through the mountains, are important in the traditions of Buddhist pilgrimage.

Many of the historic sites, scenic spots and stone calligraphy also reflect a fusion of Buddhism with Taoism and local indigenous beliefs. In additional information received in February 2025, the State Party provided examples of tangible expressions of these belief systems within the nominated property, as well as place names and other associations. Indigenous beliefs in gods of mountains and sea or diverse totem symbols like the Great Bear, tiger, bear and turtle are found in all four component parts. These can be seen at sites such as the Sansin and Chilsong shrines, Pom (tiger) Rock, Kom (bear) Rock and Kobugi (turtle) Rock at the temples in the Outer Kumgang-Inner Kumgang Area (001); Kobugi (turtle) Rock in Lagoon Samil Area in Sea Kumgang (002); Great Bear Rock and Kobugi Rock in Haemanmulsang area in Sea Kumgang (003); and Ryonggunggidung Rock (pillars of Sea God's palace) and Kobugi Rock in the Chongsokjong area (004).

From as early as the late 6th and early 7th century, the scenery of Mount Kumgang was praised by poets and artists. A number of landscape paintings of the nominated property were created by famous artists and became well known abroad. The nominated property is also associated with many legends.

In the 15th to 17th centuries, it was common for Korean scholars, literati, and bureaucrats to visit famous scenic spots, create poems, and inscribe them in stones at those locations. The contents of these poems express the

feelings of the authors inspired by the scenery and their praise for the natural beauty. Accordingly, many famous calligraphers have left their artistic works at these spots. The carvings include names, poems, anecdotes and praise for the scenic location. The stone calligraphy is vast, and the full number is unknown. The most recent stone carvings made by visitors date to the 1990s. The continuity of sightseeing traditions is demonstrated by the presence of historical trails in the nominated property, which have been recently mapped.

State of conservation

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation of the cultural heritage attributes of the nominated property is generally good. All the buildings, archaeological sites, stone artefacts, and infrastructures are in a stable condition. ICOMOS has provided some recommendations to further strengthen the conservation of the cultural heritage attributes.

Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the cultural heritage attributes of the nominated property are natural deterioration, heavy rainfall and forest fires, changes in cultural traditions, tourism development, and the installation of infrastructure for visitors and site management. Due to the diversity of the cultural heritage attributes, these apply differently within the nominated property.

Disaster risks identified by the State Party include heavy rainfall and snow, typhoons, forest fires, harmful insects, earthquakes, and seismic waves (tsunamis). Earthquake and tsunami risks are not significant for the cultural heritage sites. Heavy rainfalls, snow and typhoons may cause damage to the wooden structures, destabilise the stone lanterns, steles, and pagodas, and weaken retention walls of the platforms. At this stage, ICOMOS notes that regular maintenance has mitigated these risks.

All the cultural heritage sites in the nominated property have a well-maintained firebreak surrounding them to prevent losses from forest fires. There is no electricity in any of the wooden buildings, and no fires are permitted in them. Monks of the temples and site managers hold firefighting drills regularly.

Change of use, particularly the potential loss or reduction of Buddhist practices may pose a threat to the continuity of the associative cultural landscape. The State Party has prohibited the former practices of stone carving within the nominated property, and while this is a loss of a cultural tradition, it is desirable for the conservation of the most significant examples.

Graffiti is seldom seen although it sometimes occurs on stone carvings. Currently, the maximum number of tourists in a group is fifty. Since the trails are narrow, the guides may not be able to watch all the visitors closely at all times. Smaller group sizes and the creation of non-intrusive physical or psychological barriers to protect the most fragile and significant stone carvings might assist their protection.

Infrastructure installations such as guard rails, trails, platforms and bridges are needed in this terrain but can be visually intrusive and some have damaged stone carvings.

There are also some tourism facilities such as restaurants at the entrances to the Outer Kumgang Area (component part 001) and Samil Lagoon (component part 002) that are somewhat visually intrusive.

Some tourism developments are being planned within the buffer zone and wider setting, and in the additional information received in November 2024 and February 2025, the State Party advised that these developments are still being planned.

ICOMOS considers that the state of conservation of the cultural heritage features is good and that factors affecting the nominated property are natural deterioration, forest fire, diminished Buddhist practices, and visitor/tourism infrastructure. For most of these, the State Party has instituted adequate monitoring and maintenance. Existing visitor infrastructure and new projects should be reviewed and rigorously assessed within the framework of heritage impact assessments and a Sustainable Tourism Development Strategy.

3 Proposed justification for inscription

Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value for its cultural heritage values for the following reasons:

- Mount Kumgang expresses a harmony between nature and Korean religious beliefs.
- The nominated property is an outstanding manifestation of Korean Buddhist mountain culture and architecture created on the basis of superlative natural beauty and the tradition of worshipping famous mountains.
- Mount Kumgang has been a site of Korean Buddhist culture and place of pilgrimage from the 5th century, embodying a long history of Buddhist mountain culture as well as indigenous beliefs and Taoism.
- The stone inscriptions found within the nominated property reflect the "biggest and oldest visitors' book" of pilgrimage, as well as containing calligraphy of outstanding global significance.
- Mount Kumgang is a place associated with mountain legends and fairy tales, folk songs, poems, and drawings, including works of many famous writers and artists.

The State Party proposes this serial property as a continuing organically evolved cultural landscape, and as an associative cultural landscape. The continuing organically evolved landscape is justified by the State Party on the basis that it retains an active social role in contemporary society associated with the traditional way of life, which has organically evolved with the outstanding nature. It demonstrates evidence of the evolution of Buddhist rituals over time, which are still continuing at three of the temples, and through the use of the pathways.

Although some traditional land use practices are briefly mentioned (such as agriculture, honey collection, medicinal herbs and mineral water), ICOMOS does not consider that this is represented within the nominated property in an exceptional way. The use of the organically evolved continuing cultural landscape category is not sufficiently demonstrated, but the framework of the associative cultural landscape category is more relevant.

