WORLD HERITAGE WATCH

World Heritage Watch Report 2026









World Heritage Watch

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Berlin 2026

Bibliographical Information

World Heritage Watch: World Heritage Watch Report 2026. Berlin 2026
232 pages with 194 photos, 75 graphics and 41 maps in 58 contributions
Published by World Heritage Watch e.V.

Berlin 2026
ISBN 978-3-00-087347-8
NE: World Heritage Watch
1. World Heritage 2. Civil Society 3. UNESCO 4. Heritage at Risk 5. Natural Heritage 6. Cultural Heritage
7. Historic Cities 8. Sites 9. Monuments 10. Cultural Landscapes 11. Indigenous Peoples 12. Participation

World Heritage Watch

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Produced with support from
Naturschutzbund Deutschland e.V. (NABU)

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Back cover map: Martin Lenk

Cover Design: Bianka Gericke www.layoutmanufaktur.de
Design and layout: Bianka Gericke www.layoutmanufaktur.de
Printed by Buch- und Offsetdruckerei H. Heenemann GmbH & Co. KG, Berlin

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Preface

The year that has passed since the publication of the WHW Report 2025 has presented the world with enormous new challenges that affect virtually all of us, directly or indirectly – including us as a small NGO and global network.

Despite some setbacks and obstacles, however, we have once again succeeded in producing a WHW Report that is even more comprehensive than all previous editions. This demonstrates, on the one hand, that the problems affecting World Heritage have not diminished; on the other hand, it also shows that the commitment of people all over the world – even in the most remote regions – to preserving our shared heritage has not waned, even as conditions have become increasingly difficult. The twelfth edition of this report is therefore also a testament to the fact that the idea of viewing humanity's heritage as an object of shared responsibility can bring together people of diverse origins, ethnicities, and religions. Beyond all individual problems, this is the value of the World Heritage Convention that we should always keep in mind.

We are also united by the view that cultural heritage should not be co-opted for political purposes or ideologies. We preserve it to learn how our ancestors lived in the past, what they believed in, what they found beautiful, and, more generally, what moved them – because we stand at the present-day end of a cultural evolution that traces its roots back to this heritage. It therefore also offers an element of continuity, reassurance, and stability in a world that is changing ever more rapidly.

Since the destruction of World Heritage sites in Iraq and Syria by the terrorist organization "Islamic State," the global public has repeatedly reacted to the destruction of cultural heritage due to armed conflicts – in Ukraine, in Gaza, to a lesser extent in Sudan, and most recently in Iran and Lebanon. There is also a growing realization within international organizations that built cultural heritage and museum objects cannot be protected by international treaties such as the World Heritage Convention if individual powers decide not to abide by treaties to which they themselves have acceded and which they have committed to uphold vis-à-vis the other member states. Ultimately, there is no protection against attacks with missiles and drones, and it is a positive sign that ever-wider circles of established actors are acknowledging this reality. This presents an opportunity to address the shortcomings of multilateralism – brilliantly laid bare in a recent speech by Canadian Prime Minister Mark Carney – and to develop more effective and equitable instruments of international cooperation.

However, alongside the destruction caused by war, the creeping loss of the world's natural and cultural heritage due to monstrous infrastructure projects and the boundless growth of tourism receives far too little public attention. These negative trends are repeatedly countered - though with diminishing credibility - by the image of World Heritage sites where the world still seems to be in order. Instead of using World Heritage sites as a model for setting sensible limits on tourism, however, more and more sites are being devalued into mere backdrops of only apparent authenticity. In this context, it remains to be seen what consequences the recently agreed-upon collaboration between UNESCO and TUI Travel, the world's largest travel agency, will have.

In a rapidly industrializing world, growing energy demand is giving rise to new threats, stemming both from the extraction of fossil fuels such as natural gas and coal and from renewable sources such as wind power. Five of the 57 sites covered in the new WHW Report deal with threats posed by LNG terminals, one with natural gas extraction via fracking, and three others with planned wind farms.

Particularly in the controversy surrounding wind turbines, the parties involved often find themselves in a bitter dispute that represents a classic conflict between two legitimate goals: the protection of nature, landscapes, and cultural heritage on the one hand, and climate protection on the other, both of which are supported by international law. Unfortunately, to our knowledge, there are still no generally applicable guidelines from UNESCO (i.e., the 196 member states) on how such conflicts of interest can be resolved.

We dare to assert that none of the problem areas described here can be resolved without much greater involvement of the general public. Yet an opposite development is being observed: in an increasing number of countries, civil society's scope for action is being curtailed or outright banned, and some are even attempting to exert influence on UNESCO in this regard. The new WHW Report reflects this reality: No fewer than six contributions had to be published anonymously or under a pseudonym, and several others were written from exile.

People are willing to stand up for World Heritage. This willingness must be awakened and fostered to a much greater extent, and to do so, it is necessary not only to educate people about the significance of each individual site, but also to make it much clearer that all sites inscribed on the World Heritage List – regardless of which country they are located in – are our shared heritage. This is a cosmopolitan idea in the best sense of the word and a cultural guidepost toward a global community to which we can all subscribe. We view our World Heritage Watch network as a contribution to this cause.

For the first time this year, we can report from Stonehenge and Rio's Sugarloaf Mountain that local civil society – with support from the Berlin WHW office – has prevented serious destruction. This is a great source of encouragement. However, to do more for our global network, we must build our capacities in a more sustainable way.

For over a decade, our small, utterly committed World Heritage Watch team in Berlin has largely worked pro bono. Yet, in order to grow, we also critically depend on the financial support and expertise of the civil society groups we serve, and of our supporters at large. We thank you for considering your support. Please visit our website www.world-heritage-wacth.org.

Berlin, May 2026

Maritta Koch-Weser, President
Stephan Doempke, Chair of the Board

I. Monuments and Sites

Devastating Road Scheme Across Stonehenge Landscape Permanently Cancelled

Kate Freeman, The Stonehenge Alliance



Fig. 1: Venus and Saturn, accompanied by a Crescent Moon, smile friendly over Stonehenge
Photo: Astronomy 365 @honeymalikk2 on X, 17 March 2026. The photo is authentic!

The UK Government planned a 4-lane highway across Stonehenge WHS, including a 3.3km tunnel that was too short to protect the 5.4km-wide prehistoric "landscape without parallel". The scheme was rejected by Government inspectors in 2020. UNESCO strongly objected, as did nearly a quarter of million petitioners from around the world. Government ignored all these objections.

Despite a successful legal challenge in 2020, the UK Government once again gave the scheme planning permission in 2023. The World Heritage Centre and ICOMOS remained implacably opposed to the scheme, but the World Heritage 46th Committee overturned the Draft Decision to inscribe the property on the List of World Heritage in Danger.

By the time the objectors' legal challenge was presented to the Supreme Court, the newly elected Labour Government cancelled the scheme on 29 July 2024 on grounds of affordability.

The Stonehenge Alliance celebrates

We breathed a huge sigh of relief that we had been able to hold out all that time but the problem remained that the scheme's planning permission lasted until August 2028.

In November 2025, Heidi Alexander, Secretary of State for Transport, consulted on revoking the scheme's planning permission. Despite objections from the local Highways Authority, the revocation was enacted on 18 March 2026.

Our Acting Chairman, Mike Birkin, told the press: "The WHS is a designation of an entire landscape that is full of prehistoric monuments of incalculable value. The granting of its planning permission was always perverse given the enormous damage it would have caused to the unique landscape of the Stonehenge World Heritage Site (WHS). The scheme was condemned by planning inspectors as well as UNESCO's experts yet the government at the time rode roughshod over the evidence."

The scheme's cancellation leaves untouched the issue of poor connectivity to the south west region of England and its degraded infrastructure which is notoriously unreliable and vulnerable to extreme weather events.

The planets are aligned, for now

For now, Stonehenge WHS is secure, but here is the worry: relying on the International World Heritage Convention alone to protect one of our country's premier WHSs has proven unreliable, showing that all such sites remain vulnerable to inappropriate development. We conclude that we need to ensure that WHSs in the UK enjoy the same legal security as Scheduled Monuments, National Nature Reserves, and National Parks under UK planning law. An All-Party Parliamentary Group dedicated to WHSs in the UK is investigating ways of strengthening their protection. Watch this space!

World Heritage Under Pressure: Endangered Buildings in Bad Ems and Bad Kissingen

Anonymous[1]

Four listed buildings in two German World Heritage cities are threatened by intrusive alterations, vacancy and deferred maintenance: the Badhaus and the upper station of the Malbergbahn in Bad Ems, and the Sanatorium Apolant and the Fürstenhof in Bad Kissingen. All four affect the Outstanding Universal Value (OUV) of the transnational serial World Heritage Site "Great Spa Towns of Europe."

Full documentation of each case is available on the Red List of the German Association for Art History: for Bad Ems[2] and for Bad Kissingen[3].

Bad Ems: Threatened heritage

The Badhaus (1845) and the Karlsburg

The Badhaus in Bad Ems, built in 1845, is a key monument of German Neoclassical spa architecture. Directly adjacent stands the Karlsburg (Haus Vier Türme), a Baroque town palace of 1696 in which the Ems Dispatch was signed in 1876; its roof structure was completely destroyed by fire on the night of 3 July 2024.



Fig. 1: The Badhaus with its recent vestibule obscuring and disfiguring its façade. Photo: the author

A large glazed vestibule has recently been erected directly in front of the main facade of the Badhaus. Its heavily green-tinted glass obscures more than half of the facade, depriving the historic building of its legibility in the streetscape. The city council approved the planning application in March 2025 on the explicit condition that the heritage authority and ICOMOS be consulted. Whether these reviews took place has not been publicly documented. Since April 2026, the Kurbrücke (1853/1948) has also been closed to the public due to severe corrosion damage. The built heritage of Bad Ems is thus under pressure at three points simultaneously, all within the World Heritage core zone.



Fig. 2: The vestibule in detail. Photo: the author

The Upper Station of the Malbergbahn (1887)

The Malbergbahn is Germany's oldest water-powered funicular railway. Since its closure in 1979 and designation as a technical monument in 1981, the upper station has been deteriorating steadily: broken windows, a failing roof, repeated vandalism. A sale to a private investor in 2019 produced no progress whatsoever. Only after the transaction was reversed could the

1 The author is known to, and can be contacted through, World Heritage Watch.

2 https://kunstgeschichte.org/verband/rote-liste/bad-ems-badhaus-malbergbahn

3 https://kunstgeschichte.org/verband/rote-liste/bad-kissingen-apolant-fuerstenhof



Fig. 3: View of the Upper Station of the Malbergbahn. Photo: the author

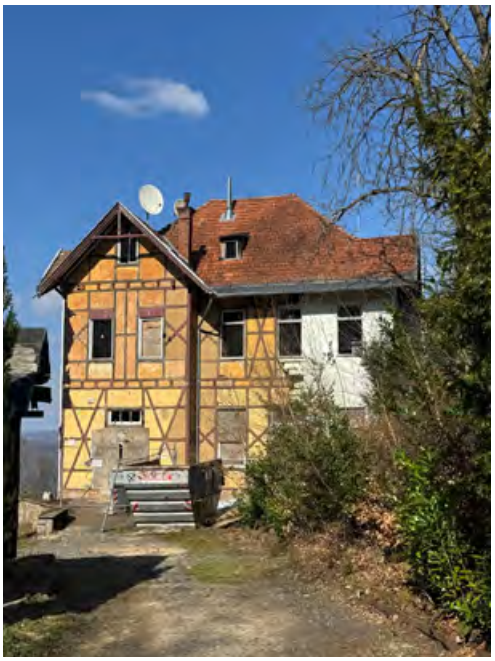


Fig. 4: The backside of the building. Photo: the author

Calc-Limax Foundation acquire the site in 2022 and begin initial securing works. The condition of the building remains precarious.

The exemplarily restored lower station, now operating as a café, demonstrates what is achievable – and makes all the more urgent the case for equivalent resources and attention for the upper station.

Bad Kissingen: Acute Endangerment

The Sanatorium Apolant (1906) – Former Jewish Spa Establishment

The Sanatorium Apolant, built in 1906 by Paul Schultze-Naumburg in a Baroque-inflected Jugendstil style, was one of Bad Kissingen's most prestigious spa establishments. Its founder, Dr Edgar Apolant, was a Berlin physician of Jewish descent. With the Nazi seizure of power, the persecution of the family began: Ella Apolant, the founder's sister, was deported to Theresienstadt in 1942 and died there in 1944. A Stolperstein in front of the building commemorates her.

After restitution and use as a rehabilitation facility until 1978, the complex has stood empty ever since. Nearly five decades of decay have caused partial structural collapse; the pavement alongside is closed due to falling masonry. All attempts at adaptive reuse have failed. Emergency stabilization measures ordered by the city are subject to legal challenge. The Apolant building is simultaneously a listed monument, a defining element of the townscape, and a central site of German-Jewish memory within the history of the European spa – its loss would be irreversible on multiple levels.



Fig. 5: The façade of the former Apolant house, already with visible signs of decay. Photo: Sigismund von Dobschütz via Wikimedia commons, 2012



Fig. 6: Damaged facade of an annex of the Apolant house. Photo: anonymous, 2026



Fig. 7: The garden and backside of the building are barricaded and inaccessible Photo: anonymous, 2026

The Fürstenhof – "Zuckerschlösschen" (1856/1880)
The Fürstenhof, opened in 1856 and extended in Neo-Renaissance style in 1880, is with its cast-iron balcony architecture, corner cupolas and the Villa Gordon (1884) the most impressive example of Historicist spa-hotel architecture in the Bad Kissingen World Heritage ensemble. The building has stood vacant since its closure in 2004. An investment project acquired in 2008 was never realized and the planning permission lapsed in 2019. Twenty years of vacancy are damaging the building fabric and the townscape; a binding use concept is still lacking.


Fig. 8: General view of the Fürstenhof. Photo: Christi+Co

The "Great Spa Towns of Europe" as an obligation

The "Great Spa Towns of Europe" were inscribed as a transnational serial UNESCO World Heritage Site in 2021. The site comprises eleven spa towns in seven European countries: Bad Ems and Bad Kissingen, as well as Baden-Baden (Germany), Bath (United Kingdom), Spa (Belgium), Vichy (France), Montecatini Terme (Italy), Karlovy Vary, Frantiskovy Lazne and Mariánské Lazne (Czech Republic), and Bad Gastein (Austria).

All German member cities undertook, through the nomination process, an active commitment to protecting this heritage. The four cases documented here – intrusive alteration (Badhaus), prolonged decay (Malbergbahn), acute structural damage (Apolant) and lasting vacancy (Fürstenhof) - describe a structural threat that extends beyond individual incidents and that seriously jeopardises the OUV of the "Great Spa Towns of Europe" in the medium term.

It is essential that authorities and municipalities prepare and accompany any planned interventions within the World Heritage area in close coordination with the UNESCO World Heritage Committee and ICOMOS – only in this way can effective monitoring be ensured and the built heritage preserved for future generations. Local authorities and heritage agencies are called upon to take a proactive and forward-looking approach to the entire built cultural heritage - for instance in the form of a continuously updated, publicly monitored masterplan.


Fig. 9: Detail of the accees to the Fürstenhof. The building is inaccessible. The plaster shows damage from humidity. Photo: anonymous

Menorca Talayotica: Malpractice in World Heritage Management

Joaquim Pons, on behalf of GOB Menorca



Fig. 1: The road construction site and two ossuaries (*navetas*), all of them inside the inscribed World Heritage property.
Map: GOB Menorca

In September 2023, Talayotic Menorca was inscribed on the UNESCO World Heritage List (45 COM 8B.24). Among the various recommendations set out in the World Heritage Committee's resolution is the following:

> *Removing at the earliest opportunity the partially completed road works in the South-east area - Alaior component part and the electrical poles and lines in the landscape areas between different archaeological sites that have a negative influence on the landscape views.*

This resolution also stipulated that in December 2024, the Consell Insular de Menorca, the managing body of the site through the Agencia Menorca Talaiótica, was to submit a report on the actions taken to comply with the recommendations.

