WORLD HERITAGE COMMITTEE DISTRACTED BY VICTORIA FALLS DAM DEVELOPMENT

- Concerns over tourism development pressures drowned out by discussion over Batoka Gorge Hydro-Electric Scheme

- South Africa successfully propose amendments diluting Committee decision

- Committee diverted from recommendations from Reactive Monitoring Mission

Keep Victoria Falls Wild, 25th September 2023

The World Heritage Committee at its 45th Conference Session, held at Riyadh in the Kingdom of Saudi Arabia over 10th-25th September 2023, turned its attention to issues affecting the Victoria Falls World Heritage Site (VFWHS) in a discussion held on 13th September (available to view on the UNESCO World Heritage website here (1:52:10 to 2:33:25)).

Members of the Committee discussed the draft decision text prepared by the World Heritage Centre and IUCN (UNESCO, July 2023) and amendments to the text which were proposed by the South African delegation (UNESCO, August 2023). Both South Africa and Zambia are currently members of the Committee.

In adopting the proposed amendments the World Heritage Committee have ignored the advice of the World Heritage Centre and IUCN, including the recommendations of their own Reactive Monitoring Mission to the Site (UNESCO, June 2023) and diluted measures aimed at protecting the Site from a wave of tourism developments currently proposed by the State Party of Zimbabwe, including several developments which have already been constructed within the Highly Ecologically Sensitive Zone - which is supposed to prevent all new infrastructure development (KVFW February 2023, August 2023, September 2023).

Opening Statements from the World Heritage Centre and IUCN

Before the Committee debated the proposed amendments, overview statements were presented by the World Heritage Centre Secretariat highlighting direct threats to the Site from the Batoka Gorge Hydro Electric Scheme (BGHES).

"On the issue of the Batoka Gorge Hydro Electric Scheme which is referred in

paragraph 4 - we would like to note that following review of the documentations from the State Parties, the WHC and IUCN have assessed that the reservoir area of the electric scheme will extend approximately 10.75 km into the property at full supply level which at deepest point will increase the water level in the property by around 43 m. During the dry season it is reported that the reservoir level will be lowered, which will reduced the flooded area by 5 km. This means that during the dry season still 5.75 km of the gorge inside the property will remain with the higher water level.

"The project will therefore alter the unique gorge ecosystem and water flow and could potentially impact on the ecological values of the property as defined in its statement of OUV.

"The World Heritage Centre therefore considers that the property should not proceed as currently proposed but should be further revised together with the Environmental Impact Assessment to assess alternative project designs that would avoid these impacts on the property and include a comprehensive ecological assessment of the gorge ecosystem."

A statement from the IUCN representative highlighted increasing tourism development threats to the Site.

"The property faces serious threats from individual and cumulative infrastructure developments associated with tourism. IUCN and the World Heritage Centre recall past committee requests to the State Party of Zambia to halt the Mosi-oa-Tunya Livingstone Resort development. However, as now confirmed by the State Party of Zambia the resort hotel was completed and has been open for business.

"Other tourism developments have also been reported in Zimbabwe within the areas of the property that are recognised as highly sensitive zones according the Joint Integrated Management Plan.

"This concern is further compounded by inconsistent property boundaries that are used in different documentations creating confusions as to what is and is not inside the property boundaries.

"Other inconsistencies are also seen in permitted and prohibited activities and developments which appear to differ between the management plan for National Parks, which the property overlap with, and the JIMP for the property.

"IUCN and the WHC consider that it would be value to determine development areas and criteria that ensure the protection of the OUV of the property. A detailed plan that

prescribes where, what and how constructions can take place in and around the property would become the blueprint for development to allow the State Parties to map out areas where construction could take place based on clear criteria and areas which should be considered free from development."