The State Party also considers that modern tourism is an extension of the long history of uses of the landscape, particularly through the continuing use of tourism trails. ICOMOS understands this connection and agrees that the historic access and sightseeing trails are of heritage significance. However, this does not justify drawing a link between modern day tourism and practices of pilgrimage in the construction of the proposed Outstanding Universal Value of the nominated property.

The associative cultural landscape category is proposed by the State Party on the basis of the religious, artistic and cultural associations of the mountains. In the additional information received in November 2024, the continuing Buddhist practices (despite disasters that occurred in the 20th century), including the temples, their layout or fengshui, and traditions of pilgrimage are described as justifying this category. The State Party considers that the attributes of the associative cultural landscape also include: the peaks, waterfalls and pools; the names associated with Buddhist, Taoist and indigenous beliefs; and the many legends, songs and artworks associated with the mountains. ICOMOS considers that this category is relevant for the nominated property (particularly component parts 001 and 002).

Additional information received in November 2024 described the ability of the stone calligraphy to demonstrate the harmony with nature.

Based on the nomination dossier the key attributes of the proposed Outstanding Universal Value are: the Buddhist sites and structures (temples, hermitages, pavilions, statues, stone pagodas and lanterns, steles and stupas), and stone calligraphy/engravings. ICOMOS considers that the following aspects are also potential cultural heritage attributes: historic paths and trails, geomancy of the locations of temples and hermitage, archaeological sites, the names of scenic spots, and Buddhist rituals and traditions.

Comparative analysis

The comparative analysis for the cultural criteria has been developed around the following parameters: Buddhist cultural heritage (globally and in East Asia); sacred mountains in the Asia-Pacific region and within the Korean Peninsula; mixed World Heritage properties associated with religious beliefs (globally); and famous mountains and Buddhist mountain culture in the Korean Peninsula.

The State Party has briefly canvassed the characteristics of many World Heritage properties using this broad framework, concluding that the nominated property demonstrates Korean mountain Buddhist culture in an exceptional way. This is based on the ancient history and enduring presence span of Buddhism in this area, its associations with noted priests, and the representation of local beliefs alongside the Buddhist traditions. The analysis also considers that Mount Kumgang is a significant sacred mountain and a place of pilgrimage.

ICOMOS considers that the comparison with World Heritage properties associated with Buddhism is the most relevant part of the comparative analysis. A useful comparative analysis is provided of twenty-eight mountains in the Democratic People's Republic of Korea with mountain temples.

In the additional information received in November 2024, the State Party provided a useful table that outlines the chronology of the earliest periods of Buddhism in Korea, China and Japan. This information demonstrates the very early establishment of Buddhism within the Outer Kumgang-Inner Kumgang area (component part 001).

The State Party has also presented a brief comparative analysis with twenty-nine other World Heritage cultural landscapes. ICOMOS concurs with the conclusion of the State Party that Mount Wutai (China, 2009, (ii), (iii), (iv), (vi)), Lushan National Park (China, 1996, (ii), (iii), (iv), (vi)), and the Sacred Sites and Pilgrimage Routes in the Kii Mountain Range (Japan, 2004, (ii), (iii), (iv), (vi)) are relevant for the comparative analysis, demonstrating both similarities and differences with the nominated property, including a more distinctively Korean expression.

ICOMOS considers that the most relevant geocultural context is East Asia, particularly in relation to mountain Buddhism and sacred mountains. The comparative analysis could be further extended to other holy mountains in East Asia (not inscribed in the World Heritage List), such as Jiuhua-shan in China and Koyasan in Japan which combine nature and religion in important ways, although the significance of Kumgang as a sacred mountain has been established.

In additional information received in February 2025, further comparative information was provided about Buddhist properties within the Korean Peninsula, such as Kwangpop Temple in Mount Taesong, Anguk Temple in Mount Pongrin, Pophung Temple in Mount Kangryong, Hwaom Temple in Mount Jiri, Sutok Temple in Mount Toksung,

and Pohyon temple in Mount Myohyang; and later temples such as the seven sites that comprise the serial property of World Heritage property of Sansa (Republic of Korea, 2018, (iii)).

ICOMOS notes that mountain temples have been important throughout Korean history, especially via the rise of Zen Buddhism in the 9th century, and later when the adoption of neo-confucianism pushed Buddhism into the mountains throughout the Korean Peninsula. Similarities and differences between the extant Buddhist temples in the Korean Peninsula have been identified through the additional work undertaken, ICOMOS considers that a key factor is that Mount Kumgang is believed to be the eastern guardian of the Buddhist realm, lending a specific significance to the remaining temples within nominated component part 001.

ICOMOS stresses that the comparative analysis does not need to aim to establish that the nominated property is entirely unique, but rather it should illuminate what makes it distinctive and potentially exceptional.

ICOMOS considers that the comparative analysis justifies consideration of this property for the World Heritage List.

Criteria under which inscription is proposed

The property is nominated on the basis of cultural criterion (iii) and natural criteria (vii) and (viii).

Criterion (iii): bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;

This criterion is justified by the State Party on the grounds that the nominated property bears an exceptional testimony to Korean mountain Buddhism traditions and associated cultural traditions that express the relationship between people and nature. The traditions of Buddhism over many hundreds of years and the historical role of Mount Kumgang as a major pilgrimage place are the key arguments advanced by the State Party, and the extant temples, hermitages, stupas and stone engravings demonstrate these characteristics, in addition to the many songs, poems and artworks inspired by Mount Kumgang. In this respect, the proposed superlative aesthetic qualities of the nominated property are linked to the cultural heritage values. This has been assessed according to criterion (vii) by IUCN.

ICOMOS considers that Mount Kumgang has been a sacred mountain within the Korean Peninsula for centuries and is a place where Korean mountain Buddhism flourished in dialogue with the scenic beauty of the landscape. ICOMOS considers that this criterion is potentially demonstrated for two of the four nominated component parts (component parts 001 and 002).