When that date arrived, the Consell Insular submitted a report stating its intention not to comply with point i of the Committee's recommendations and, therefore, to complete the ME-1 road construction without demolishing the double-level structure in the Rafal Rubí area. This stance led to some significant resignations in bodies related to the issue in Menorca, such as that of the Director of the Agencia Menorca Talaiótica and that of the international consultant – who recently passed away – Cipriano Marín.



Fig. 2: Intersection and overpass encroaching into the immediate vicinity of the Rafal Rubi naveta.
Plan: https://www.menorca.info/menorca/local/2025/11/06/2506709/unesco-recomienda-parar-obras-rafal-rubi-buscar-alternativa-afecte-navetas.html

Along with the aforementioned report, the Consell Insular (Island Council) sent UNESCO information supporting the claim that, for road safety reasons, this structure was the best solution for the road, attaching a Heritage Impact Assessment that supported this solution and proposed mitigation measures for its impact on the burial navetas in the Rafal Rubí area.



Fig. 3: The intersection and overpass construction are a massive intervention disrupting the cultural landscape.
Photo: https://www.vilaweb.cat/noticies/consell-de-menorca-unesco-rafal-rubi/

After analyzing this documentation, ICOMOS issued a report which it sent to the World Heritage Centre, whose director, in turn, forwarded it to the State Party for its information. This report recommended repeating the Heritage Impact Assessment, as it considered that certain parameters had not been taken into account. Among the conclusions of this report, the following is summarized on this point:

> *Roadworks (C6): submit a full comparative Heritage Impact Assessment dossier (including alternatives, simulations, matrices, and mitigation measures) before taking any decisions that may be difficult to reverse; suspend irreversible works, and clarify the current position of the Talayotic Menorca Agency, in light of its subsequent withdrawal of approval and resignations*

Despite these recommendations from UNESCO and the World Heritage Centre, the Menorca Island Council has decided to proceed with the renovation of this section of the ME-1 highway. Construction of the two-level structure has already begun, disregarding the advice not to undertake any irreversible work until a proper heritage assessment has been carried out.

Menorca Talayotica and Rafal Rubí area

The Menorca Talayotic World Heritage Site is a serial property comprised of nine components or territorial areas. Each of these reflects the different ways in which the prehistoric communities of Menorca settled and occupied the island's territory, and how this occupation evolved over two millennia.

Among other elements, this process can be traced through the evolution of the island's cyclopean constructions, some of which are unique and exclusive creations of its inhabitants: burial *navetas* (ossuaries), circular houses, and *taula* enclosures. Furthermore, these components illustrate the relationship between human occupation and its surrounding territory, a relationship that has persisted to the present day and can still be observed when visiting the prehistoric monuments.



Fig. 5: The Talayotic Menorca World Heritage property on the island of Menorca, indicating the Rafal Rubi site.
Map: GOB Menorca

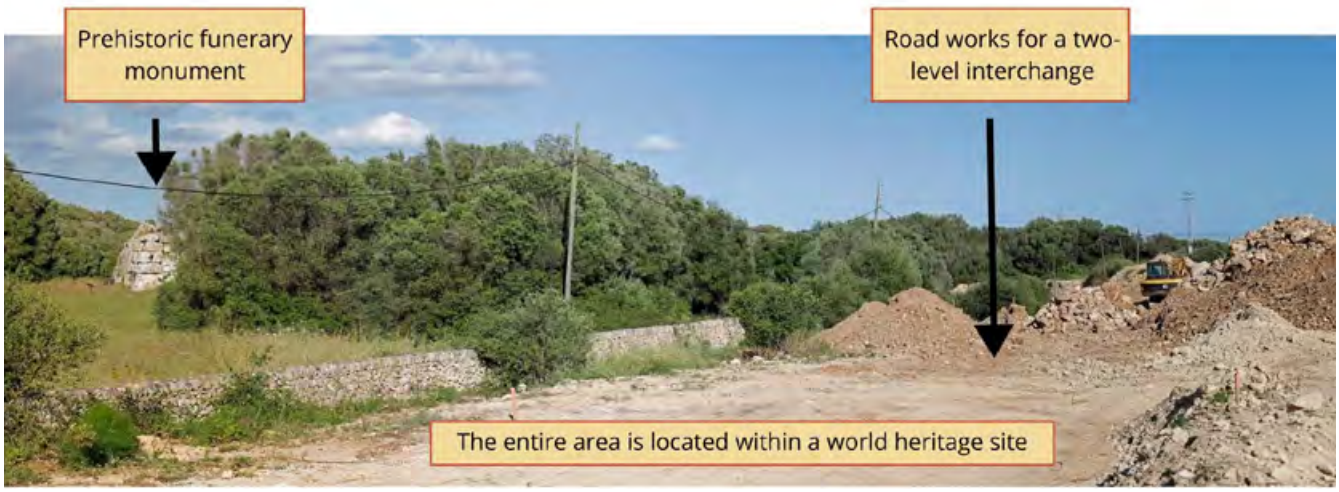


Fig. 4: A view of the construction site, with the Rafal Rubi *naveta* nearby.
Photo:

The Rafal Rubí area is located in the northern part of component C6. Its area extends from the island's south coast, with the Calescoves necropolis, northwards including several Talayotic settlements such as So na Caçana and Torralba d'en Salort, and ends in the central part of the island, where the Rafal Rubí burial navetas are located.

Several characteristics of the Rafal Rubí area stand out as part of the Outstanding Universal Value of Talayotic Menorca:

- Funerary navetas are a unique type of monument exclusive to the prehistory of Menorca, along with the taula enclosures and the Late Talayotic habitation circles.
- The Rafal Rubí navetas follow the typical location pattern of this type of monument, situated in a slightly depressed geographical basin with limited visibility of the surrounding area.
- In the central area of the island, near Alaior, there is a high concentration of burial navetas within a radius of approximately 5 km, suggesting that this area was a symbolic space for the island's prehistoric communities. Rafal Rubí is located within this area.
- Rafal Rubí is unique in having two navetas very close to each other, as they are usually isolated monuments. It is the only example included within the World Heritage Site and one of only two on the entire island, along with the Biniac-l'Argentina navetas.
- From an archaeo-astronomical perspective, Rafal Rubí is of exceptional importance, as the two navetas have different orientations. From the beginning of human occupation on the island, the funerary monuments built were oriented towards the southwest, a pattern that remained unchanged for about 1000 years, until it was broken by the northern naveta of Rafal Rubí, which is oriented towards the south.



Fig. 6: The southern *naveta* of Rafal Rubi. Photo: Stephan Doempke

Current situation regarding point i of the recommendations

The ME-1 road improvement project directly affects the area surrounding the Rafal Rubí navetas. In fact, the land where the bridge with the lower roundabout is located is included within component C6. Furthermore, as this structure rises approximately 6 meters above the current road level, it interrupts the visual field of the navetas, completely altering their surroundings.



Fig. 7: The view from underneath the overpass towards the Rafal Rubi *naveta*. Photo: GOB Menorca

It should be noted that among the mitigation measures included in the Heritage Impact Assessment is the creation of a vegetation barrier to obscure the constructed structure in front of the navetas. Therefore, a double barrier is being created — the bridge and the vegetation — which blocks the view of the navetas' surroundings and completely disrupts the interpretation of the prehistoric landscape of the Rafal Rubí area.

Another factor that has been ignored by the Menorca Island Council is the protection afforded to the lands that comprise the World Heritage Site. The Menorca Island Territorial Plan, the highest legal document for the protection of the island's territory, approved in 2023, grants the category of Area of Landscape Interest to all the lands included within the components of Talayotic Menorca. Specifically, Article 70 of the Island Territorial Plan states the following:

1. Lands of this type that are not included in any other category of the same category, but are delimited as belonging to said category in the graphic representations, are classified as specially protected rural land in the category of Areas of Landscape Interest due to the unique and high value of their rural layout.



Fig. 8: The *navetas* of Rafal Rubi are deeply embedded in the cultural landscape of Menorca and cannot be considered in abstraction from them. Photo: Stephan Doempke

2. Rural lands included in the delimitation of the components of the serial property of the Menorca Talayotic candidacy for the UNESCO World Heritage List will also have this same category of Areas of Landscape Interest, regardless of their inclusion in other land categories for other values or prevention of natural hazards, in accordance with the corresponding graphic representations of this Plan.

Therefore, we are faced with a serious impact on a part of the Menorca Talayotic World Heritage Site. The Menorca Island Council is repeatedly disregarding the recommendations of both the World Heritage Committee and the World Heritage Centre by continuing the ME-1 roadworks in the Rafal Rubí area. Furthermore, the law is being violated by failing to respect the provisions of the Territorial Plan (PTI) which outline the protection of the World Heritage Site. And as already explained, this elevated construction obstructs the visual view of the navetas, severely affecting the VUE of the site.

This malpractice by the Menorca Island Council regarding the World Heritage site goes beyond the damage to the property itself. As mentioned, the decision to continue construction in the Rafal Rubí area ultimately led to the resignation of the director of the Menorca Talayotic Agency in August 2025. These lines are being written in April 2026, and the selection process for a new director of the Menorca Talayotic Agency has still not begun. Currently, this body which is responsible for the direct management of the World Heritage site, lacks the technical staff to carry out its functions.

Therefore, we are facing actions that will irreversibly affect the landscape where the Rafal Rubí burial navetas are located. The position of the Consell Insular de Menorca is to continue with the works despite being contrary to the mandate of UNESCO as reflected in the recommendations of the World Heritage Committee and the World Heritage Centre.

These recommendations are binding on States Parties that have accepted the 1972 Convention Concerning the Protection of the World Cultural and Natural Heritage, as is the case with Spain. In this regard, it is worth noting that the Spanish Ministry of Culture has requested — a request that has gone unanswered — that the Consell Insular de Menorca comply with international law and the UNESCO mandate.

The Durrës Amphitheater: The TID[4] Durrës Project[3] and the Risk of Loss of Integrity

Entela Koja, Civil Society Movement against TID Project

The Durrës Amphitheater[1] is one of the most important archaeological monuments in Albania and among the largest Roman amphitheaters in the Balkans. Located in the historic center of the city of Durrës, the site represents a key testimony of Roman urban and social life in the Adriatic region and much more. The amphitheater has been only partially excavated and remains embedded in the dense urban fabric of the contemporary city. Its Outstanding Universal Value lies not solely in the monument itself, but also in its enduring spatial relationship with the surrounding historic urban landscape, shaped through centuries of continuous urban development.

Despite its significance, the site remains incompletely excavated, inadequately conserved, and highly vulnerable to urban pressures. Its setting, visual integrity, and buffer zone are critical components for any future conservation strategy or potential World Heritage nomination.

The current threat: The TID Durrës Project

The main threat to the Durrës Amphitheater today is posed by the implementation of the so-called TID Durrës Urban Redevelopment Project, presented by national authorities in collaboration with the AADF[2] organization as a programmed for "urban regeneration, restoration and economic development." In practice, the project introduces large-scale spatial, functional and property transformations within the historic core of the city, including areas that overlap with the archaeological territory of the amphitheater and zones where archaeological remains have already been identified.

The project area includes not only the visible monument, but also parts of its wider archaeological and multi-historical urban layers, as well as the surrounding urban context and visual corridors. Instead of prioritizing archaeological research, conservation and de-densification, the TID Durrës project promotes selective and problematic interventions / restorations, new constructions, adaptive reuses and sometime commercial intensification. These questionable interventions risk further fragmenting the site and permanently compromising its visual integrity.

Archaeological context and incomplete knowledge of the site

A critical concern is that the amphitheater has not been fully excavated, and significant archaeological remains are known or strongly suspected to exist beneath existing buildings, public spaces, and within the wider TID Durrës project area.[3] Previous findings demonstrate that the monument extends beyond the currently accessible excavated zones. Even where buildings directly overlying the amphitheater footprint are in the process of being removed, the ongoing project interventions are not primarily focused on the amphitheater itself but on the adaptation and reconstruction of the surrounding urban context. Proceeding with urban redevelopment or so-called "revitalization" before the completion of systematic archaeo-



Fig. 1: A view of the Durrës Amphitheater with dense urban housing at its perimeter. Photo: Entela Koja

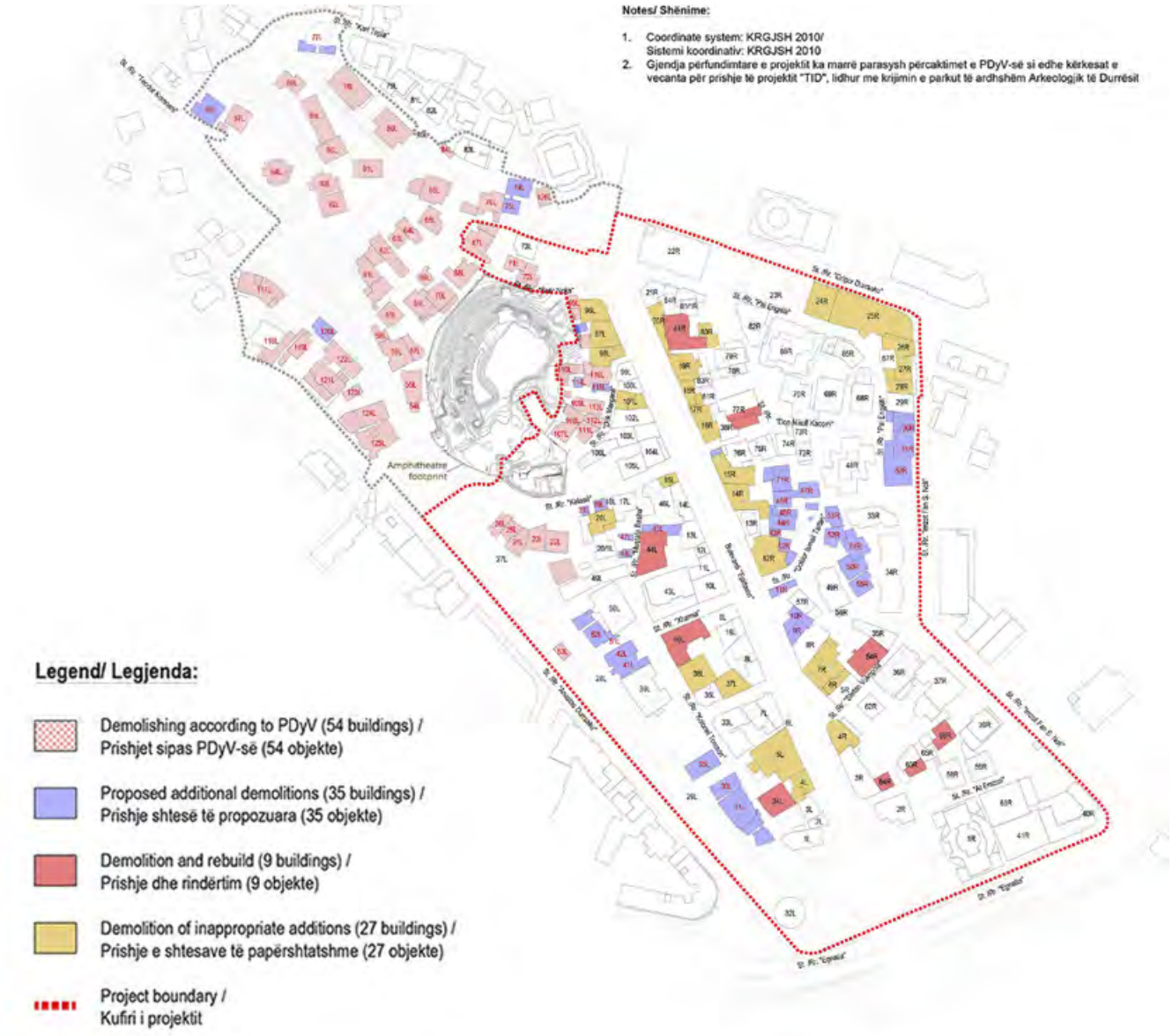


Fig. 2: Plan of demolition interventions in the vicinity of the Durrës Amphitheatre. Map: Albanian-American Development Foundation

logical investigations and a comprehensive study of Durrës' urban stratification — Roman, Medieval, and Modern — poses a serious risk.