Batoka Gorge Hydro-Electric Scheme

The Committee's concerns mainly focussed on the proposed Batoka Gorge Hydro-Electric Scheme (BGHES), jointly proposed by the State Parties of Zambia and Zimbabwe, and potential impacts of the project on the Outstanding Universal Values (OUV) of the VFWHS, which includes a section of the gorges extending some 12 km downstream as well as the Falls themselves and a section the river extending some 15 km upstream.

In their statement on their proposed amendments the representative for South Africa informed the Committee:

"The State Party of Zambia has taken utmost care to avoid any possible impacts on the OUV through the selection of an alternative that has no likelihood of undermining the integrity of the site. The chosen alternative clearly shows the tail of the backflow of the reservoir waters will only be located in gorges, with a potential water level rise of only 25% maximum, and as such no flooding of the gorges. And therefore no negative impact on the attributes of the OUV."

The statement appears to contradict itself by saying the backflow will include the gorges (within the WHS) but that there will be *"no flooding of the gorges,"* and the claimed *"potential water level rise of only 25% maximum"* appears to make limited sense without further context. The suggested amendments removed a World Heritage Centre request *"to assess alternative project designs that will not impact the OUV."*

The amendments also significantly changed the request for a comprehensive ecological assessment of the project's impact on gorge ecosystem environment, instead placing the emphasis on a geomorphological and/or geological assessment.

A detailed ecological study of the gorge ecosystems is essential if the impacts of this development are to be understood. For example the fish communities of the middle Zambezi River system reflect not only the fast-flowing rapids of the gorge system but also a complex regional geomorphological history of major river course

changes and river captures, with the Victoria Falls acting as a geographical barrier to the movement of fish and resulting in geographically isolated fish communities downstream of the Falls. Geomorphological evidence has resulted in several theories on the time-scales in the evolution of the Falls and gorge system and the study of comparative fish faunas and species clines has helped refine these theories (Kramer and Van der Bank, 2011). There is still potentially much more that can be learned from the study of the unique fish communities of the Batoka Gorge before they are lost under the waters of the BGHES. It should be noted that the gorge systems of the middle Zambezi downstream are already significantly affected by the Kariba Dam, and that the BGHES will not only affect the natural river-flow above the dam, but also downstream, effectively modifying the remaining natural sections of the gorge environments.

An alternative location, in the Devil's Gorge, downstream from the Batoka Gorge and above Kariba, would at least leave the Batoka Gorge as a last natural example of the once extensive gorge ecosystems.

Tourism Development Pressures

The amendments proposed by South Africa also included dilution of recommendations relating to increasing tourism pressures in and around the WHS.

> *"In respect to paragraph 5 Chairperson, we would like to draw attention of the committee to a Joint Integrated Management Plan developed by the two State Parties and we believe the plan will be an important tool to guide future developments in and around the property."*

While it is true that there is a Joint Integrated Management Plan (JIMP) for the Site, the current document was presented in 2016 and is urgent need of review (State Parties, 2016). The request of the World Heritage Centre comes following shortcomings and inconsistencies in this document and in direct response to several tourism development projects which have proceeded within the Highly Ecologically Sensitive Zone - which prevents all new infrastructure development - notably the Baines Restaurant and 'Rock Pool' development on the south bank immediately above the Falls, both developed over 2022 (KVFW, August 2023).

The amendment removes a request to the State Parties to *"produce a blueprint for infrastructure development in and around the property that ensures the protection of the property's OUV and to not approve any further developments until the blueprint is finalized and submitted to the World Heritage Centre, together with an impact assessment for each proposed project."*

Instead the amended text shifts emphasis onto the forthcoming review and update of the JIMP, with no specific requirement to suspend approval of further developments until this document is agreed and finalised.