Criterion (vi): to be directly or tangibly associated with events or living traditions, with ideas, or with beliefs, with artistic and literary works of outstanding significance; Although not nominated under criterion (vi), ICOMOS queried whether it could be potentially relevant for the nominated property due to the use of the associative cultural landscape category, the associations with poetry and paintings, and the cultural value of the scenic beauty of this area. ICOMOS raised this possibility with the State Party during the evaluation process. In the additional information received in February 2025, the State Party acknowledged that criterion (vi) was potentially applicable due to the abundance of Buddhist art, stone calligraphy, the long history of pilgrimage and sightseeing and the large number of folk songs, poems and artworks inspired by the beauty of the mountain. However, the State Party advised that it considers these arguments more relevant to the justification for criterion (iii).

ICOMOS considers that two of the nominated component parts (001 and 002) demonstrate criterion (iii).

Integrity and authenticity

Integrity

The integrity of the nominated serial property is based on the state of conservation and the way major pressures are managed, and the intactness of the material evidence of the selected component parts. For serial nominations, integrity is also a measure of whether the component parts contain all the attributes necessary to express the proposed Outstanding Universal Value, and how each component part contributes to that value.

The boundaries of the nominated property and buffer zone have been demarcated with consideration of the integrity of natural values. Because they are much larger than needed to protect the cultural values, all the attributes conveying the proposed Outstanding Universal Value are included in the boundaries of the nominated property, and the legal protection is adequate.

The component parts have been primarily selected to meet the requirements of integrity for natural values. Almost all cultural heritage features identified as attributes of the proposed Outstanding Universal Value are located in the Outer Kumgang-Inner Kumgang Area (component part 001). In the additional information received in November 2024, the State Party acknowledged that the features associated with the Korean Buddhist mountain culture are located in this component part alone, but that all four component parts are related to the tradition of mountain worship. This is demonstrated by the vast number of stone calligraphy of poems as well as names of visitors found in all component parts. Additional information received in February 2025 provided further justification for the inclusion of all four component parts based on the view that all four comprise the Korean understanding of Mount Kumgang throughout history, and that the cultural linkages between them are established through traditions of intangible cultural heritage.

ICOMOS appreciates these clarifications but considers that there is insufficient justification for the inclusion of all the

nominated component parts on the basis of cultural heritage values. Aside from the cultural heritage elements present in component part 001, Samil Lagoon (component part 002) has a small number of associated cultural heritage sites (such as the Mongchon Hermitage and some stone carvings, including the calligraphy by Yang Sa On). These justify the inclusion of component part 002 in the nominated serial property for cultural heritage reasons. There are substantial tangible and intangible cultural and functional links between these two component parts.

The State Party has explained that stone carvings are found at component part 003, but these could not be visited by the joint ICOMOS-IUCN technical evaluation mission because they are in a military zone. Based on the information provided, ICOMOS does not consider that these are sufficient to justify inclusion of this coastal component part in the serial nomination on cultural heritage grounds. Similarly, while there are some stone carvings in component part 004, their contents are mainly the names of the persons who have visited the site, and the links to the proposed Outstanding Universal Value are weak. Component part 004 is also relatively small and distant from the others.

In conclusion, ICOMOS considers that the inclusion of component parts 001 and 002 is justified on the basis of cultural heritage values, but that the inclusion of the other component parts is not justified.

ICOMOS therefore considers that the integrity of only two of the nominated component parts (component parts 001 and 002) has been demonstrated.

Authenticity

The authenticity of the nominated property is based on the ways in which the attributes can be understood as conveying the proposed Outstanding Universal Value. This applies only to the cultural heritage aspects of the nomination and can include: form and design; materials and substance; use and function; traditions, techniques and management systems; location and setting; language, and other forms of intangible heritage; and/or spirit and feeling.

ICOMOS considers that the authenticity of the proposed attributes varies. In general, the authenticity of the cultural heritage attributes is well demonstrated, encompassing archaeological sites, natural features, stone artefacts, historical paths and trails, stone carvings, as well as infrastructure linked to building complexes and platforms.

The authenticity of the timber buildings with their painted polychromy schemes (*tanchong*) is vulnerable because they have undergone repeated repairs and reconstructions, and none are original to their first construction.

ICOMOS notes that for buildings that survived the Korean War (1950-1953), the State Party has preserved the wooden structures and *tanchong* as best as possible; but

for buildings reconstructed after that period, the *tanchong* have been repainted using acrylic paints instead of traditional mineral pigments, while retaining the patterns.

The older temples demonstrate authenticity and are listed on the national register. An example is the Panyabo Hall of the Phyohun Temple where the original elements of the wooden structure and the *tanchong* have been preserved as far as possible. In 2019-2020, the rafters of the back eave were replaced. There is a plan to repaint the lower part of the Panyabo Hall in 2025, leaving the original *tanchong* on the upper part of the structure (above the capitals of the columns). ICOMOS notes that it is a common practice to paint the lower parts of wooden buildings from time to time to protect the wooden columns, since this part of the building has no *tanchong*.

The State Party has confirmed that when wooden elements are replaced, the original species of wood is used, and that traditional techniques for treating the timber elements are followed, using a principle of minimum intervention. However, ICOMOS notes that this conservation policy has not been implemented in all cases. For example, the *tanchong* of the Pulji Hermitage and Chilson Shrine of the Mahayon site have been repainted. The State Party explained that this was because almost all of the original *tanchong* was lost, and that repainting was done to ensure the preservation of the wooden structure. In these cases, the original pattern has been preserved, but acrylic paints have been used, in part due to the cost and difficulties of sourcing the traditional pigments, and the greater durability of acrylic paint.

Wooden structures such as the Phyohun Temple, Jongyang Temple, Podok Hermitage, Pulji Hermitage, and Chilsong Shrine of Mahayon Buddhist School site exhibit a high degree of authenticity in relation to the proposed Outstanding Universal Value.

For buildings reconstructed since the Korean War, different principles have been applied and more non-traditional materials have been used. For example, the Kwanphok Pavilion (waterfall-watching pavilion) has been reconstructed on the original foundations, with forms based mainly on historical photographs. The *tanchong* patterns have been selected following the traditional protocols and the memories of older people. The pigments are often modern acrylic paint. The Singye Temple is also an example of this approach.