The most significant loss is not limited to subsurface archaeological remains, but concerns the irreversible disruption of the coexistence of these urban layers, through large-scale demolitions, questionable reconstructions, and the introduction of entirely new constructions in place of the existing reconstructed urban fabric.

Introduction of a BID (Business Improvement District) management model

An additional and highly problematic aspect of the TID Durrës project is the introduction of a Business Improvement District (BID)[4]–style management model, inspired by Canadian and North American urban governance practices. While BID models may function in commercial districts, their application in an active archaeological and heritage context is deeply concerning.

In the case of Durrës, the BID[4] approach prioritizes: economic returns, tourism-oriented commercial activities, branding and place-marketing, over long-term conservation, archaeological research, and the rights of local residents. The model shifts decision-making power away from public heritage institutions and local communities towards semi-privatized management structures which are not designed to safeguard cultural heritage of outstanding value. Such a management model is incompatible with internationally accepted principles for the protection of archaeological sites and historic urban landscapes.

Unlawful expropriations and social impact

The implementation of the TID Durrës project has been accompanied by expropriations and property pressure affect-



Fig. 3: Examples of buildings selected for demolition. Image: TID Durrës Project

ing residents and property owners within the historic center. These procedures have been characterized by a lack of transparency, insufficient public consultation, and limited access to information.

Local residents report being excluded from meaningful participation in decision-making processes that directly affect their homes, livelihoods and cultural environment. The social fabric of the historic area is at risk of being dismantled, replacing a living historic neighborhood with a controlled, commercialized urban product. The displacement of residents not only violates property and housing rights, but also undermines the social dimension of heritage protection, which is an essential component of sustainable conservation.

Failure of the State Party to ensure adequate protection

The State Party has failed to demonstrate a coherent and transparent strategy for the protection of the Durrës Amphitheater and its setting. Instead of addressing long-standing issues such as incomplete excavation, poor conservation conditions and

excessive urban density, the authorities are accelerating development under the banner of "heritage-led regeneration." Public consultation processes have been largely formalistic and key planning and management documents have not been made fully accessible to the public. To the best of our knowledge, no independent international or local Environmental and Social Impact Assessment (ESIA) has been conducted to comprehensively evaluate the impacts of the TID Durrës project, both on the archaeological site and its potential Outstanding Universal Value, as well as on the wider urban and social fabric.

Why international attention Is urgently needed

The situation at the Durrës Amphitheatr requires urgent international attention because irreversible changes are already underway or imminent. Once new developments are completed and new management structures consolidated, it will be impossible to restore the conditions necessary for proper conservation or any future nomination process.

While UNESCO mechanisms provide an important framework for heritage protection, their procedures may not always align with the rapid pace of ongoing interventions. In this context, broader international visibility, expert review, and constructive civil society engagement can play a complementary role in helping to prevent further harm and avoid the consolidation of irreversible "facts on the ground."

Requested actions

World Heritage Watch, the international heritage community and relevant stakeholders are urged help on the call for:

1. An immediate suspension of all urban development and construction activities within and around the archaeological territory of the Durrës Amphitheater.
2. Full transparency and public access to all planning, management and expropriation documents related to the TID Durrës project.
3. A comprehensive archaeological assessment and completion of excavations before any further urban intervention.
4. An independent international review of the project's impact on the site's cultural and visual integrity.
5. The review of BID-style management models in favor of public, heritage-led governance with strong community participation.

Notes

[1] Durrës Amphitheatre, included in the UNESCO Tentative List since 1996 (Ref. 910). UNESCO record: https://whc.unesco.org/en/tentativelists/910/

[2] https://www.aadf.org

[3] https://www.aadf.org/project/tid-durres/

[4] https://www.researchgate.net/publication/254091655_Business_Improvement_Districts_BIDs_The_internationalization_and_contextualization_of_a_'travelling_concept'

In Butrint – A Visitor Center from Mars?

Jack Chekrezi[1]



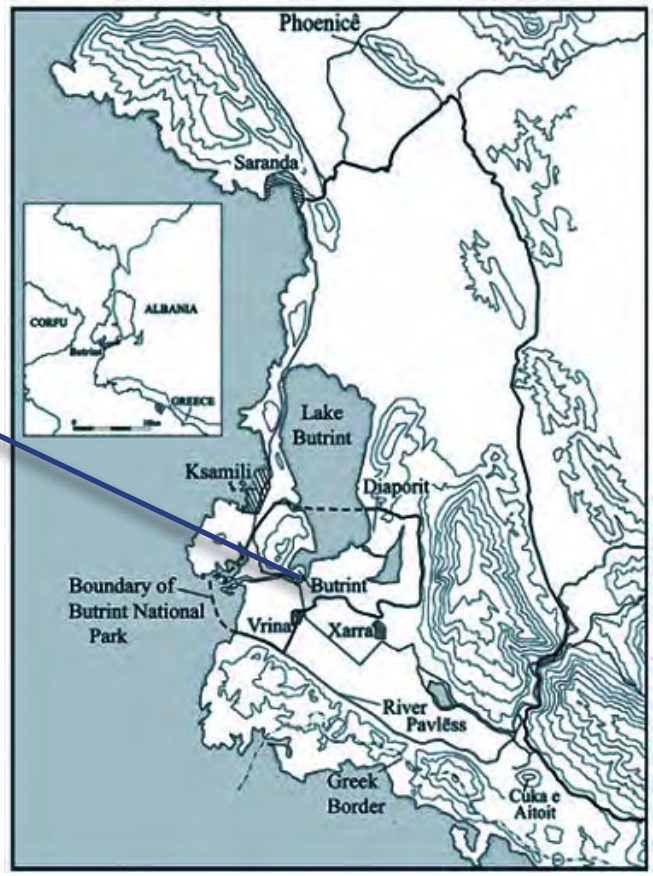


Fig. 1: The Butrint Archeological Park (a special category of Protected Areas in Albania) is a small peninsula at the outflow of Lake Butrint into the Vivari Channel and further into the Ionian Sea. All this is part of the Butrint National Park.
Maps: Butrint: https://the-past.com/feature/butrint-finding-a-timeless-oasis/, Butrint National Park; https://www.penn.museum/sites/expedition/unraveling-butrint/

Butrint World Heritage Site in Southern Albania is facing significant challenges regarding the preservation of its Outstanding Universal Values (OUV), as well as the site's integrity, authenticity and responsible management.

Things are coming to a head with respect to the much-touted Visitor Center (VC). While authorities seem determined to build it – with minor adjustments – as designed by Kengo Kuma and associates, the World Heritage Committee (WHC) and its Advisory Bodies have expressed serious concerns regarding VC's impact over Butrint's OUV.



Fig. 2: A bird's eye view of Butrint from the northwest, showing the planned access constructions, the Visitor Center (center) and the entrance building (right). Photo source: Kengo Kuma and Associates (KKAA) Project Presentation

An unsolicited "gift"

Butrint's Visitor Center – as an idea – was key to dramatically changing the management structure of the Butrint World Heritage Site.

Sometimes in 2018 the Albanian American Development Foundation [the AADF], a non-for-profit entity registered in Delaware, U.S.A. and operating solely in Al-

bania,[2] proposed to invest approx. USD 6 million for a Visitor Center in Butrint. This unsolicited "gift" came with very strong strings attached. In exchange, the AADF, through a dedicated foundation, would assume *de facto* control of Butrint's intramural archaeological park, of inestimable value in itself, far surpassing the 6 million dollars "gift".

Such scheme became the focus of heated political and judicial divergences in Albania, also raising serious concerns over the dilution of the State Party's "primary" role and responsibilities, as provided for in Article 4 of the World Heritage Convention.[3]

As for the Visitor Center, the World Heritage Center emphasized that "**visitor centres must also be subordinate to their landscape setting, which is particularly the case when the [Visitor] Centre is sited within the property, as is the case of Butrint."**[4]

Furthermore, the World Heritage Center made it crystal clear that "the unspoilt nature of the landscape and setting of the monuments constitute an essential aspect of the Outstanding Universal Value (OUV) of the property." [5]

It should be noted that neither the World Heritage Center nor ICOMOS were invited to comment on the design of the VC since the outset.[6]

The Visitor Center would be composed of a Mountain Gate and an Archeological Gate. The first would be located about one kilometer north from the WHS, and the second one right at the WHS present entrance. In sum, the real concern was the potentially negative visual impact of the Visitor Center over Butrint's OUV.

Considering the urgency of the matter, ICOMOS produced a Technical Review in September 2023 based on publicly available data, which included a number of important recommendations. In essence, the State Party was asked (i) to adjust the VC's project timetable; (ii) to conduct a new Heritage Impact Assessment[7]; (iii) to carry out an archeological survey.

The World Heritage Committee made its position clear in its 47th Session, requesting the Albanian authorities

> 9. "…to submit the updated Heritage and Environmental Impact Assessments (HIAs/EIAs), accompanied by a renewed timeline for the proposed new Visitor Centre, to the World Heritage Centre for review by the Advisory Bodies, together with an analysis of the identified adverse impacts of the "Archaeological Gate", for which architectural changes are to be proposed;"[8]

The Heritage Impact Assessment (HIA)

On January 29, 2026 the State Party submitted its State of Conservation Report for Butrint.[9] Around that time "the complete documentation" on the VC, including the HIA, was transmitted to the World Heritage Center. To its credit, Albania formally pledged that "no irreversible decision concerning the project will be taken prior to the completion and review of these updated assessments."[10]

The HIA – as a "working document" – was prepared by two architects arguably with ties to Cultural Heritage without Borders, an entity of unclear legal status.11 Their 93 pages HIA report is staggering with respect to its contradictions and conclusions.

For starters, both authors admit that they **never visited** Butrint during their work on the HIA.[12] Moreover, the authors make it crystal clear that their report is not final, because of "knowledge gaps related to the baseline data".[13]

Regardless of these (and other) glaring deficiencies, the authors venture to conclude that *"none of the protected structures under the Butrint World Heritage Site should be expected to suffer damage due to the construction of the New Visitor Centre or Mountain Gate".*

"Therefore" – they declare - "from a visual risk assessment prospective, the proposed preliminary design of the visitor centre does not pose any threat to the OUV of Butrint".[14]

The HIA authors clearly missed the point. With the exception of the established archaeological impact of the VC's Archaeological Gate footprint,[15] no one was claiming any concerns over potential damages to Butrint WHS's "protected structures" within the intramural section.

The key concern expressed loudly and clearly by the World Heritage Center and its Advisory Bodies was the VC's expected impact over the "natural environment" and the "surrounding landscape", which make up Butrint's OUV.

The authors yet admit that the VC will have "minor to moderate visual impacts", to be outweighed by "functional use, site management and visitor experience".[16] This is clearly wrong. **The Visitor Center should have zero impact over Butrint's OUV. Alternatively, it should be relocated.**

Moreover, the HIA authors unfortunately ignore the "natural heritage" aspect of Butrint WHS, as outlined in Article 2 of the World Heritage Convention.[17]

Conclusion: Relocating the visitor center or placing Butrint in the Endangered List?

Visitor Centers, in general, are intended to facilitate public access and exposure to cultural sites. In essence they provide (i) descriptions, maps, interactive narratives; (ii) a museum/ shop and (iii) facilities. They should be unassuming, and if possible,

placed at a distance safe enough as to not infringe or interfere into the site's OUV.

The proposed Butrint's Visitor Center on paper looks rather imposing. In October of 2025 Albania's Prime Minister praised the project, stating that *"it's a Japanese touch. That means quality, means perfection. It's really amazing and I believe it might be, it can become one of the best, if not the best Visitor Center in the world".*[18]

However, the issue is not how beautiful is the new Visitor Center. No matter how modern or chic in appearance it is, the proposed VC cannot overshadow Butrint. And the real issue is its impact over Butrint's OUV.

The new HIA is not a reliable document. Its shortcomings are easily recognizable.

At this point perhaps the best option is to relocate the Visitor Center altogether far from its current proposed location to the Northern entrance of Butrint National Park, near Ksamil.

Transportation of visitors could be well arranged through dedicated buses, as it is established practice in other WHS and national parks (see, for example, Denali National Park in the U.S.A.), visited by hundreds of thousands of visitors each year.

As we know, Butrint was inscribed to the World Heritage List in 1992 under criterion (iii).[19] The retrospective Statement of OUV was adopted in 2014.[20] Butrint's "natural environment" and "surrounding landscape" are essential elements of its OUV. Butrint's "natural environment" is key to criterion (iii)[21], whereas its "landscape" is referred to in the description of "Integrity",[22] and "Authenticity".[23]

Therefore, any development that may infringe Butrint's natural landscape, and that certainly includes the proposed Visitor Center, seriously infringes on WHS's "natural heritage", as implied in criterion (iii), thus clearly affecting its OUV. And if indeed the Outstanding Universal Values of a WHS are affected, then this Site should be inscribed in the List of World Heritage in Danger.

Two options are therefore on the table: either the State Party has to scrap altogether the current Visitor Center project and/or relocate it reasonably away from the WHS, or the World Heritage Committee should mobilize collective efforts and place Butrint in the List of World Heritage in Danger, pursuant to Article 11.4 of the World Heritage Convention.

Images of the planned intervention

All images and captions are from Kengo Kuma and Associates' (KKAA) Project Presentation



Fig. 3: "The Visitor Center acts as a connecting gate that bridges the landscape."



Fig. 5: "Blending with the surrounding nature"



Fig. 4 "Emerging from the landscape"

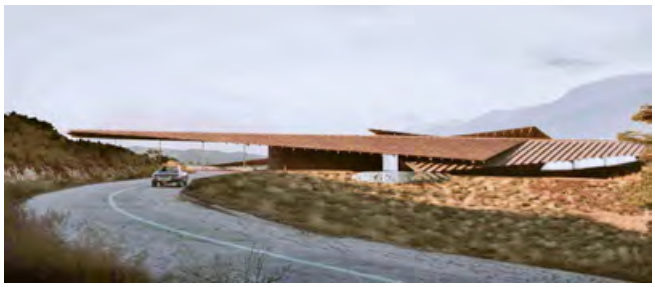


Fig. 6: "The Visitor Center acts as a connecting bridge and a new gateway to the National Park"

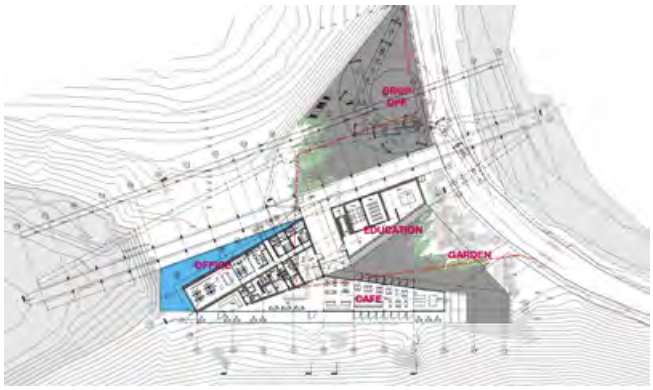


Fig. 7: Floor Plan of the Visitor Center



Fig. 8: "Visitor Center as an opportunity for connection"



Fig. 9: "New entrance gate to the archaeological site"



Fig. 10: "Roof structure and openings are fully integrating with existing trees and greenery"

Notes

1 The author is a member of ICOMOS USA and known to World Heritage Watch. The views herein are his own.

2 It is rather bizarre that the AADF's parent company, which is the Albanian American Enterprise Fund [AAEF] had its non-for-profit status automatically revoked by the IRS as of May 18, 2026, see https://apps.irs.gov/app/eos/details/, searching for EIN: 13-3826249.