> *"Requests the States Parties to prioritize the review and update of the Joint Integrated Management Plan (JIMP) to ensure that necessary safeguards and thresholds are incorporated to mitigate against development pressures for the protection of the property's OUV and further requests the State Parties adhere to the new Guidance and Toolkit for Impact Assessments in a World Heritage Context, prior to taking any decision that is difficult to reverse;"*

In removing this specific request from the text prepared by the World Heritage Centre the Committee has chosen to ignore the wave of tourism development projects which currently threaten the Site and the evident failure of the existing JIMP document - and the State Parties - to contain these development pressures.

The Mosi-oa-Tunya Resort Development

Amendments were also proposed to the text relating to the controversial Mosi-ou-Tunya Resort development, updating the text to reflect the fact that the development was now completed and operational, being opened in December 2022 under the management of Radisson Blu (KVFW, August 2023).

> *"Regrets that the construction of the Mosi-oa-Tunya Livingstone Resort Hotel has concluded despite the Committee's request to halt further activities and urgently requests the State Party of Zambia to implement mitigatory measures integral to legal conditions of approval issued by Zambian Environmental Management Authority and contained in the Joint Integrated Management Plan (JIMP), the ESIA has been revised in accordance with the new Guidance and Toolkit for Impact Assessments in a World Heritage Context and a comprehensive Environmental and Social Management Plan has been developed and submitted together with impact assessments to the World Heritage Centre;"*

We wait to see what 'mitigatory measures integral to legal conditions of approval' are to be implemented by the State Party of Zambia in relation to this development. The World Heritage Centre/IUCN joint Reactive Mission report (UNESCO, June 2023) highlighted several significant discrepancies in relation to the project's construction and infringement of the development guidelines as approved by the Zambian Environmental Management Agency (ZEMA), including construction and

landscaping within the protected 50m riverside zone and construction of a four-floor main building as opposed to the three-floor structure outlined in the ESIA and approved by ZEMA.

Ecology or Geology?

The Committee then discussed and considered the various amendments, with the Japanese delegates, in particular, raising concerns over the shift of emphasis away from protecting the ecological aspects of the site towards a sole focus on geological or geomorphological features.

In a statement from the Zambian delegation in relation to the controversial Mosi-oa-Tunya Resort development this emphasis was again evident:

> *"Whilst noting and generally appreciating the concerns of the IUCN, the Committee and the Centre, it is important to note that the MoT Radisson Blu hotel project development, which is 4 km away from the lip of the Falls or the Falls itself, is upstream of the main falls and it is largely in the area which is known as a buffer zone - I am using the word, um, err, err, lightly - implying that it is not impacting on the views and the geomorphological processes and features of the site...*
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> *"In this case you find that for instance that the OUV for the Victoria Falls is based on geomorphological features and processes, and when you look at the assessments they are emphasising on ecological assessment, which is a wrong judgement, because as the two state parties we should be judged on the geomorphological features and processes rather than the biological aspects...*
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> *"And when it comes to the BGHES the impact will be felt 2 kilometres downstream of the main falls, meaning the linear distance, which in terms of the OUV - this site for its beauty - so we feel that this will not really impact the values as it is being projected."*

The comments clearly show how the State Parties of Zambia and Zimbabwe perceive the Victoria Falls World Heritage Site as simply a geomorphological feature, and are keen to ignore and demote the importance of its ecological values.

The Adopted Text

Despite the issues raised in the joint World Heritage Centre/IUCN Reactive Monitoring mission report, opening statements from the World Heritage Centre and

IUCN and concerns raised by the Japanese delegation, the Committee adopted the amendments suggested by South Africa, undermining efforts of their own advisory bodies to improve the protection of the Site.

The amendments effectively remove all the recommendations resulting from their own Reactive Monitoring Mission to the Site, undertaken in February 2022 (UNESCO, June 2023).

This World Heritage Site is on a collision course between conservation management and tourism development, and the State Parties appear to be encouraging development and revenue generation over the conservation and preservation of this natural wonder. There is an urgent need for the World Heritage Centre and IUCN to review current developments at the Site before further negative impacts and for the World Heritage Committee to recognise the threats to this Site.

References

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