ICOMOS notes that the authenticity of the wooden buildings varies. The State Party has worked to preserve as much historical information as possible in conservation interventions and has ensured that old and new materials are distinct. In addition, these structures are part of continuing Buddhist practices that contribute to the proposed Outstanding Universal Value.

Overall, ICOMOS considers that the authenticity of the cultural heritage attributes of component parts 001 and 002 are demonstrated. Because there are insufficient attributes of Outstanding Universal Value in the remaining

two component parts, the requirements of authenticity are not demonstrated for them.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the cultural heritage attributes of the nominated property have been met only for two of the four component parts (component parts 001 and 002).

Boundaries

As of 2020, there were 1,715 inhabitants in the Outer Kumgang-Inner Kumgang Area (component part 001), and a total of 120,010 inhabitants in the buffer zone (36,797 in Thongchon County, 69,151 in Kosong County, and 14,062 in Kumgang County).

The delineation of the boundaries follows topographical features such as mountain ridges, rivers, valleys, hills, roads, railways, and administrative boundaries. The State Party is in the process of erecting roadside markers at the main entrances to the nominated property and buffer zone. Most parts of component part 001, all of component part 002, a small portion of component part 003, and a large part of the buffer zone between component parts 001 and 002, as well as the buffer zone to the north of component part 001, are within the Mount Kumgang Natural Park. The southern half of component part 001 is covered by the core area and buffer zone of the Mount Kumgang Biosphere Reserve. These natural heritage designations support the protection of cultural heritage attributes.

Additional information was received from the State Party in February 2025 concerning the large extent of the buffer zone between component parts 001 and 004. This is based mostly on environmental protection considerations and the desire to include the relatively distant component part 004 in the serial property.

According to the Korean Sansa (mountain monastery) tradition, the siting of temples and hermitages takes into consideration of the geomancy of natural features. However, ICOMOS notes that the protection areas for the listed building complexes and archaeological sites have been drawn with consideration of their safety without considering the geomancy values imbued in the landscape setting. While this does not impact on the boundaries for the nomination itself, ICOMOS recommends that the State Party should re-evaluate the boundaries of the listed building complexes and archaeological sites from a cultural landscape perspective so as to revise the boundaries to include the underlying geomancy in their locations and siting.

ICOMOS considers that the boundaries and buffer zone of component parts 001 and 002 are clearly delineated. The boundaries include all the proposed cultural heritage attributes, and the buffer zone provide an additional layer of protection.

Evaluation of the proposed justification for inscription

In summary, ICOMOS considers that the comparative analysis justifies the consideration of the nominated property in the World Heritage List on the basis of cultural criteria. Criterion (iii) is demonstrated only for two of the four component parts (component parts 001 and 002), and the requirements for authenticity and integrity are met for those two component parts. The boundaries and buffer zone are appropriate for the integrity and protection of the cultural heritage values. The delineation of the listed building complexes and archaeological sites should be reviewed from a cultural landscape perspective to ensure the inclusion of the underlying geomancy principles.

4 Conservation measures and monitoring

Documentation

The Preservation Agency for National Heritage of Kangwon Province (PANHK) stores the documentation and archives for the nominated property. All the cultural heritage sites registered as National Treasures or Preservation Heritage sites in the nominated property have been documented in detail with measured drawings and photographs. The site maps have been digitised, and all information is stored in a GIS system, with back up stored in the National Preservation Agency and the National Authority for the Protection of Cultural Heritage (NAPCH) in Pyongyang.

The polychromy schemes on the wooden structures (*tanchong*) have been recorded with photography and are stored in a database. The State Party confirmed that in the future, a colour scale will be used in this documentation to calibrate the colours when the images are reproduced. There is also a system of traditional documentation, using paint and paper by master painters and their students. These master painters are involved in the conservation and repainting of *tanchong*, and the traditional techniques are transmitted through the work of the master painters and their students.

There are many paintings and other artistic representations of Mount Kumgang and individual sites and features within the nominated property held by the National Art Gallery. The many poems, legends, and anecdotes that have been inspired by the beauty and religious significance of the nominated property are recognised by the State Party and are transmitted inter-generationally within the local communities. These are documented in the twelve-volume *Encyclopedia of Mount Kumgang*.

There are some inventories of the stone carvings found throughout the nominated property (photographs and measured drawings) and their condition is monitored. In the additional information received in November 2024, the State Party advised that a comprehensive survey of stone inscriptions is in progress and should be completed by 2030. The State Party has prepared a set of maps showing the historic trails, although they require additional

evaluation to determine which of them are of historical importance.

Research is mainly undertaken at the national level and conducted by the universities and research institutes. Each year, the NAPCH establishes a list of research projects which is reviewed by experts. Approved projects are commissioned through the Academy of Science and Technology and the Academy of Social Science. The Korea National Heritage Preservation Agency under NAPCH is responsible for coordinating national research projects related to the conservation of national heritage, including historic relics, scenic spots, and natural monuments.

Although the nomination did not provide much information on the archaeological inventories and excavations, this was augmented by the State Party in the additional information received in February 2025. Archaeological surveys and excavations have occurred at a number of the temple and hermitage sites from the 1970s, although it is not clear how much of this work has been subjected to scientific dating methods. For example, archaeological work has been done at the Mahayon site which recovered human bones, Buddhist figures, pieces of ceramic and porcelain objects, and tiles.

ICOMOS considers that archaeological surveys are an important element for improving the documentation of the cultural heritage values, and should form part of an ongoing Research Plan for the nominated property. Universities and the Academies of Science and Technology and Social Science have archaeological teams, and the Korean National Heritage Preservation Agency has a research group in archaeology. All archaeological activity must apply to the NAPCH, and new construction works require prior archaeological excavation.

Conservation measures

The management plan summarises the repairs and restorations that have occurred to the cultural heritage elements of the nominated property, and additional information received in November 2024 provided further details of the regulatory and policy frameworks that guide conservation decisions, including guidelines for management of historic sites, conservation techniques, measuring and survey of historic sites, investigation of the preservation state of historic sites, and for urgent treatment of unearthed artefacts. There are also technical guidelines for the management of natural monuments and scenic spots.