3 Pursuant to Article 4 of the World Heritage Convention, the State Party "the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural …situated on its territory, belongs primarily to that State." The World Heritage Center and the Advisory Bodies expressed deep concerns about various aspects of this bizarre "indirect management" arrangement, which we are not going to detail here.

4 Letter to the Permanent Delegate of Albania to UNESCO, of 4 October 2023, Ref: CLT/WHC/EUR23/14426

5 Ibidem.

6 The VC was designed by Kengo Kuma Associates, a reputable architecture firm from Japan.

7 Previous HIAs conducted by Cultural Heritage without Borders Albania were clearly inadequate.

8 Decision 47 COM 7.b.93 Butrint (Albania)

9 https://whc.unesco.org/en/documents/224854

10 State of Conservation Report, para9, p. 7.

11 According to its website, "Cultural Heritage without Borders (CHwB) in Sweden dissolved on 31 December 2025. This does not apply to CHwB in Albania, Bosnia and Herzegovina, and Kosovo who continue with their activities and operations.". https://chwb.org, accessed in May, 2026.

12 The exact statement is: " Both authors have visited the site and its surrounding areas a couple of times in the last ten years, therefore specific visit was not executed while preparing the report". HIA Report, Methodology, page, 7.

13 Idem, p. 12. Inter alia authors state that "Design development drawings" … do not correspond to what is generally recognized as "Detailed design…

14 HIA, Conclusions, at p. 88.

15 See Luan Perzhita's Report on the Conduct of Archaeological Surveys along the route of the 'Archaelogical Gate" compiled within the framework of the project "Visitor Center in Butrint" by licensed specialist Luan Perzhita (2024) confirmed the area's exceptionally high archeological potential". HIA Report, p. 72.

16 HIA, Cunulative Impact, p. 76.

17 Article 2 For the purposes of this Convention, the following shall be considered as "natural heritage":"… natural sites or precisely delineated natural areas of outstanding universal value from the point of view of science, conservation or natural beauty." https://whc.unesco.org/archive/convention-en.pdf

18 See Edi Rama's statement on that day, https://www.facebook.com/ediramaal

19 WHC-2/CONF.002/7Rev 18 November 1992 at https://whc.unesco.org/document/647, under criteria C (iii).

20 https://whc.unesco.org/archive/2014/whc14-38com-8E-en.pdf

21 *Criterion (iii):* The evolution of the natural environment of Butrint led to the abandonment of the city at the end of the Middle Ages, with the result that this archaeological site provides valuable evidence of ancient and medieval civilizations on the territory of modern Albania. Ibidem.

22 "The surrounding landscape provides the context for the past urban change at Butrint." Ibidem.

23 The authenticity of the World Heritage property Butrint is related to its excellent preservation on a site where the changing human interaction with the environment can be observed in the surviving monuments, the below-ground archaeology and the surrounding landscape." Ibidem.

More Drastic Building Interventions in the Acropolis of Athens

Tasos Tanoulas

It is already five years since the expedition of a joint Advisory Mission of UNESCO and ICOMOS representatives came to Athens in April 2022, for monitoring the works on the Acropolis, Athens, a site inscribed in the World Heritage List in 1987. This Mission was UNESCO's response to the international outcry raised since 2020, by (a) the fact that the living rock of the Acropolis had been covered extensively with reinforced concrete by the Greek Ministry of Culture (Fig. 1) and (b) by the projects then announced, by the same Ministry, for covering the entire Acropolis with terraces and constructions made of new materials[1] and for "reconstructing" the Roman flight of steps on the western access of the rock (Fig. 2).



Fig. 1a; The area east of the Propylaia, in the process of being paved with reinforced concrete, covering over the face of the living rock. View from the top of the east front of the Propylaia. The metal mesh is spread on the plastic sheet spread out on the living rock.
Fig 1b: The area east of the Propylaia, in the process of being paved with reinforced concrete, covering over the face of the living rock. The wet cement on the picture 's left end is covering the plastic sheet and metal mesh, seen in FIG. 1a. View from the northwest corner of the platform. Above left, the west end of the Parthenon.
Photos: Tasos Tanoulas, October 29, 2020



Fig. 2a: A conjectural representation of the Acropolis plateau in the 2nd century A. D., superposed on the digital photomosaic plan of the Acropolis depicted in FIG. 2b. It shows of the potential form of the Acropolis plateau if the Acropolis rock were covered with new structures in the form of levelled terraces.
Fig. 2 b: Digital photomosaic plan of the Acropolis plateau, before the implementation, in 2020, of the reinforced concrete pavement and the installation of the present elevator.
Source: Greek Ministry of Culture and Sports

The Mission's Report was published in spring 2023: Compromising with the completed works as a *fait accompli*, the Mission's report proposed only corrections for what was done but, for the projected works of covering the rock and for the western access, it recommended to the Greek State Party to comply, from now on, with the UNESCO/ICCROM/ICOMOS/IUCN (2002) and other management guidelines of the World Heritage Convention.[2]

The Hellenic Ministry of Culture arbitrarily presented the Mission's report as laudatory,[3] at the same time belittling the recommendations for conforming with the guidelines of the World Heritage Convention[4] and any different interpretation of the Report.[5] Instead of conforming to the recommendations of the Mission's report, the Ministry of Culture continued to build massively, in a way that cynically violates the internationally accepted guidelines. The pretext that they serve utilitarian needs

cannot in the least justify the fact that they violate the national legal framework by being carried out with the use of heavy mechanical equipment, instead of proper systematic excavation.[6]

In the same line, the President of the Committee for the Conservation of the Acropolis Monuments, a body most important for all the implementations on and around the Acropolis, expressed publicly his disrespect for the Advisory Mission and its Report, concluding that, no matter what they suggest, he and his team would still do what they hold as correct.[7] In this frame of mind, the problem of crowding tourists, instead of being addressed by research and thorough study for the completion of the long due Acropolis and Tourism Management Plans (suggested by the Joint Mission Report), is used as an excuse for more structural implementations in the western access and inside the Propylaia.[8] [9] Despite the complete lack of transparency that prohibits access to the processes of the Ministry of Culture's agencies, there is information that the discussions in the Committee for the Conservation of the Acropolis Monuments did not result in changing the baseline of the studies. The activities of the last years summarized above have already been described in WHW Reports 2024, 2025[10] (Fig. 3).

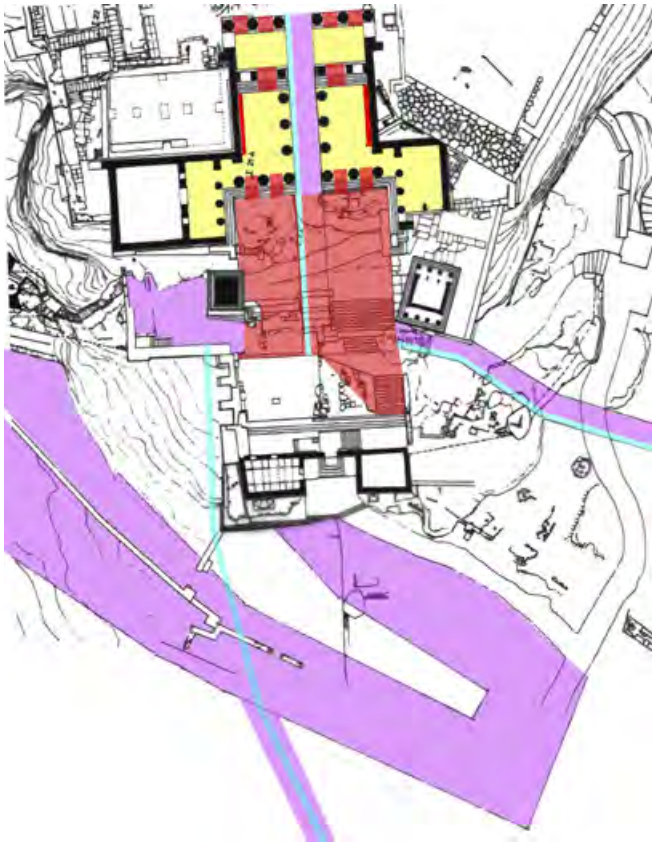


Fig. 3: Plan of the western access to the Acropolis, according to the projects of the Ministry of Culture. Red, indicates new material added in the western access between the Propylaia and the Beulé Gate, including structural implementations in the Propylaia (sheathing original marble steps and stylobates with stainless steel, reconstruction of the benches along the side walls of the Ionic Hall). Purple: new material, covering the terrace to the north of the Agrippa pedestal, and new pathways to the north, west and south of the Acropolis. Yellow: areas of the Propylaia, at the same time serving as station for disabled people equipment, as passageway for all visitors going into and out of the Acropolis, and as visited architectural masterpiece. Blue: platform-lifts moving along rails on the one side of pathways or steps.
Source: Tasos Tanoulas, 2024

This policy is continued on the Acropolis, in its slopes, and in the immediate proximity, including most important monuments representing Ancient Greek Culture, while none of the prerogatives of the 2022 Advisory Mission's Report have been fulfilled. These prerogatives are:

1. Prior to any implementation, a Heritage Impact Assessment of the studies approved by the Greek State Party should be carried out, based on detailed documentation with argumentation, plans and drawings; next, the whole package of information should also be shared with the WH Centre for review with the Advisory Bodies, prior to commencing implementation.

2. Since no Management Plan nor Tourism plan have ever been submitted for the Acropolis, such plans should be done, and the Acropolis implementation projects should be inscribed in them.

The Acropolis plateau

The NE area of the plateau was always inaccessible to visitors because of its ancient remains. It is about two years that this restricted area has been extended to the north and west, with the excuse of the implementation of structural works for the transformation of the old Acropolis museum for serving new functions, the refurbishment and extension of the visitors' toilets on the plateau, and for the consolidation of the Acropolis walls and other antiquities (Fig. 4). It seems very probable that the rather robust implementations at the southeast corner of the Acropolis, just inside the ancient walls, are projected towards accommodating a second elevator, as the Minister of Culture has announced.



Fig. 4: View of the southeast area of the Acropolis plateau, showing part of the work-site to the north and west of the old museum of the Acropolis. The mess is obviously due to many small multi-purposed projects which have been going on in a slow pace for almost two years. At the background: Mount Hymettus and the old museum.
Photo: Tasos Tanoulas

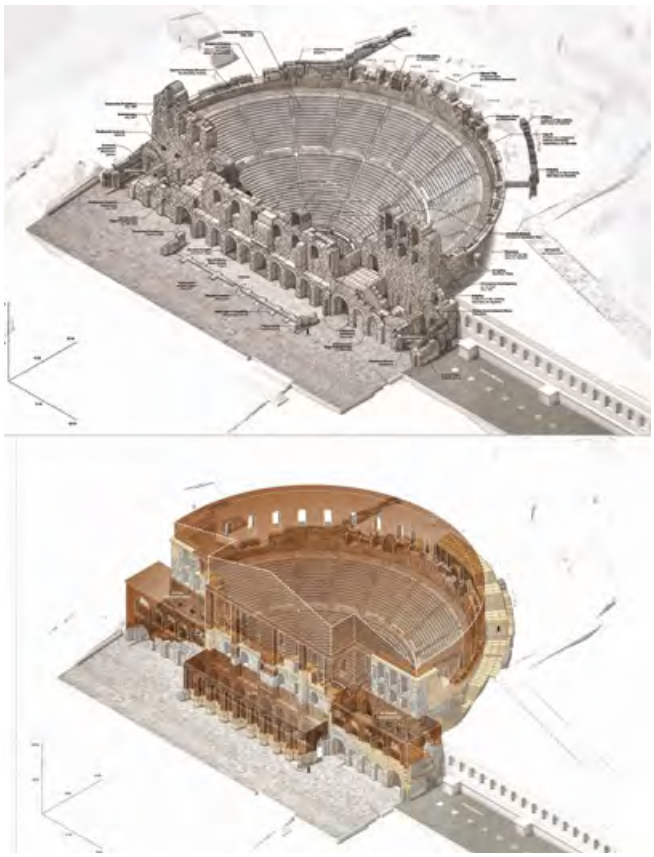


Fig. 5: a. Actual state of the Odeion of Herod Atticus. Source: LIFO, 23.2.26, b. A conjectural reconstruction of the original shape of the Odeion of Herod Atticus. Source: LIFO, 23.2.26

Odeion of Herod Atticus

The Odeion of Herod Atticus on the south slope of the Acropolis, a major monument of the second century A.D., in the immediate proximity of the south wall of the Acropolis and the west access, is closely connected with the iconic image of the Acropolis rock and plateau from the south and south west, as it is being projected on the rock of the Acropolis, above which the Acropolis wall and the Periklean monuments hover. The Odeion of Herod Atticus will be closed to the public for over three years, for massive reconstruction, rehabilitation and updating of the mechanical equipment for the needs of the annual Athens Festival, which is held in the monument in summer (Fig. 5–6).

Athenian Agora

New buildings are being erected since last spring, to serve as ticket offices for the entrance at the site's northern boundary. Instead of proper systematic excavation, mechanical equipment was used for digging; the vertical surface of dirt revealed, was covered by a tall retaining wall made of reinforced concrete, facing southwest (Fig. 7–8).

New pavement of concrete is under construction across the Agora, over the Panathenaic Way from the northwest to the southeast. At the southeast corner of the Agora, the founda-

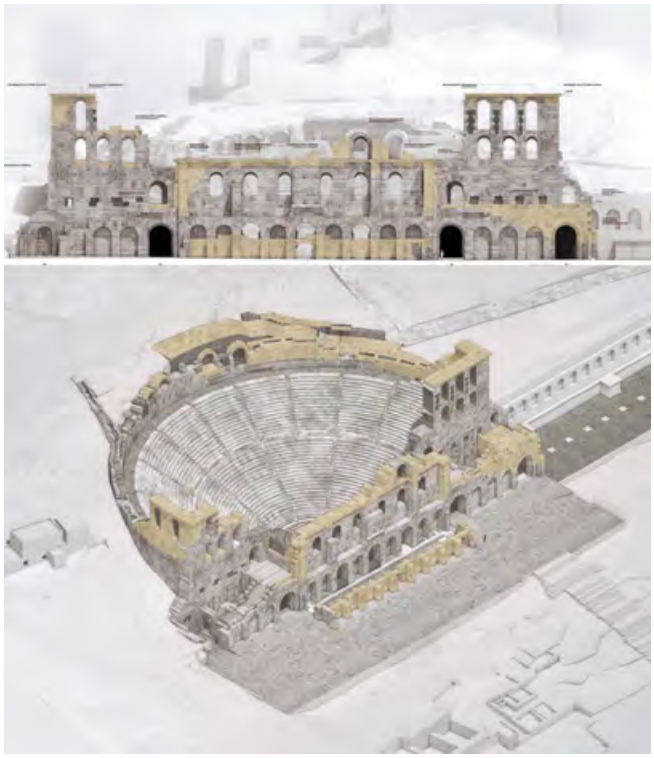


Fig. 6: a. The south front of the Odeion of Herod Atticus, after the projected reconstruction. Reconstructed parts indicated in yellow. b. View of the Odeion of Herod Atticus from SW, after the projected reconstruction. Reconstructed parts indicated in yellow. Source: LIFO, 23.2.26



Fig. 7: Digging inside the northern entrance of the Athenian Agora, view from the south. Caterpillar machinery is used. Source: Tasos Tanoulas, May 2025



Fig. 8: Inside the northern entrance of the Athenian Agora, from the same point of view as Fig. 7. The work is completed. Source: Tasos Tanoulas, March 2026

tions of a Roman temple, known as the Southwest Temple, are being covered with reinforced concrete poured at the site. The krepis, that is, the formal steps of Greco-Roman architecture, has already been reconstructed in reinforced concrete (Fig. 9). It is destined for the erection of a number of Ionic columns which are attributed (in second-hand use) to the north façade of the temple; these columns originate from the classical temple of Athena Sounias (the original foundations are identified at Cape Sounion) and are now lying nearby. The reconstruction of the architecture is hypothetical since what survives from the temple is the lowest levels of foundation, and the attribution of the columns is conjectural. However, nothing could justify sealing the original remains under masses of reinforced concrete.