Active conservation measures include daily maintenance, minor interventions, and major interventions. Each cultural heritage site is assigned one or more caretakers from the responsible governmental institutions. Every day, the caretakers visit the sites and undertake maintenance such as cleaning and ventilating buildings, weeding, maintaining access paths, clearing firebreak zones and maintaining drainage. Every three months, the roofs are inspected, weeded if necessary, and displaced tiles are repositioned. Every six months, experts from the National Heritage Preservation Agency of Kangwon Province conduct a

condition survey of all the cultural heritage sites in the nominated property and undertake minor interventions such as restoring distorted stone walls or similar interventions that require specialist skills. Every year, experts from the Korean National Heritage Preservation Agency conduct condition surveys and produce a list of conservation projects (and budgets) that are reviewed by the Non-standing National Heritage Protection Committee. These are the basis for major interventions. Detailed guidance is given for each project in terms of techniques and material uses. Materials and labour are provided by both the central and local governments. Detailed documentation, including before and after photographs, is made for the project and archived for future reference.

There are no individual conservation plans for the cultural heritage attributes in the nominated property. A number of planned conservation works are listed in the nomination dossier. A reporting mechanism has been established for the nominated property. The daily maintenance activities and observations by the caretakers are recorded and archived. Any problems are reported to the National Heritage Preservation Agency of Kangwon Province or the Korean National Heritage Preservation Agency.

ICOMOS notes that the conservation measures in place are problem-solving orientated rather than values-based. The measures are pragmatic and effective, but ICOMOS considers that it would be desirable to develop a conservation plan for each of the key cultural heritage attributes that sets out the vision for their conservation as well as presentation, interpretation and monitoring. To assist this process, capacity building is a crucial element, particularly for the caretakers.

Monitoring

The monitoring arrangements for the cultural and natural heritage attributes are outlined in the nomination dossier and are based on daily maintenance by the caretakers. Assistance can be obtained for labour-intensive works or large-scale environmental improvements during the national heritage protection months.

Condition surveys are performed by provincial experts every six months and by experts from the state level annually. Major issues are addressed by conservation projects based on the annual condition survey.

While ICOMOS considers that the monitoring system is robust and practical, the indicators are very briefly described and could be further developed in order to identify and track trends for management.

ICOMOS considers that the documentation of the cultural heritage attributes of the nominated property is adequate and useful for establishing baseline information for monitoring. A research plan for the nominated property should be developed, including the priorities and methods for archaeological research. The arrangements for conservation of the cultural heritage attributes are practical and effective, but could be further developed to provide a stronger ability to identify trends in the state of

conservation and emerging pressures. ICOMOS recommends that conservation plans be developed for the most significant cultural heritage sites, and that conservation policies are developed for the wooden structures. Further development of the monitoring system should be adapted for easy integration of its outcomes into the Periodic Reporting questionnaire.

5 Protection and management

Legal protection

The main laws governing the protection and management of the nominated property are the Law of the Democratic People's Republic of Korea on the Protection of Cultural Heritage (amended and supplemented in 2018) and the Law of the Democratic People's Republic of Korea on the Protection of Scenic Spots and Natural Monuments (amended and supplemented in 2018). There are other laws that also apply, such as the Law of the Democratic People's Republic of Korea on Land (amended in 1999), Law of the Democratic People's Republic of Korea on Nature Reserves (amended and supplemented in 2013), Law of the Democratic People's Republic of Korea on the Conservation of Environment (amended and supplemented in 2014), Forestry Law of the Democratic People's Republic of Korea (amended and supplemented in 2015), Law of the Democratic People's Republic of Korea on Urban Management (amended and supplemented in 2015) and Law of the Democratic People's Republic of Korea on the Prevention of Marine Pollution (amended and supplemented in 2014). Protective designations also apply to the Mount Kumgang Biosphere Reserve and the Mount Kumgang Natural Park, and there are specific designations for certain plants, animals and geological monuments.

In the Democratic People's Republic of Korea, all cultural heritage sites are owned by the state, and all of the significant cultural heritage sites located within the nominated property are listed on the national register as either National Treasures or Preservation Heritage sites.-All of these are located in component part 001. There is also one protective designation for intangible cultural heritage associated with the nominated property (Mount Kumgang Legend). The assessment of cultural and natural heritage is done by the non-standing assessment and evaluation committees of the state in the field of tangible, intangible and natural heritage and endorsed by the Cabinet. The legal protection is strictly enforced.

The cultural heritage attributes within the nominated property are legally protected by two layers. The first is the legal provisions conferred to the nominated property as a whole that protect both natural and cultural heritage, scenic spots, ecosystems, geological features and the environment. The second layer is the protection afforded to cultural heritage sites listed on the national register. Not all historical attributes are individually protected in this way. For example, at the Anyang Hermitage, part of the three stone Buddha reliefs has been registered as a National Treasure, but the hermitage site associated with it has not. Attributes contributing to the value of a heritage site should

be included in the protection area, such as the geomancy features of the temples and hermitages.

ICOMOS also notes the national systems in place for the safeguarding of intangible cultural heritage that contribute to the overall protection of the cultural heritage values of the nominated property.

While there are legal provisions for Environmental Impact Assessment, there are no explicit legal frameworks in place for Heritage Impact Assessment. Additional information received in November 2024 confirmed that the National Authority for the Protection of Cultural Heritage (NAPCH) will conduct heritage impact assessments to be incorporated into environmental impact assessment procedures.

ICOMOS considers that the legal protection for the cultural heritage attributes is adequate, although current work to complete the inventories and national registration of the historic paths and trails and stone carvings should continue. In additional information received in November 2024 and February 2025, the State Party advised that this process is underway, and that all these potential attributes will be able to be protected by the national law once it is completed.

Management system

The management system is the responsibility of the Cabinet and the National Authority for the Protection of Cultural Heritage (NAPCH). Since the nomination was submitted, the State Party has changed the status of the NAPCH to the same level as the Ministry of Culture. The NAPCH is responsible for the protection of both tangible and intangible cultural heritage, and both natural and cultural heritage, enabling cultural and natural heritage to be coherently administered. ICOMOS considers that the unified management of both natural and cultural heritage under a single administration is a strength for the management system.

At the national level, the nominated property is also managed by the Pirobong Mount Kumgang Tourism Administration (PKTA). The PKTA was established in 2008 to revitalise tourism to Mount Kumgang. It manages the most visited tourist attractions including the Outer Kumgang part of Outer Kumgang-Inner Kumgang area (component part 001), Samil Lagoon of Sea Kumgang (component part 002) and Haemanmulsang area of the Sea Kumgang (component part 003). It encompasses the Mount Kumgang Tourism Management Committee, Mount Kumgang Tourism Facilities Maintenance Office, Mount Kumgang Tourism Service Station and Mount Kumgang Tourism Agency.

The Mount Kumgang Tourism Management Committee is responsible for planning and management, monitoring, business management and environmental protection, as well as infrastructure, catering and accommodation, and tour guides. However, the protection and management of the heritage values of the nominated property is guided by

the NAPCH, and it must approve projects proposed by

In the additional information received in November 2024, the State Party clarified that the Buddhist Federation of Korea closely cooperates with relevant institutions responsible for protection and management of the national heritage.

The Inner Kumgang area (component part 001) and the Chongsokjong Area in Sea Kumgang (component part 004) are managed by the Department of Culture, Kangwon Province People's Committee under NAPCH. There are Maintenance Offices for the scenic spots for each of these component parts.

The buffer zone is monitored and managed by the respective local authorities (the People's Committees of Kosong, Kumgang and Thongchon counties).

The management plan has been developed based on interministry consultation and was endorsed by the Cabinet. It is considered to be a legal document to be implemented by all the competent authorities.

The management plan outlines actions and projects for the period 2021-2030, although priorities are generally set by the annual condition survey and process for approval of the list of priority projects.

Visitor management

The Democratic People's Republic of Korea has not yet reopened to international visitors following the COVID-19 pandemic. Prior to the border closures, the average annual number of visitors to the nominated property was 5,018. It is expected that international visitor numbers will increase if the nominated property is inscribed in the World Heritage List. The State Party has advised that, if needed, the numbers will be controlled through ticketing and admission measures to ensure that the levels of visitation do not have negative impacts.

From the early 2000s, international visitors were able to travel to Mount Kumgang and some tourist hotels were built in the vicinity in a joint venture with South Korean entities. These facilities were taken over by the government of the Democratic People's Republic of Korea in 2011, but the State Party is planning for new developments that will better meet current tourism trends.

Tourism facilities are currently provided at the main entry areas of Outer Kumgang-Inner Kumgang (001), Samil Lagoon (002), Haemanmulsang (003), and Chongsokjong (004), including car parking, ticket office, toilets, site map, seats and signboards. All visitors must be accompanied by guides, including Buddhists who visit for religious purposes. The maximum number of tourists in a tour group is fifty. The tour guides are responsible for the safety of the visitors and for the provision of information. Restaurants are located in the Outer Kumgang area (001) and Samil Lagoon area (002), although they are not currently operating. There are also some accommodation

facilities, but they are also currently closed. Minimal toilets and waste bins are provided on the trails.

The Pirobong Mount Kumgang Tourism Administration and State Design Administration are planning initiatives to promote tourism development in the area, based on a Tourism Development Plan and Tourism Action Plan. The Tourism Action Plan sets out principles and activities for the period 2021-2030 and underpins the Tourism Development Plan.

According to the additional information received in November 2024 and February 2025 (including a map showing key locations), the development of the Kalma Coastal Tourist Area is in progress and future plans include: a sector for mountaineering, trekking and sightseeing; a sector for coastal tourism at Kosong port, including sea-bathing; a sector for sport and cultural services (including exhibitions and folklore); and a Sea Kumgang coastal park. There are also plans to upgrade trails and provide additional sanitary and waste collection facilities within the nominated property, and upgrade existing buildings in the villages in the buffer zone of the Inner Kumgang Area for receiving tourists. Extant housing and service facilities for local inhabitants within the nominated property are foreseen to be improved adopting where possible traditional architectural design: and tourism buildings in the Outer Kumgang area will be relocated to the buffer zone. The State Party has advised that Heritage Impact Assessments will be conducted for these projects. ICOMOS notes the cautious approach to tourism development planning and emphasises the need for Heritage Impact Assessments for new projects.

The roads and railway from Pyongyang to Wonsan (the provincial capital), the road between Wonsan and Mount Kumgang, and the Wonsan airport will be upgraded to improve accessibility, and a sea route to the nominated property will be established. There is no timeframe for the completion of these plans.

Currently, interpretation consists of information on a website (for ticketing), signboards, and stories told by tour guides. The website is being upgraded but is only accessible from within the country, although there are plans to open it to international users. On-site interpretation will be completed by 2025.

There is no current interpretation plan, although the State Party has indicated that this will be developed by the National Authority for the Protection of Cultural Heritage in collaboration with the Academy of Social Sciences and Kim II Sung University. Information for interpretation is based on the twelve-volume *Encyclopaedia of Mount Kumgang*, published in 2002. It includes many stories, anecdotes and legends, as well as the history of Mount Kumgang.

Additional information about planned interpretation actions was received in February 2025, including a list of planned additions to the interpretation provided at the nominated component parts. ICOMOS has noted these

and further recommends that an interpretation plan be developed which is based in the first instance on the Outstanding Universal Value of the nominated property. All interpretation installations and works will need to be subject to Heritage Impact Assessments prior to commencement.

Community involvement

The areas surrounding the nominated property are populated by farming communities, and there are schools, state-supported NGOs, and state-owned enterprises that are also considered within the wide definition of communities. The People's Committees of Kosong County (the local governing body of the Outer Kumgang area) and Kumgang County (the local governing body of the Inner Kumgang area) contribute to various government-organised activities such as planting trees, cleaning litter, repairing embankments, improving water quality from the upstream, preventing landslides, insect attacks and forest fires.