Nevertheless, very close to the northwest temple, more steps are reconstructed with reinforced concrete, on top of surviving original roman steps lining the Panathenaic way on the west side, to allow access at a platform before the east end of the Middle Stoa. (Fig. 10) It seems that there are no proper studies



Fig. 9: a. The South East temple of the Athenian Agora, view from the E. The original vestiges of the foundations are completely covered with reinforced concrete, aiming at a sort of "reconstruction". At front level, the original Roman pavement of the Panathenaic Way. At the background, the Byzantine church of the Holy Apostles. Source: Tasos Tanoulas, 20.2.26.

Fig 9b. The South East temple of the Athenian Agora, view from the same point of view as in FIG. 9a. The original vestiges of the foundations are completely covered with reinforced concrete, aiming at a sort of "reconstruction". At front level the original Roman pavement of the Panathenaic Way. At the background, the Byzantine church of the Holy Apostles. In the ten days separating these photographs, the krepis and the door sill have been completed, along with the low parts of the flanking walls. Source: Tasos Tanoulas, 1.4.26



Fig. 10: On top of original Roman steps, before the east end of the Middle Stoa in the Athenian Agora, new steps are being "reconstructed" in reinforced concrete. A. Detail and B. general view. At the upper level of both Figures, the SE Temple seen from NW. Source: Tasos Tanoulas, 20.2.26



Fig. 11a: A view of surviving parts of the "Diateichisma" b: An aerial view of surviving parts of the "Diateichisma", indicating projected interventions for "enhancement". Source: Greek Ministry of Culture

for the reconstructions, as all the works appear in the frame of a rainwater drainage implementation project.

Kerameikos

At the same time, major works are carried out in the Kerameikos. There is information for hasty digging with improper methods, but the site is inaccessible and closed all around with panels, defending visual contact. Only the new entrance from the Agion Asomaton street is accessible, showing massive reinforced concrete structures being under construction.

Wider site of the Acropolis

Works have been announced for the enhancement of the 'diateichisma', the fifth century B.C. ancient wall between the hill of the Nymphs and the hill of Muses (Philopappos Hill) (Fig. 11).

All these interventions affect the authenticity and the integrity of the monuments and are not in conformity with the International Conventions as well normative texts on restoration and conservation of cultural heritage, being absolutely incompatible with the principles of the World Heritage Convention, as recommended in the UNESCO/ICOMOS Advisory Mission Report, the 1964 Venice Charter and the 2003 ICOMOS Charter. As far as we know, the Greek State Party has not provided UNESCO, and the Advisory Bodies, with the files of information, responding the prerogatives of the Advisory Mission's report.

After five years of continuous concerns from the international scientific and public community, as well as from international NGOs, questions are raised by the fact that the issue of the Acropolis is not included on the agenda of the Committee. Why and on which competence and authority the Center is avoiding to deal with the problems of the Acropolis and the archaeological sites around it? Once more, one is forced to strongly believe that a serious issue is being raised about the credibility of the Convention and the transparency of the Center's functioning which could also be considered as an abuse of power.

The press release of ICOMOS Hellenic dated October 6, 2024, was communicated to all the National Committees of ICOMOS. It was also communicated to the World Heritage Center of UNESCO, with a letter addressed to WHC Director Lazare Eloundou-Assomo. In addition, it was communicated to Ernesto Ottone Ramirez, Assistant D.-G. Culture, UNESCO, and Maria Liouliou, project coordinator at the WHC. The letter was signed by Tasos Tanoulas, Architect, MA, PhD, then President of ICOMOS Hellenic, Head of the Restoration of the Propylaia (1984-2010). According to the guidelines, the content of this letter and the press release of the Greek ICOMOS should have been communicated to the Greek Authorities for an update on the issues mentioned in the documents. Has the WH Centre received answers from the Hellenic Ministry of Culture? If so, does the WH Centre find these answers satisfactory? In positive case, we would like to know the justification of this opinion.

On May 6, 2026, letter was addressed to the WH Center, communicating the last press release of ICOMOS Hellenic, published on April 6, 2026. There is no response yet!

Once more, we ask the following actions to be taken:

1. The "Acropolis, Athens" World Heritage Property must urgently be put on the agenda of the World Heritage Committee.
2. The World Heritage Committee must request from the Hellenic State Party
   a) To stop all practical activity on the site immediately.
   b) To fulfill the prerogatives of the Advisory Committee Report (Heritage Impact Assessment of the studies approved by the Greek State party with argumentation, plans and drawings to be shared with the WHC for review together with the Advisory Bodies and, also, Management Plan and Tourism plan for the Acropolis to be submitted, with the Acropolis implementation projects inscribed in them).
   c) Not to proceed to any intervention before the WH Committee has taken a decision about the implemented and planned works.

Notes

1 https://world-heritage-watc;h.org/content/wp-content/uploads/2021/06/WHW-Report-2021.pdf, pp. 21-27 (Accessed 15.03.2026) https://world-heritage-watch.org/content/wp-content/uploads/2022/11/2022-Report-WHW-final.pdf, pp. 227-231 (Accessed 15.03.2026)

2 https://whc.unesco.org/en/documents/199557 (Accessed 15.03..2026)

3 https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4560 (Accessed 15.03.2026)

4 https://www.kathimerini.gr/society/562377325/unesco-poly-kala-prostateymeni-i-akropoli/ (Accessed 15.03.2026) https://www.in.gr/2023/04/19/life/culture-live/unesco-akropoli-protypo-syntirisis-klironomias-se-pagkosmio-epipedo/ (Accessed 15.03.2026 https://www.lifo.gr/now/entertainment/unesco-i-akropoli-protypo-syntirisis-klironomias-se-pagkosmio-epipedo (Accessed 15.03.2026)

5 https://thepressproject.gr/epistimones-kai-anthropoi-tou-politismou-stilitevoun-to-neo-tsimentoma-tis-akropolis/ (Accessed 15.03.2026)

6 https://world-heritage-watch.org/content/wp-content/uploads/2023/06/WHW-Report-2023.pdf, pp. 48-49 (Accessed 15.03.2026)

7 Transcribed and published at https://triantafylloug.blogspot.com/search/label/ΑΡΧΙΤΕΚΤΟΝΙΚΗ%20ΔΙΑΛΕΞΕΙΣ. (accessed 15.03.2026). The excact phrasing is: “Even if UNESCO had different views, we are not a protectorate, and so we would do what we hold as correct.” ... “our interlocutors from UNESCO were not better than us! They did not have the same specialization, not our PhDs, nor our books, neither our range of international science! They are simply UNESCO executives and, in spite of this, they come to judge us! We were humiliated when they came. I knew that I was better [than them], …

8 https://www.culture.gov.gr/el/Information/SitePages/view.aspx?nID=4615 (Accessed 15.03.2026)

9 https://www.theguardian.com/world/2023/jul/09/acropolis-greek-tourists-cruise-ships-athens-controls (Accessed 15.03.2026)

10 Korres, M., Μελέτη Αποκαταστάσεως της Αναβάσεως (Study of the Restoration of the Ascent), Athens 2021. Tanoulas, T., The Acropolis of Athens: A Story of Arrogance and Fallacy, World Heritage Watch Report 2024, p. 17-22. Idem, Drastic Interventions in the Archaeological Sites of the Acropolis and its Slopes, World Heritage Watch 2025, p. 27-32.

Eleusis, One of the Most Important Sanctuaries of Antiquity, Must be Saved from New Threats

Ilias Monacholias, Elefsina Arts and Culture



Fig. 1: The Great Eleusinian Relief is one of the most celebrated art works of antiquity. Demeter, the goddess of agricultural abundance, stands at the left. At the right is Persephone, her daughter and the wife of Hades, the god of the underworld. The boy is thought to be Triptolemos, who was sent by Demeter to teach men how to cultivate grain. Photo: Meisterdrucke.com

The archaeological site of Eleusis — just west of modern Athens — was one of the most sacred places in the ancient world. Its significance comes primarily from the Eleusinian Mysteries, a set of secret initiation rituals dedicated to the goddess Demeter and her daughter Persephone. These rites were practiced for nearly 2,000 years, from around 1,500 BCE until the late 4th century CE — longer than most religious traditions in Europe. Eleusis was directly connected to the Acropolis of Athens through the Holy Way (hiera odos) on which every year the most important sacred procession of ancient Greece took place.

Life, Death, and Rebirth were the core meaning of the Mysteries, since at the heart of Eleusis lies a powerful myth while Persephone is abducted into the underworld, Demeter mourns, causing famine on Earth and Persephone returns, restoring life and fertility.

This cycle became a symbolic framework for agricultural renewal (seasons), human mortality and hope after death, spiritual transformation. The Mysteries offered initiates something radical for the ancient world, a personal, emotional assurance of life beyond death — not just myth, but experience.

The Eleusinian Mysteries were Europe's first "Inner Religion", since unlike public Greek religion, the Mysteries were secret and experiential, open to men, women, slaves, and foreigners, focused on initiation and transformation. Participants underwent rituals in the great hall called the Telesterion, culminating in a profound, unspoken experience. Ancient writers like Cicero claimed that "Athens has given nothing more excellent… than these Mysteries."

The Mysteries introduced ideas that later shaped European spirituality, personal salvation, initiation as transformation, sacred drama and symbolic revelation. These ideas echo later in Early Christianity, Medieval mysticism, Renaissance esoteric traditions. The Mysteries formed a bridge between Myth and Philosophy influencing not just religion—but philosophy and culture. Great philosophers were likely influenced by the Mysteries' emphasis on hidden knowledge (gnosis), transformation of the soul and reality beyond appearances.

Eleusis helped shift Greek thought from Myth as story to Myth as symbolic truth. This transition is foundational to Western philosophy. But beyond Europe there is a Universal touch. The Archetypal Pattern (The Demeter–Persephone myth reflects a pattern found globally: Death → descent → return → renewal). Comparable themes appear in Egyptian Osiris myth, Mesopotamian Inanna, Christian resurrection narratives. This suggests Eleusis expresses a deep human psychological and cosmic pattern.

Apart from the influence on human consciousness, Eleusis gave humanity a proto-ecological vision since it implicitly taught that humans are dependent on natural cycles and disrupting nature

leads to collapse. This resonates strongly with modern ecological thinking.

Eleusis is not just an ancient ruin — it's a foundation layer of European identity. Its influence on the cultural history of Europe cannot be overstated. For Europe one of the earliest expressions of shared spiritual culture, a precursor to universal religious participation, a root of philosophical and mystical traditions for humanity offers a symbolic language for death and meaning, renewal and resilience, connection to nature.

Melina Mercouri, Greece's first Minister for Culture and the founder of the European Capital of Culture program - wanted Eleusis to become the first Greek World Heritage site, and she worked for that. Also, Friedrich Schiller's libretto to the final chorus of Beethoven's celebrated 9th Symphony, which became the European Hymn, refers to joy as "the daughter of Elysium". After thousands of years, Europe still celebrates Eleusis, and it should be Greece's most noble task to have it recognized as a heritage of all humanity.

> Joy, thou beauteous godly lightning,
> Daughter of Elysium,
> Fire drunken we are ent'ring
> Heavenly, thy holy home!
> Thy enchantments bind together,
> What did custom stern divide,
> Every man becomes a brother,
> Where thy gentle wings abide.
>
> *Translation by William F. Wertz*

In the last decades of the 19th century, however, industries began to be established in the present-day city of Elefsina — along the coastline and very close to the Sanctuary of the Eleusinian Mysteries. Today, the officially designated Archaeological Site has essentially been restricted to the area of Telesterion. The hill where the Ancient City once stood (west of the Acropolis) and the areas where the Stadium and the Theatre were likely located (south of the Acropolis) were never excavated, due to the establishment of industries, especially the TITAN cement factory.

The present Archaeological Site of the Telesterion was effectively strangled by the TITAN factory and suffered serious damage from cement dust emitted by its chimneys. ICOMOS has recognized the Archaeological Site of Eleusis as one of the most important Panhellenic sanctuaries of antiquity, crucial for understanding the Eleusinian Mysteries, with unique architecture (the Telesterion) and historical continuity. It has supported the site's inclusion on UNESCO's World Heritage List.

However, this nomination has not yet taken place. The reason is the "suffocation" caused by TITAN, and ICOMOS has protested about the damage inflicted on the Site by the factory. The wider area has also suffered greatly — especially the coastal

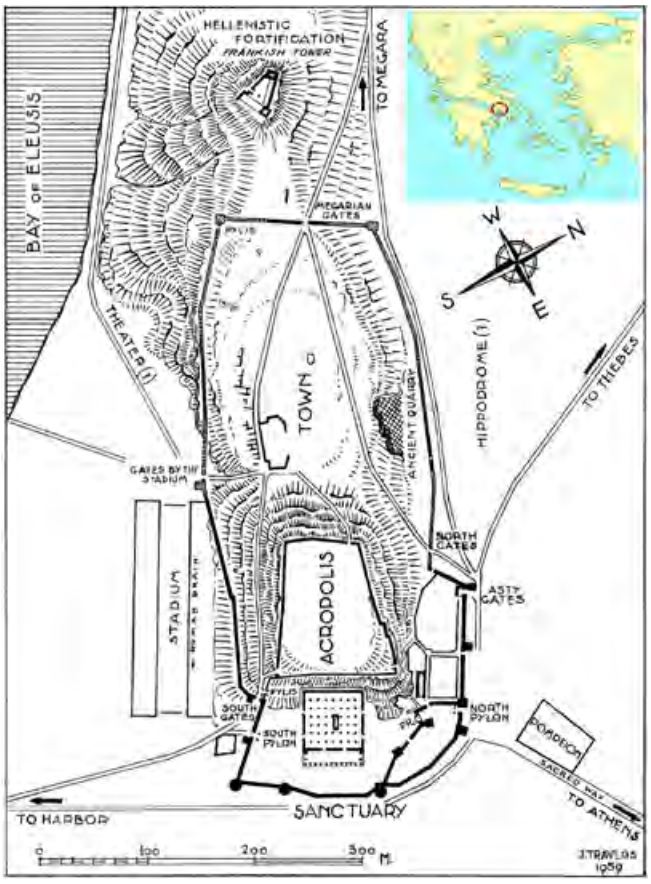


Fig. 2: The ancient town of Eleusis. Plan: John Travlos, 1959

zone. Today, following the economic crisis that led to the closure of many industries in the broader region, the shores of our enclosed Eleusis Bay host:

- 2 oil refineries (out of the 3 operating in the country, the third is located a few kilometers away within the Saronic Gulf),
- 2 shipyards,
- the TITAN cement factory,
- the commercial bulk cargo port (the only one of its kind in Attica),
- and several other businesses contributing to pollution in the Bay.