National policy has defined heritage conservation as a patriotic undertaking that involves the entire nation. Each April and November (the two months with the least farming demand) are dedicated as National Heritage Protection Months. In these two months, farmers and other communities are organised to undertake heritage protection activities, such as maintenance of infrastructure and historical settings, reforestation to protect natural heritage, cleaning the cultural sites and natural environment and maintaining firebreak zones.

According to these arrangements, community engagement in the World Heritage nomination process and conservation of the nominated property is mandatory and includes all individuals associated with the nominated property. Additional information received in November 2024 provided details of the community participation in the nomination process, including contributions from older local inhabitants, guides and students. ICOMOS notes that there is general support for the nomination, and expectations that tourism development associated with World Heritage inscription will bring benefits to the local areas.

In the additional information received in November 2024, the State Party acknowledged that Buddhism is not as prevalent as it was in the past. Buddhist practices resumed at Mount Kumgang in 1989. Since then, events have been organised by the Buddhist Federation of Korea. There is a desire by many Koreans to visit Mount Kumgang at least once in their lives.

In additional information received in February 2025, the State Party explained that Buddhist ceremonies include memorial services and meetings at Singye, Phyohun and Jongyang temples every year to mark Buddha's birthday (lunar 8 April), Buddha's attainment of Great Wisdom (lunar 8 December) and Buddha's Nirvana (lunar 15 February). At Singye Temple, the practices include the inaugural ceremony.

According to the State Party, there are local priests and Buddhist practitioners in nearby communities. Lay believers provide services to the three living temples, such as cleaning and maintenance, and management of crowds during events and festival periods. The State Party states that these communities were involved in the preparation of the nomination and gave their consent. The State Party has confirmed that there are no factors that could impede continuing Buddhist practices in the nominated property.

Effectiveness of the protection and management of the nominated property

In summary, ICOMOS considers that the legal protection and the management system are appropriate, and that the management plan provides useful guidance for management actions. Continuing Buddhist practices are supported, and the system of local caretakers is an important element of the management system, requiring additional capacity building. Some recommendations have been provided to further develop strategies and plans for sustainable tourism and interpretation.

6 Conclusion

Mount Kumgang — Diamond Mountain from the Sea (Democratic People's Republic of Korea) is a sacred mountain and associative cultural landscape which is nominated as a mixed serial property of four component parts. The justification presented for the cultural criteria focuses on the Buddhist temples and hermitage sites dating from the 6th-20th centuries, as well as named natural elements and views, pagodas, steles, stupas, stone lanterns and sculptures, stone calligraphy, and associations with the intangible cultural heritage of Korean mountain Buddhism which is intertwined with Taoism and with local spiritual beliefs. Mount Kumgang has been a place of pilgrimage for centuries, and the scenic beauty has been an inspiration for artists and poets.

ICOMOS considers that the Outstanding Universal Value of the nominated serial property has been demonstrated according to criterion (iii) for component parts 001 and 002, but that component parts 003 and 004 should be excluded because there are insufficient attributes relevant to the proposed Outstanding Universal Value in those areas. Although ICOMOS considers that criterion (vi) could also be applied, the State Party has explained that these aspects have been included in its justification for criterion (iii). The boundaries for component parts 001 and 002 are appropriate for the purposes of incorporating the cultural heritage attributes, and these two component parts meet the requirements for integrity and authenticity. In view of the nomination of the property as a mixed property, ICOMOS also notes the need to harmonise the selection of component parts and the crafting of the draft Statement of Outstanding Universal Value with the consideration of the natural heritage values which are being evaluated by IUCN.

ICOMOS acknowledges the efforts made by the State Party to elaborate the nomination dossier, and its positive responses to further recommendations and suggestions from ICOMOS during the course of the evaluation process. These have enabled the significance of Mount Kumgang to be more clearly understood.

The legal frameworks provide adequate protection to the cultural heritage values of the nominated property, and ICOMOS considers that the management of the potential mixed property is well-supported by the incorporation of both natural and cultural heritage within the responsibilities of the National Authority for the Protection of Cultural Heritage (NAPCH). The attributes are well-maintained, and the state of conservation is generally good. The involvement of local caretakers is considered to be a strength of the management system, as is the State Party's commitment to supporting continuing Buddhist practices through the Buddhist Federation of Korea and lay practitioners.

The State Party has appropriately identified the future threats and incorporated them into the policies and actions in the management plan. The oldest timber structures are vulnerable, and some additional recommendations have been provided to support their authenticity and protection. Additional tourism developments within the wider setting are planned, and some recommendations have been provided to ensure that these occur in ways that are compatible with the Outstanding Universal Value and offer benefits to local communities.

7 Recommendations

ICOMOS recommends that the World Heritage Committee adopts the following draft recommendations, noting that this will be harmonised as appropriate with the draft recommendations of IUCN regarding their evaluation of this mixed property under the relevant criteria and included in the working document WHC/25/47.COM/8B.

Recommendations with respect to inscription

ICOMOS recommends that the Mount Kumgang – Diamond Mountain from the Sea, Democratic People's Republic of Korea, with the exception of component part 003 (Haemanmulsang Area in Sea Kumgang) and component part 004 (Chongsokjong Area in Sea Kumgang), be inscribed, as a cultural landscape, on the World Heritage List on the basis of cultural **criterion (iii)**.

Recommended Statement of Outstanding Universal Value

Brief synthesis

Mount Kumgang is an associative cultural landscape where there is a complex and intertwined relationship between the distinctive landforms and scenery, and the long history of Buddhism, pilgrimage and traditions of mountain worship in the Korean peninsula. As the eastern guardian of the Buddhist realm, the serial property of two component parts demonstrates exceptional aspects of

Korean mountain Buddhist culture over many centuries, and is a place that many Buddhists aspire to visit within their lifetimes.

The landscape setting of steep granite peaks, rock formations, waterfalls and pools are integral to the long traditions of Buddhist pilgrimage, and the many famed literary and artistic representations of Mount Kumgang. The intangible cultural heritage of this landscape is further reflected in the naming of key features, poems and folk tales.