Fig. 3: The visual integrity of the archaeological site is heavily impaired by the imposing presence of the neighbouring TITAN factory. Photo: Stephan Doempke



Fig. 4: Aerial view of the present archaeological site, with the industrial zone blocking the connection with the sea in the background.
Photo: Elefsina Arts and Culture

Within the boundaries of the Municipality of Eleusis and the wider Thriassio Plain area, many logistics facilities are operating, creating major problems — especially in road traffic. Instead of protecting the Bay — which is currently in a period of environmental recovery — and the wider area, and in line with the directions proposed by the planners of the Municipality's Local Urban Plan (still under preparation), the Government and the legal entities it controls (e.g. Hellenic Republic Asset Development Fund (HRADF), ETVA VI.PE) are preparing new burdens for the city:

1. HRADF, according to the master plan it has prepared, is planning the relocation of the port to the Vlycha area, next to the TITAN cement factory, very close to the residential area and to a wetland that forms the outflow of the active Soures stream. Such a new port installation would require the landfilling of hundreds of hectares and possibly dredging works in the marine area. This would stir up the seabed, releasing substances currently trapped in the sediment and significantly worsening water quality in the bay. Yes, the current commercial port must be relocated to free the coastline in front of the main residential area — but it must not be moved to Vlycha. The best relocation site would be the inactive lands of HALYVOURGIKI. This location lies within municipal boundaries but away from residential areas and offers road and rail connections that would not burden the urban fabric. Vlycha must instead be protected and regenerated for the benefit of residents.
2. Three months ago, the Government passed a legislative amendment enabling the Eleusis Shipyards to expand their activities, in line with the declared goals of the company currently operating them:

- Massive expansion of shipbuilding activities, focusing on repairs of large and other vessels (commercial, passenger, and military) and construction of new ships, aiming to establish Elefsina as a leading shipbuilding center!;
- A railway industry, through the establishment of a new company for the production and repair of railway wagons;
- Logistics and port infrastructure, including a modern freight hub with road and rail connections to the Thriassio Freight Center and the Eleusis Military Airbase;
- An energy hub, aligned with the Greek American strategy for natural gas transport, "geopolitically upgrading" the area. Bay;
- All of this implies a dramatic burden on Eleusis Bay and a serious degradation of residents' quality of life.

All this comes while Eleusis and the Thriassio area already constitute a saturated industrial hub, squeezed between two oil refineries, two shipyards, and 22 SEVESO II upper- and lower-tier facilities.

These new burdens — based on very recent plans — are emerging at a time when the Municipality's Local Urban Plan is being prepared. In the first phase of the urban planning process, after examining three future scenarios, the planners selected the one that envisions restoring the Municipality's vital role through structural interventions aimed at reclaiming essential natural space, including:



Fig. 5: General view of the Gulf of Eleusis. Its entire coastline is occupied by industrial development. While the Vlycha area is very near to the archaeological site, Chalivourgiki is in reasonable distance.

Image: Ilias Monacholias

- Protection of available natural areas such as buffer zones between residential areas and industrial/logistics concentrations, and partial municipal management of the coastal front.
- Targeted planning policies, aligned with the Athens Regulatory Plan, to promote Eleusis as an Intermunicipal Center of Wide Influence focused on culture and history — symbolizing the regeneration of land and people (timeless symbols of Demeter).
- Structural interventions in the local economy centered on innovation in energy, decontamination techniques, industrial symbiosis / circular economy, and cultural and creative industries.
- Promotion of sustainable mobility within residential areas and acceptable conditions for supra-local transport needs.
- Urban planning tools for functional and aesthetic upgrading of residential zones and coexistence with industrial activity.
- Restoration of the relationship with Mother Earth and the cycle of life; regeneration of nature and people through protection, promotion, and sustainable use of natural resources (sea, agricultural land, water resources, limited forest formations), and highlighting the spiritual and cultural dynamism of the place.
- Environmental and quality-of-life upgrading.
- Restoration of continuity and cohesion between natural and cultural space, strengthening connectivity between Eleusis and Magoula.
- Promotion of the timeless value of the Eleusinian Mysteries through the advancement of Sciences, Arts, and Healing Practices, and redefinition of the participatory process of the Great Mysteries.
- Utilization of modern industrial heritage and building stock for the development of cutting-edge technologies.
- Leveraging Eleusis' central location and recognition to develop cultural tourism and connections with destinations beyond Athens (Daphni Monastery, Corinth, Mycenae, Epidaurus, etc.).

All this is being proposed just two years after 2023, the year Eleusis was European Capital of Culture. What connection do the Government's plans have with the above vision?

We call upon the municipality of Elefsina and the Greek government to stop and indeed remove the industrial development that is blocking a future inscription of Eleusis on the World Heritage List, and start working on the World Heritage nomination. We have already requested ICOMOS Hellenic to support us and we had their positive reaction with a press release on 16th of last March.

The Russian Orthodox Church is Destroying Tauric Chersonesos

Evelina Kravchenko

The year 2025 brought for the WHS of the City of Tauric Chersonese and its *chora*, located in Russian-occupied Sevastopol, on the one hand, the continuation of the destructive actions of the occupation authorities, which were initiated in previous years[1], on the other hand, the creation of a new regulatory policy of the occupiers in the field of urban planning which concerns cultural heritage sites. In the first direction, we can see the consequences of the violations committed, in the second, we predict catastrophic destructive processes for the cultural heritage located on the territory of Russia as a whole.

On the territory of the ancient city of Tauric Chersonesos, the creation of the St. Vladimir Monastery of the Russian Orthodox Church continued. All activities on the territory of the ancient site were aimed at creating its infrastructure around and inside the former museum premises (Fig. 1). Until 1923, these premises belonged to the monastery, built on the remains of the ancient city in the second half of the 19th century by order of the Russian tsars, so now the occupation authorities have declared them monastic and evicted the museum from there. Russian media reported that the vast majority of the monks of the St. Vladimir Monastery arrived here a little over a year ago from Moscow (Sretensky Monastery) and Pskov (Pskov-Pechersk Monastery).



Fig. 1: Tauric Chersonesos. In the center is the building of the restored St. Volodymyr's Cathedral. *Photo: Chris Williams, 2001*

In historical and architectural retrospect, the development of the central part of the Tauric Chersonesos with monastic buildings, which took place in the 19th century, led to a chaotic episodic study of the archaeological remains in the central part of the ancient *polis*. However, even in the middle of the century before last, a number of large archaeological sites were already known in this part – the basilica of 1861 in the acropolis was discovered, the cross-domed temple (No. 29), part of the city's insula, the main street. Later, the so-called small cistern of the Byzantine period was discovered – a unique structure with numerous graffiti on the walls, among which there is also the sign of the Kyiv princes – the trident, a triapsid cross-domed temple, a Byzantine necropolis[2] (Fig. 2).

Activities related to modern infrastructure projects for the development of the monastery on an archaeological site of the

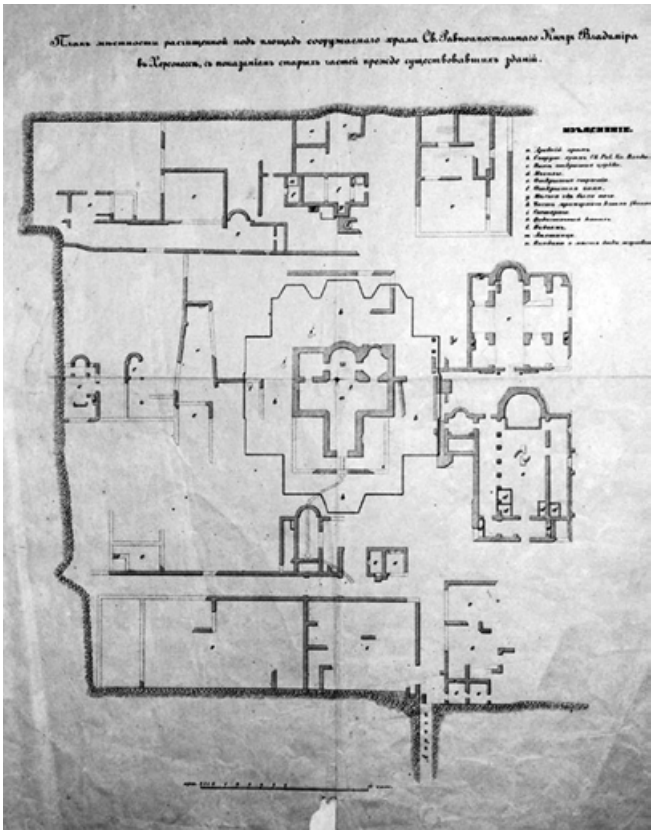


Fig. 2: Plan of the square under the St.Volodymyr`s Cathedral with a drawing of ancient buildings from 1861. *Source: Murzakevich 1863, plate 6*

city of Chersonesos began to be actively carried out by the occupation authorities in 2020. First, excavations were carried out for the restoration project around the Cathedral of St. Volodymyr (headed by A.S. Namoylik and L.A. Kovalevskaya). In 2023-2024, large-scale excavations were carried out in the central part of the Chersonesos for the laying of a heating and a water supply system (Nedelkin E.V., open letter 5850-2023 from the Ministry of Culture of Russia) (Fig. 3, 4). The excavations uncovered a previously unexplored cultural layer and archaeological complexes of the Chersonesos.



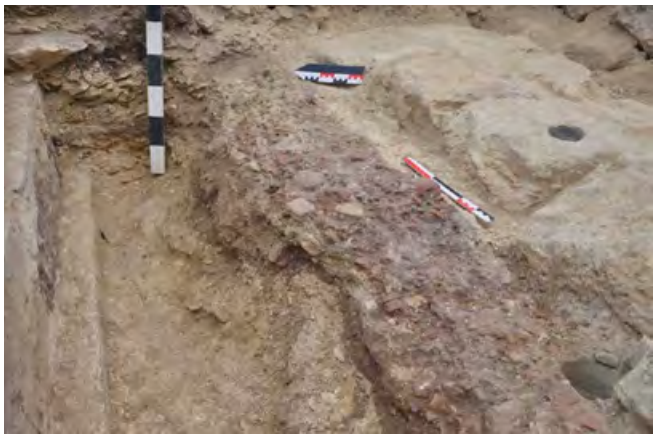
Fig. 3: Trench for laying the heating main to the St.Volodymyr`s Cathedral. Central part of the city of Chersonesos. *Photo: Yuriy Zaitsev, 2023-2024*



Fig. 4: Trench for laying the heating main to the St/Volodymyr`s Cathedral. Remains of medieval and ancient *insula*. Central part of the city of Chersonesos. *Photo: Yuriy Zaitsev, 2023-2024*

In order to create the infrastructure of the monastery, the territory of the National Preserve of the Tauric Chersonesos is undergoing significant changes. In particular, so-called „improvements" are being carried out on the territory of the ancient city. The „improvement" measures include the installation of a wooden deck and a ramp in the area of the Cathedral of St. Volodymyr, the installation of lighting for the monument to St. Volodymyr, recently installed by the occupiers in the center of the Chersonesos. According to the documentation, the improvement project was developed by the Foundation for the Support of the Humanities of the Synod of the Russian Orthodox Church "My History".[3]

The next act of "improvement" was the construction of an elevator for the Volodymyr`s Cathedral. For this purpose, a square was allocated inside the cathedral, where archaeological excavations were carried out. During the excavations, a part of the main street of Chersonesos was discovered with a paving *in situ*, an aqueduct and a flow[4] (Fig.s 5, 6).



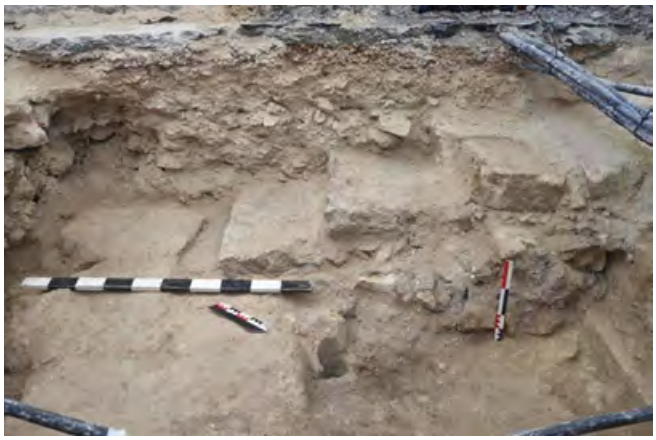


Fig.s 5 and 6: Excavation for the construction of an elevator in St. Volodymyr's Cathedral. Paving of the main street of Chersonesos. Central part of the city of Chersonesos. *Photo: Yuriy Zaitsev, 2025*

In addition, the construction of a stationary border on the territory of the ancient site, which will mark the territory of the monastery, continues. For this purpose, the ancient settlement was excavated to construct border pillars and an entrance group in the central part of Chersonese, in the area of the old monastery buildings and in the port area of Chersonesos.

As I wrote in last year annual report the Tavria Theological Seminary was transferred from Simferopol to the premises of the Chersonesos museum. The National Reserve «Kam`yana Mohyla», located in the Zaporizhia region, was added be occupation authority to the Chersonesos museum as a branch, and part of its collection was moved to Sevastopol with exhibition projects.

The annexation of the Kam`yana Mohyla to Chersonesos took place at the initiative of the Russian Historical Society by order of Vladimir Putin together with historians and representatives of traditional religions of Russia. Almost all scientific events of the museum since 2018 have been organized by representatives of the Russian Orthodox Church or have in their activities a mandatory component of proving the primacy of the activities of the Russian Orthodox Church in Chersonesos and Crimea. Both the annexation of the Kam`yana Mohyla with the churingas and the system of signs of the Bronze and Iron Ages to the ancient and Byzantine Chersonesos, and the definition of Chersonesos as a shrine of Russian Orthodoxy from a historical perspective are meaningless, therefore such measures cannot claim any scientific component.

The monastery was given ownership of a 19th-century church located in the central part of the Chersonesos - the Church of the Seven Holy Martyrs of Chersonesos. The monastery was also given the premises of the Hall of Classics of the National Preserve of the Tauric Chersonesos, which was reconstructed before the occupation and where the exposition of the Classic period of the Chersonesos was re-exhibited. The preserve did not have time to open before occupation, and the occupation authorities immediately attributed the entire process of reconstruction and re-exhibition to themselves and opened the exhibition hall for viewing immediately after the occupation. Now a veranda with a barbecue area has been attached to the premises (Fig. 7).



Fig. 7: Restaurant annex to the Hall of Classics of the museum. *Photo: from Internet*

The monastery management decided to dismantle the *pitosarium* premises from the territory of the preserve, where, in addition to *pythoi* and *amphorae*, Byzantine mosaics and architectural details were temporarily stored. Now there are public catering establishments (kebab shops) and souvenir shops on this site, subordinate to the monastery (Fig.s 8 - 10). In fact, the kebab shops operate on the graves of the founder of the Chersonesos museum, Karl Kazimirovich Kosciuszko-Valyuzhynych[5], and its first and only architect, M.M. Yanyshev. Local residents reported on social networks that the mosaics are currently lying around near the parking lot outside the preserve. Their further destiny is currently unknown. In addition to the kebab shops, the newly established monastery has opened an altar-making school for children over 7 years old, a school of Christian spirit «Griffons».

Part of the Chersonesos collection was taken to Yekaterinburg in 2025, where they are at the Yekaterinburg History Muse-



Fig. 8: Excavation at the site of the dismantled *pitosarium* of the museum, photo from 2017. Wall of the ancient structure at the level of the modern surface. *Photo: from Internet*



Fig. 9: Construction of a new building on the site of the *pitosarium*. *Photo: from Internet*



Fig. 10: Barbecue grills at the site of the dismantled *pitosarium*. *Photo: from Internet*

um's exhibition "Eastern Echelon. The History of the Salvation of the Collections of Ancient Chersonesos." Seventy items from the preserve's collection were transferred to the newly created Russian Art Gallery for exhibition. One can only guess what the point of such an exhibition is since the gallery is located in Sevastopol on one of the piers of the seaport. It is obvious that there are currently no logistical problems for transporting these items from Crimea by sea.

The main collection of Chersonesos is planned to be transferred to New Chersonesos. The full name of this organization according to Russian federal registers is the Autonomous Non-Profit Organization Museum and Temple Complex «New Chersonesos», a private property organization. The owner and general director is Sergey Sergeevich Parodzhanov. The organization's address is the city of Sevastopol, Gagarin Municipal District, Drevnya St., 31, postal code 299045. In 2025, the organization received an award from «Parks of Russia» with the award of the statuette «Girl with a Paddle».[6]

It is currently unclear under which regulatory documents of the occupation authorities the transfer of collections will take place. However, it is not excluded that a special law or regulation will be created for this case, as happened with regulatory documents in the field of urban planning. The reform of legislation on the protection of heritage sites, which took place at the end of last year in Russia, cancels series of regulatory acts that regulated construction in areas of protected zones. In general, there are no more protected zones, only the protected territory remains. For example, the new documents indicate that a necropolis is not a burial place, but a complex of artistically decorated tombstones over burials. This means that all unknown archaeological necropolises are currently effectively deprived of protected status.