Buddhist hermitages date from the 5th century, and some of the very earliest remaining examples are found within the Outer Kumgang-Inner Kumgang Area component part (001). Temples, pagodas, steles, stupas, sculptures and stone lanterns attest to the sequence of development of Korean mountain Buddhism. The property also features significant examples of carved calligraphy and historic trails to famed scenic viewpoints. Some of the cultural heritage attributes also contain evidence of the intermingling of Buddhism with Taoism and local spirituality, such as mountain gods, the Great Bear, and wild animals. Three of the temples within the Outer Kumgang-Inner Kumgang Area component part (001) are continuing places of Buddhist practices.

Criterion (iii): Mount Kumgang is a sacred mountain and bears an exceptional testimony to Korean mountain Buddhism traditions from the 5th century CE to the present. The traditions and practices of Buddhism over many hundreds of years and the historical role of Mount Kumgang as a major place are central to the Outstanding Universal Value of the property and demonstrate the ways in which the natural and cultural heritage attributes are intertwined. The extant temples, hermitages, stupas and stone engravings demonstrate these characteristics, in addition to the many songs, poems and artworks inspired by Mount Kumgang. The built attributes, together with continuing Buddhist practices and other associated intangible cultural heritage aspects demonstrate an exceptional inter-relationship between the tangible, intangible and scenic attributes of the associative cultural landscape.

Integrity

The property contains the cultural heritage attributes required to demonstrate the Outstanding Universal Value. The substantial area enclosed by the boundaries is appropriate and provides sufficient protection of the cultural heritage attributes and the associative cultural landscape. The large buffer zone provides an added layer of protection, particularly against visual impacts on the integrity of the cultural landscape, and for the cultural meaning and importance of scenic locations and lookouts. The cultural heritage attributes are well-maintained with minimal threats, including those natural elements that can be considered to be attributes of the cultural landscape. Appropriate policies and management arrangements are in place to mitigate potential future threats from visitor pressures and tourism development.

Authenticity

The authenticity of the property has been established on the basis of the condition of the historic temples and other Buddhist elements (stone carvings, steles, sculptures and pagodas), archaeological sites, key natural features, and historical paths. Wooden structures such as the Phyohun Temple, Jongyang Temple, Podok Hermitage, Pulji Hermitage, and Chilsong Shrine of Mahayon Buddhist School site exhibit a high degree of authenticity in relation to the Outstanding Universal Value, although they are vulnerable due to their fragile materials, the need for continuing cultural knowledge and the need for ongoing conservation and maintenance. These structures are part of continuing Buddhist practices that contribute to the Outstanding Universal Value of the cultural landscape. While there are satisfactory conservation policies in place, the overall authenticity of the timber buildings and their tanchong (polychrome schemes) varies due to these factors, as well as the impacts of past damages. Conservation plans for the temples is recommended in order to further secure their authenticity and state of conservation.

Protection and management requirements

The legal protection of the property is ensured by the Law of the Democratic People's Republic of Korea on the Protection of Cultural Heritage (amended and supplemented in 2018) and the Law of the Democratic People's Republic of Korea on the Protection of Scenic Spots and Natural Monuments (amended and supplemented in 2018). There are other laws that also apply to aspects of the property. Protective designations also apply to the Mount Kumgang Biosphere Reserve and the Mount Kumgang Natural Park. A number of the individually significant cultural heritage sites within the property are listed on the national register as either National Treasures or Preservation Heritage sites. There is also one protective designation for intangible cultural heritage associated with the property (Mount Kumgang Legend). The property is owned by the State.

While there are legal provisions for Environmental Impact Assessment, there are no explicit legal frameworks in place for Heritage Impact Assessment. The National Authority for the Protection of Cultural Heritage (NAPCH) conducts heritage impact assessments for developments within and near the property.

The management system is the responsibility of the Cabinet and the NAPCH. The NAPCH is responsible for the protection of both tangible and intangible cultural heritage, and both natural and cultural heritage, enabling cultural and natural heritage to be coherently administered. An adequate monitoring system has been established, and a management plan (2021-2030) is in place, including an action plan for its implementation. Day to day management and maintenance of the property is provided by local caretakers. The Buddhist Federation of Korea closely cooperates with relevant institutions responsible for the protection and management of the property. The buffer zone is monitored and managed by the respective local

authorities (the People's Committees of Kosong, Kumgang and Thongchon counties).

The Mount Kumgang Tourism Development Plan elaborates the directions for future tourism development, based on the policy framework of the management plan.

Additional recommendations

ICOMOS further recommends that the State Party give consideration to the following:

- a) Developing conservation plans for the key cultural heritage attributes that sets out the vision for their conservation as well as presentation, interpretation and monitoring,
- Developing conservation policies and plans for the wooden structures to ensure the retention of their authenticity,
- c) Completing the inventory and assessment of the stone carvings found in the property in order to enable their inclusion in the national register,
- Finalising the evaluation of the significance of the historic trails and paths within the property and including those of national significance in the national register,
- Reviewing the registered boundaries of the temples and hermitages in the national register, taking into consideration the underlying geomancy of their locations and siting,
- f) Developing a cultural heritage research plan for the property, including archaeological surveys, non-invasive studies and excavations within the component parts,
- g) Implementing Heritage Impact Assessment for development proposals (such as for tourism, visitor infrastructure, interpretation and site management infrastructure), and considering the best way to effectively incorporate Heritage Impact Assessment into relevant legal frameworks,
- Further developing the Mount Kumgang Tourism
 Development Plan to address additional sustainable tourism issues, including consideration of group sizes and mechanisms for protecting fragile cultural heritage attributes,
- Developing a values-centred interpretation plan based on the Outstanding Universal Value of the property, ensuring that all new installations and works are preceded by Heritage Impact Assessments,
- j) Undertaking capacity-building programme and activities with caretakers,

 k) Supporting the continuing traditions of Buddhist practice at the Buddhist temples and other sites within the property.



Map showing the boundaries of the nominated component parts