New urban planning regulations are currently in effect in Sevastopol, which came into effect at the end of last year (Order of the Ministry of Culture of Russia No. 2049). It significantly increases the possibilities of construction in the area of Chersonesos, the *chora* and other cultural heritage sites. In particular, an archaeological survey before construction is not anymore a mandatory measure. This effectively eliminates any further study of the *chora*, which has only been archaeologically investigated sporadically. According to the new occupation legislation, additional archaeological research is also unnecessary during the construction of infrastructure facilities and engineering networks; the current regulations have increased the permissible height of buildings. In fact, this means that only territories within registered cultural heritage sites will now be subject to site protection measures.

Tauric Chersonesos is used by the occupying authorities as an ideological hub. The executor of all programs is the monastery, created by the occupying authorities. The monastery has occupied all the premises of the museum, destroyed the exposition, and stopped the museumification of the site. For the needs of the monastery's infrastructure, unacceptable archaeological research is being conducted on the territory of the city of Chersonesos. The museum-preserve, created by the occupiers on the basis of the National Preserve of the Tauric Chersonesos, has actually become a service for the needs of the monastery and a cover for changing the intended purpose of the cultural heritage site. The collections of funds that have not yet been taken to Russia, the archive and library of the Chersonesos preserve are being prepared for transfer to the so-called museum and temple complex of New Chersonesos.

The inclusion of the WHS of the city of Tauric Chersonesos and its *chora* on the List of World Heritage in Danger remains the first necessary step for further influence on the occupying country in order to minimize losses to the site. In addition, imposing sanctions against individuals and legal entities that, in violation of international law, implement the projects of the occupying power on the site is important.

Notes

1 world-heritage-watch.org/content/wp-content/uploads/2024/06/WHW-Report-2024-final.pdf ; World Heritage Watch Report 2025 – World Heritage Watch

2 Мурзакевич Н.Н. 1863. Херсонесская церковь Св. Василия (Владимира). Записки Одесского Императорского Общества истории и древностей, т. V. Одесса, с. 996-997

3 Акт государственной историко-культурной єкпертизы документации, обосновывающей мероприятия по обеспечению сохранности обьекта культурного наследия федерального значения — досторимечательного места «Древний город Херсонес Таврический и крепости Чембало и Каламита», обьекта культурного наследия федерального значения «Древний город Херсонес Таврический» (ансамбль), выявленного обьекта культурного/археологического наследия «Городище Херсонеса Таврического», обьектов культурного наследия, расположенных в непосредственной близости от участка проведения работ по благоустройству территории Государственного историко-археологического музея-заповедника «Херсонес Таврический» в 2014 г., расположенного по адресу: г.Севастополь, ул. Древняя, 1».

4 Акт государственной историко-культурной єкспертизы раздела документации, обосновывающей меры по обеспечению сохранности достопримечательного места «Древний город Херсонес Таврический», «Крестообразый храм в акрополе», выявленного обьекта культурного/археологического наследия «Городище Херсонеса Таврического» при производстве работ по сохранению и приспособлению к современному использованию обьекта культурного наследия федерального значения «Собор Святого Владимира», г.Севастополь, ул.Древняя, д.1 (устройство пассажирского лифта).

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6 «Дівчина з веслом» — як символ радянського тоталітаризму та... еротики | Газета «День»

Beyond Conservation: Alaverdi Cathedral, Cultural Heritage and the Rule of Law Crisis in Georgia

Manana Tevzadze, Blue Shield Georgia



Fig. 1: The Alaverdi Cathedral in its setting of vineyards in the Alazani Valley against the backdrop of the Greater Caucasus. Photo: Zurab Tsertsvadze

Although predominantly a cultural landscape, Alaverdi has been included in Georgia's UNESCO Tentative List[1] since 2007 under the title "Alaverdi Cathedral". The Alaverdi Monastery complex, located in the Kakheti region of eastern Georgia, is among the country's most significant religious and architectural monuments and holds the status of a monument of national importance under Georgian legislation. Originally founded in the 6th century by the Assyrian monk Ioseb Alaverdeli, the cathedral dates back to the 11th century and is one of the masterpieces of medieval Georgian architecture and a central element of the wider Alazani Valley cultural landscape. Set against the backdrop of the Greater Caucasus Mountains, the site possesses strong potential for future World Heritage nomination as a cultural landscape due to the exceptional integration of monumental architecture, viticultural land use, and natural topography.

However, this potential has been seriously threatened in recent years by the construction of the "Alaverdi Resort" hotel complex within the monument's physical and visual protection zones. Construction of the large-scale hotel complex, developed by the company Badagoni together with the Alaverdi Diocese, was publicly launched in February 2022 in the immediate vicinity of the cathedral. The ground-breaking ceremony was attended by national and local government representatives together with the Archbishop of Alaverdi, who simultaneously serves as deputy head of the Cultural Heritage Protection Unit at the Patriarchate of Georgia. The hotel, now nearing completion, is located within the monument's visual protection zone and directly affects key views, spatial relationships, and the integrity of the surrounding cultural landscape.

Violations of national heritage legislation and civil society response

Information about the construction of the hotel became public through the news in the media[2], as the project did not pass through the procedures required by the law, such as discussion on a special council and granting of the permission.

According to the Law[3] of Georgia on Cultural Heritage, interventions near protected monuments must comply with regulations concerning physical and visual protection zones as well as historical landscape protection. Article 34(2) refers to physical and visual protection areas of cultural heritage monuments, while Article 34(3) provides for the protection zone of the monument's historical landscape. Article 35(1) further states that the purpose of protection zones is the safeguarding of cultural heritage, historical landscapes, historically established views and panoramas, and the preservation of the monument as a

witness of history. The visual protection zone is defined as a radius of 300 metres for protected monuments, 500 metres for monuments of national significance, and 1000 metres for World Heritage properties. In this case, the hotel falls within the visual protection zone as it is located less than 200 meters away from the listed complex.

After hearing the news, the Georgian National Committee of the Blue Shield initiated a campaign to oppose the construction and issued a statement[4] which was joined by a number of civil society organizations and individual professionals to try to find out whether the project was granted permission, and requested official information from all concerned institutions. Letters of inquiry were sent to the Patriarchate of Georgia, the Ministry of Culture and the National Agency for Heritage Preservation. Despite legally established deadlines for providing public information, the authorities failed to provide responses.

The case was picked up by opposition media and was covered actively[5]. Further statements were made jointly by the heritage civil society organizations in the name of the Heritage Platform[6], a cultural and natural heritage civil society network, which argued that construction works near Alaverdi Monastery should be halted because the project contradicts the requirements of Georgia's Law on Cultural Heritage. According to the assessment, the hotel construction damages the monument, violates the regime of cultural heritage protection zones, and negatively affects the integrity of the site and its surrounding landscape.

The statement also pointed to possible indications of criminal liability under the Georgian Criminal Code, arguing that both actions and inaction by responsible officials may constitute abuse of office and/or professional negligence in relation to the protection of the monument. **The statement also argued that because Alaverdi has been on the UNESCO Tentative List since 2007 and possesses** clear World Heritage potential, the visual protection zone should be understood as extending to 1000 metres rather than the 500-metre radius currently applied.

It later became evident that formal administrative procedures were handled post factum, after construction had already begun and public attention had intensified. Several months after construction works had started, Heritage Platform members learned that the National Agency for Cultural Heritage Preservation had organised a discussion concerning the project where the Archbishop of Alaverdi presented the proposal. The fact that construction activities had already commenced before any such discussion took place intensifies concerns regarding procedural violations and lack of transparency.

As became evident already from the publicly available renderings — and even more clearly now that the hotel is nearing completion — the scale, placement, and visual impact of the development are incompatible with the legal requirements. The project disrupts the cathedral's visual dominance within the Alazani Valley and introduces a large contemporary structure into a historically open landscape. Under Georgian law, such violations may amount to criminal offences under Articles 259/2 and 259/3 of the Criminal Code of Georgia[7] when damage concerns a monument of national significance.

The investigative media outlet "Mtis Ambebi" followed up and repeatedly requested public information related to the project and, after authorities failed to provide documentation, filed a lawsuit against the National Agency for Cultural Heritage Preservation in the Tbilisi City Court in August 2022[8]. Public pressure, petitions, and legal action temporarily halted construction activities. Civil society groups also attempted to use the official petition platforms of the Parliament and Government of Georgia in order to trigger institutional review procedures; however, these platforms were non-functional.



Fig. 2: The Alaverdi Resort complex in the immediate vicinity of the Alaverdi Monastery. Photo: Zurab Tsertsvadze

Documentation obtained through litigation confirmed that the Alaverdi Diocese and company Badagoni had initiated construction without a valid building permit. Only after "Mtis Ambebi" requested information regarding enforcement measures for unauthorised construction within the monument's visual protection zone did the Akhmeta Municipality issue an administrative violation protocol and fine the company. Following several apparently minor modifications to the project, the municipality subsequently granted the construction permit.

Governance failures and broader implications

The governance context of the project further complicates the situation. The construction was actively supported by the Georgian Orthodox Church, which according to the constitutional agreement between the Church and the state is the owner of all ecclesiastic Orthodox heritage sites. However, the responsibility for preserving such sites is shared by the State and the Church. The dual role of the Archbishop of Alaverdi as both diocesan bishop and senior representative within the Patriarchate's heritage structures raises serious concerns regarding conflict of interest and accountability.

Rather than facilitating dialogue with heritage professionals and responding constructively to criticism, Church representatives largely dismissed concerns raised by experts and civil society organisations. Public statements defending the project focused primarily on economic arguments, particularly the claim that the hotel would generate employment opportunities in a region facing economic hardship. While regional economic development is a legitimate concern, framing heritage protection and economic development as mutually exclusive priorities is deeply problematic but a common practice in Georgia.

Legislative gap in protecting cultural landscapes

Alaverdi is not an isolated monument but an integral part of the Alazani River Valley cultural landscape — a rare example of the harmonious relationship between monumental religious architecture, viticultural land use, and natural topography. The cathedral's vertical dominance within the flat valley and its visual connection to the surrounding mountains are essential attributes of its heritage value. However, Georgia still lacks a legal framework specifically addressing cultural landscape protection.

Thus, the Alaverdi case once again exposes a critical void in Georgian heritage legislation – the absence of enforceable cultural landscape protection. This has been evident for a long time now and has led to the loss of many cultural landscapes, such as the Khada River Valley[9], to infrastructural development over the past decades. While individual monuments are legally recognized, the lack of landscape-specific legislation leaves their essential spatial and environmental contexts vulnerable to development. The hotel complex fundamentally degrades the sites' historical sightlines, transforming it and its setting into a mere tourism backdrop. By allowing such incompatible interventions, Georgia is not only damaging a national landmark but actively sabotaging the future World Heritage potential of the entire Alazani Valley as a historically developed cultural landscape. Ultimately, Alaverdi proves that without a legal framework that treats monuments and their surrounding landscapes as an indivisible whole, the country's heritage remains at the mercy of non-transparent governance and short-term commercial interests.

Conclusion and recommendation

The Alaverdi case reflects broader structural problems affecting heritage governance in Georgia, including weakening institutional safeguards, marginalization of independent expertise, the absence of effective cultural landscape protection mechanisms, increasing politicization of decision-making processes, and the near-total erosion of meaningful space for civil society participation.

Threats to cultural heritage in Georgia can therefore no longer be understood solely as isolated conservation failures, but must be seen within the wider context of democratic backsliding, weakened rule of law, institutional capture, and the erosion of transparent decision-making and accountability mechanisms that directly affect the protection of cultural landscapes and monuments of national and global significance.

International professional organizations, donor institutions, and partners supporting governance and rule of law reforms in Georgia should recognize culture and heritage protection as an integral part of democratic governance rather than a separate technical field. Both they and the Georgian civil society should try to make sure that the rule of law debate extends to include the cultural debate.

At the same time, sustained support for Georgian civil society, investigative media, and independent heritage professionals remains essential to safeguarding both the country's cultural heritage and the public interest mechanisms necessary for its protection.

Notes

1 https://whc.unesco.org/en/tentativelists/5221
2 https://blueshield.ge/?p=9221&lang=en
3 https://matsne.gov.ge/en/document/download/21076/8/en/pdf
4 https://blueshield.ge/?p=9207&lang=ka
5 https://www.youtube.com/watch?v=oMEO5wnOvjo&t=20s
6 https://publika.ge/article/shesadzlo-samokheleo-danashauli-specialistebi-ala-verdtan-sastumros-msheneblobaze/
7 https://matsne.gov.ge/en/document/download/16426/157/en/pdf
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Reports on Ongoing Construction and Road Development in the Saint Catherine Area

Anonymous

This note is submitted as a supplementary update to the serious concerns already raised in the 2024 and 2025 World Heritage Watch reports on the physical transformation of the landscape within the Saint Catherine Area World Heritage Site and consequent damage to the Site's OUVs, through the Great Transfiguration Project / Revelation Initiative.

The purpose of the note is to draw attention to fact that developments apparently continue within the Site in contravention of the State Party's commitments and the WHC's Decision 45 COM 7B.138 which requested that "Further developments included in the 'Great Revelation Initiative – the Land Peace' be halted" until a Heritage Impact Assessment (HIA) is undertaken.

While it has proved difficult to obtain supporting documentation or photographs from the Site for reasons addressed in earlier reports, anecdotal evidence shows that development has continued within the WH Site since the 2025 report, without regard to the consequent negative impacts on the Site's Outstanding Universal Values.

Two developments that have been reported by an anonymous and unverified local source are examples of the continued development.

1. The construction of a new and extended checkpoint near Nabi Saleh together with a new approach highway connected to the revamped airport. Though the airport lies outside the boundaries of the WH Site the highway has cut through natural landscapes within the inscribed property.
2. A large compound with thick concrete walls has been erected within the Milga Bedouin village, visually and physically impacting this cultural landscape. The purpose of this compound remains unknown, but it is locally speculated it may be a base station for a téléphérique to the summit of Abbas Pasha.

Publicly accessible satellite imagery of the Site is historical and does not show these developments. This note does not provide evidence of the function or operation of these structures but wishes to draw attention to the ongoing impact of these reported constructions and new road alignments. These recent developments need investigation as part of a wider UNESCO mission to assess the cumulative physical transformation of the Saint Catherine Area World Heritage Site and the living cultural landscape of the Jabaliya Bedouin community.

Recommendation

The 2021 UNESCO Advisory Mission to Egypt did not visit the property, a missed opportunity for averting the present situation. In the light of the above, it is now urgently recommended that a Reactive Monitoring Mission to the Site is conducted as a matter of priority to avert further impacts on the Site's OUVs and for the mitigation of these impacts.

Proposed Chattra on Borobudur's Main Stupa: A Threat to its Authenticity and Integrity

Catalin Ivancov

The Borobudur Temple Compounds (Indonesia, C 592), inscribed on the UNESCO World Heritage List in 1991, is the world's largest Buddhist temple and one of the greatest monuments of human civilization. Constructed during the Sailendra Dynasty in the 8th–9th centuries CE, it represents a masterpiece of Buddhist architecture and art recognized under criteria (i), (ii), and (vi) of the World Heritage Convention.



Fig. 1: Borobudur temple, view of the main stupa. Photo: Ling Hua

Since 2023, the Indonesian Government has been actively pursuing the installation of a *chattra* — a tiered parasol finial — atop the existing stone *yasthi* (central spire) of the main top stupa (*mahastupa*). A *chattra* is a multi-tiered ceremonial umbrella that symbolizes inner protection, glory, and perfect compassion and wisdom in Buddhism. For many Buddhists, a stupa without a *chattra* is likened to 'a king without a crown', a form of noble offering to the Buddha that is incomplete.



Fig. 2: *Chattra* finial at the world's oldest stupa, in Sanchi (India). Photo: Wikipedia CC

Following a first attempt to install the structure in September 2024, which was postponed due to strong archaeological objections and structural concerns, the government has resumed the process with renewed urgency. As of early 2026, preparatory works on the main stupa for the *chattra* installation have reportedly begun, and government officials have publicly announced the installation as imminent.

To date, no Heritage Impact Assessment (HIA) has been formally submitted to the UNESCO World Heritage Centre (WHC) for review by its Advisory Bodies, as required under §§ 118bis and 172 of the Operational Guidelines for the Implementation of the World Heritage Convention. ICOMOS Indonesia has confirmed it is not aware of any formal notification or consultation with the World Heritage Committee or its Advisory Bodies regarding this proposed intervention.

The Proposed Intervention

The proposed *chattra*, named by its designers the "Chattra Triratna Dasabhumi," would be installed on top of the existing ancient *yasthi* of the main *stupa*. The agreed design measures 6.2 m in height and 1.5 m in width, is made of bronze and stainless steel, and would be gilded. The design comprises 10 octagonal bronze rings symbolizing the 10 stages of Buddhist awakening (*dasa-bhumi*), topped by three gilded disc-shaped canopies (*cakravali*) symbolising the Three Refuges (*triratna*) of the Buddhist faith. This is not a stone reconstruction using original archaeological material; it is an entirely new metallic structure.

The initiative has been driven primarily by the Directorate General of Buddhist Community Affairs (Bimas Buddha) under the Indonesian Ministry of Religious Affairs, with the stated aim of fulfilling the spiritual aspirations of the Buddhist community and transforming Borobudur into a living Buddhist pilgrimage site.



Fig. 3: Scaffolding for Technical Study of *Chattra* Installation on the Main *Stupa* of Borobudur Temple.

Photos: BRIN Indonesia, 2024

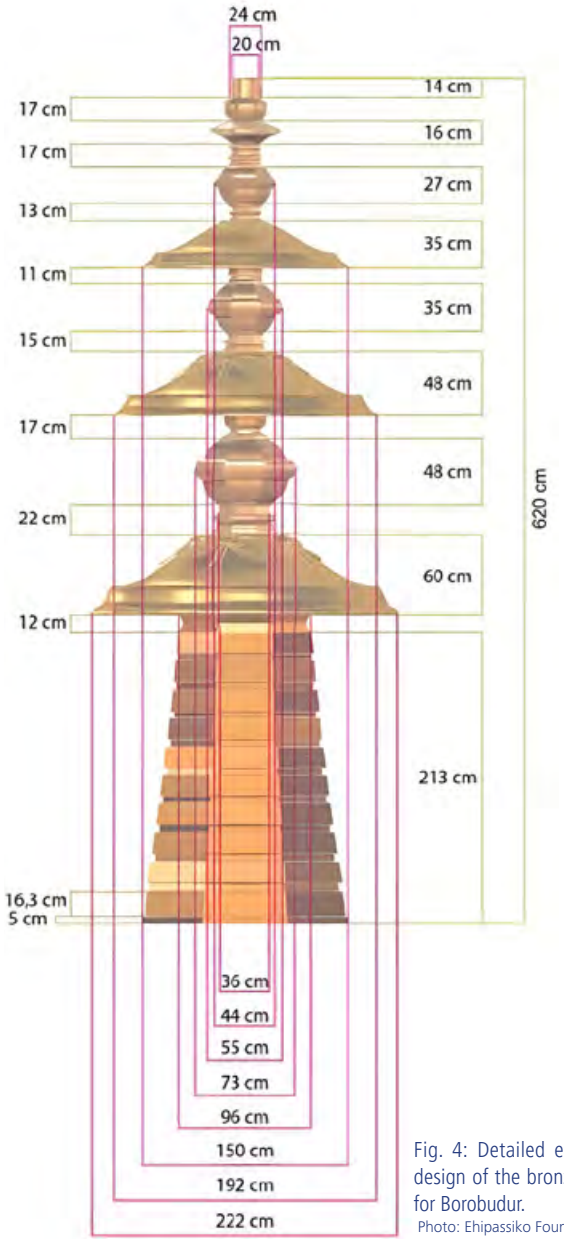


Fig. 4: Detailed engineering design of the bronze *chattra* for Borobudur.

Photo: Ehipassiko Foundation, 2026

The key timeline of this initiative is as follows:

- 2023: Ministry of Religious Affairs publicly announces plans to install a *chattra*; BRIN (Indonesian Research and Innovation Agency) commissioned to prepare a technical study.
- September 2024: Planned inauguration on 18 September 2024 postponed following objections from archaeologists, the Association of Indonesian Archaeologists (IAAI), local communities, and BRIN's own technical assessment, which concluded that original stone material was not sufficiently intact for reconstruction.
- December 2025: Focus Group Discussion held at the Ministry of Culture, gathering archaeologists, Buddhist leaders, BRIN, UNESCO Jakarta, and ICOMOS representatives. While UNESCO requested deeper conservation studies and inclusion of the global Buddhist community, government officials continued to express strong support for proceeding.
- February 2026: Ministerial strategic partnership announced between the Ministries of Culture and Tourism, confirming that *chattra* 'adaptive' installation is "being finalised" as part of a wider programme to attract 17 million international visitors by the end of 2026.
- Early April 2026: Preparatory works on the main stupa for installation reportedly began, including scaffolding operations visible on the monument, as noted by local community groups such as 'Kandang Kebo' cultural advocacy.

Key concerns:

Lack of archaeological evidence for the chattra

There is no complete or detailed archaeological documentation demonstrating that Borobudur's main stupa ever originally featured a *chattra*, as required by § 86 of the Operational Guidelines, which states that reconstruction of archaeological remains is acceptable "only on the basis of complete and detailed documentation and to no extent on conjecture."

This uncertainty is not contested: it was precisely the reason Dutch restoration engineer Theodoor van Erp dismantled the *chattra* he had tentatively reconstructed during the 1907–1911 restoration, after concluding there was insufficient evidence. Van Erp's reconstructed stone *chattra* (which used only 42% original material according to BRIN analysis) is now stored in the Karmawibhangga Museum near the site. The current proposal does not use this stored material but proposes an entirely new metallic adaptive structure as an alternative to full archaeological reconstruction.

BRIN researchers and Indonesian archaeologists, including leading experts from Universitas Gadjah Mada (UGM), have publicly confirmed there is no scientific consensus that a *chattra* existed on the original monument. The Association of Indonesian Archaeologists (IAAI) has called for cancellation, not merely postponement, of the installation plan.

Lack of Heritage Impact Assessment

The World Heritage Committee's most recent Decision on Borobudur (47 COM 7B.74, 2025) explicitly "reminds the State Party to submit to the World Heritage Centre, in accordance with §§ 118bis and 172 of the Operational Guidelines, detailed information on any proposed and ongoing projects, including Heritage Impact Assessments … for review by the Advisory Bodies, before any decision is made that would be difficult to reverse." This instruction has not been followed with respect to the *chattra* installation. ICOMOS Indonesia has confirmed it has received no formal notification from the State Party on this matter.



Fig. 5: Future bronze *chattra* structure finalised, March 2026.
Photo: Young Buddhist Association (YBA) Indonesia

An internal HIA was commissioned by the Ministry of Religious Affairs, but this document has not been made publicly available for independent review, and it is not understood to have been submitted to the WHC. Moreover, leading Indonesian archaeologists, including Prof. Daud Aris Tanudirjo, have raised serious doubts about the independence and comprehensiveness of this assessment, noting that it failed to address multi-dimensional implications including the property's OUV, structural integrity, Borobudur's status as a World Heritage site, and Indonesia's international conservation commitments.

Insufficient structural integrity

The BRIN technical assessment that led to the postponement in September 2024 found that the condition of the main stupa's stonework is compromised, with stones being fragmented and lacking structural interconnections. The Coordinator of the Borobudur Heritage Conservation Office (MCB) stated that BRIN's analysis concluded the structure of the main stupa "is very weak and very dangerous" if the *chattra* is installed.

The proposed bronze and steel structure weighs approximately 800 kg. Indonesia is situated in one of the world's most seismically active zones. The Borobudur region has historically been affected by volcanic ash from Mount Merapi and by earthquakes. The absence of comprehensive structural integrity testing, including seismic risk assessment, before preparatory works commence directly threatens the Outstanding Universal Value of this irreplaceable monument.

Process driven by tourism and religious politics, not conservation

The timeline of the initiative reveals that the primary drivers of the *chattra* proposal are not conservation-based. Government communications have explicitly framed the *chattra* as a means of transforming Borobudur into a "living heritage" site to attract international pilgrims and tourists, in line with Indonesia's ambition to receive 17 million international visitors by end-2026. At the same time, the project has been politically championed at the highest levels, with the Indonesian President Prabowo Subianto personally enquiring about progress during the visit of French President Macron in May 2025.

This framing is consistent with a broader pattern of concern noted repeatedly by the UNESCO World Heritage Committee. The 2025 Reactive Monitoring Mission and Committee Decision 47COM7B.74 both "regret that the State Party has completed a series of significant projects within and around the property, despite its repeated request to halt construction and carry out the appropriate assessments." The proposed *chattra* installation

represents the latest in this pattern of acting first and seeking authorization afterwards.

Divided stakeholder opinion

Not all Buddhist communities in Indonesia support the installation. Buddhist monks and the Young Buddhist Association have expressed that the *chattra* should only be installed if there is clear archaeological evidence and expert consensus, and that "rushing the structure's installation at the historically significant temple would undermine Buddhist principles of compassion." Local communities in Borobudur village, such as the *Ruwat Rawat Borobudur* indigenous cultural association, have also called for postponement, noting the historical and authenticity stakes for the whole world, not just for Buddhist devotees. The position taken by the Borobudur village community underscores a broader principle in heritage governance: All stakeholder communities must be meaningfully included in decision-making processes in line with the Nara Document on Authenticity (1994).

Borobudur Temple Compounds is a World Heritage property belonging to all humanity. As Indonesia itself declared at the outset of the international campaign to save Borobudur in the 1950s and 1960s, its stewardship is a responsibility shared globally. No fewer than 23 countries and international institutions contributed to the 1973–1983 restoration, giving the international community a legitimate interest in how the monument is managed.

Recommendations

In this context, it would be appropriate to urge the State Party of Indonesia to suspend any preparatory or installation works related to the *chattra* until all relevant procedural requirements have been properly fulfilled. Furthermore, it is recommended that a full and independent Heritage Impact Assessment be undertaken in accordance with the ICOMOS/UNESCO Guidance and Toolkit for Impact Assessments in a World Heritage Context, and submitted to the World Heritage Committee for review by the Advisory Bodies prior to any intervention. Such an assessment should comprehensively address the Outstanding Universal Value of the property and its attributes, issues of authenticity and integrity, potential structural and seismic risks, the lack of conclusive archaeological evidence for the *chattra*, the reversibility of the proposed intervention, and the broader, multi-dimensional impacts, including those related to Indonesia's cultural diplomacy and international heritage commitments. In addition, formal consultations should be initiated with UNESCO's World Heritage Centre, ICOMOS, and the wider international Buddhist community, including stakeholders beyond Indonesia, in line with the recommendations made by UNESCO's representative during the December 2025 Focus Group Discussion.

Update: As of April 2026, the ICOMOS Indonesia National Committee has issued a statement expressing concerns regarding the current state of conservation of the Borobudur Temple Compounds, specifically in relation to the proposed chattra structure. The statement has been formally submitted to the UNESCO World Heritage Centre.



Fig. 6: 'Who actually owns Borobudur?', Public Discussion. Ruwat Rawat Borobudur Indigenous Community, April 2026. Photo: Ruwat Rawat Borobudur Association

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II. Historic Cities and Urban Ensembles

LNG Extraction and Climate Vulnerability Converge at the Island of Saint-Louis

Katharine Mastriano

UNESCO inscribed the World Heritage site of L'île Saint-Louis under Outstanding Universal Value cultural criteria (ii) and (iv) in 2000, emphasizing the site's historic, economic, and cultural impacts on West Africa. Located on the northwest coast of Senegal, The Island of Saint-Louis faces worsening environmental threats due to rising sea levels, coastal erosion, and flooding. For more than a decade, the fishermen of the Langue de Barbarie, one of Senegal's largest fishing communities, have faced losing their livelihoods due to climate-related tragedies and, more recently, imposing threats from the Grand Tortue Ahmeyim (GTA) Liquefied Natural Gas (LNG) Project. For over a year, the fishing communities have expressed their complaints and concerns about environmental and social impacts to the project's key stakeholders, British Petroleum (BP) and Kosmos Energy. In full operation, Phase I of the GTA Project poses significant risks to the marine ecosystem, the artisanal fishing economy, and the site's cultural and architectural integrity.



Fig. 1: The Grand Tortue Ahmeyim Project visible from the coastline of the Langue de Barbarie. Photo: Erica Bower / Human Rights Watch, 2025

The Grand Tortue Ahmeyim Project

Described as one of deepest[1] and most complex offshore gas developments[2] in Africa, the Grand Tortue Ahmeyim Project spans the maritime border between Senegal and Mauritania with a production capacity of 2.3 million tonnes of LNG per annum (mtpa). Still operating in Phase I, plans for further production could increase the amount to 2.5-3 mpta in Phase II.[3] However, the project's infrastructure disturbs vital surrounding ecosystems and biodiversity, particularly through the BP-constructed gas platform and pipeline, which transport gas across one of the world's largest identified cold deep-water coral reef systems.[4] This reef is home to at least 150 macrobenthic species.[5] The Netherlands Commission for Environmental Assessment (CNEE) found that the Environmental and Social Impact Assessment (ESIA) for the Grand Tortue Ahmeyim Project lacked sufficient analysis of impacts on the marine and coastal environment as well as the regional socio-economic factors. These gaps hinder a comprehensive assessment of the area's vulnerability, magnitude of consequences, and mitigation strategies.[6]

2015	The discovery of natural gas in an ultra-deep offshore reserve straddling Senegal and Mauritania.
2016	The Société des Pétroles du Sénégal (Petrosen), the Société Mauritanienne des Hydrocarbures et de Patrimoine Minier (SMHPM), Kosmos Energy with a 26.8% share, and BP – currently the project's operator and majority stakeholder with a 56% share — formally joined the initiative.
2017	BP project engineering and planning.
2018	FID (Final Investment Decision) 5[7] and Phase I initiation.
January 2025	Production began.
February 2025	First gas leak[8] detected from the GTA A02 well–largely methane.[9]
April 2025	The first gross LNG cargo was exported.[10]
December 2025	BP and partners announce the installation of an artificial reef[11] off the coast of Saint-Louis.
February 2026	The UK NCP of OECD publishes initial assessment.[12]
2027 and beyond	Phase 2 is expected to add between 2.5 and 3 mtpa of LNG capacity, increasing to more than 5 mtpa.[13]

Restricted access to the Diattara fishing zone

The floating liquefied natural gas (FLNG) platform, located 10 km offshore, is visible from the shoreline and has significantly altered the coastal landscape. It is built directly on Diattara, an area that has long served as a vital fishing zone for artisanal



Fig. 2: The Fishermen of Guet Ndar (Langue de Barbarie) organized under the Association of Artisanal Line Fishermen of Saint Louis (APALSL) protesting BP and Kosmos Energy.
Source: Lumière Synergie pour le Développement

fishermen. In Saint-Louis, approximately 90%[14] of the population depends on the fishing industry for their livelihoods, spanning activities such as fishing, processing, and transportation. However, the 500-meter security perimeter surrounding the platform now restricts access for fishermen from the Langue de Barbarie, effectively cutting them off from this critical zone. Diattara holds economic importance as well as deep cultural significance for the community of Saint-Louis.

In a press release from September 2025, Lumière Synergie pour le Développement (LSD) reported that BP would install an artificial reef 4 km[15] from the coast, yet, local fishermen argue that this solution is unsustainable. As a result, the GTA Project poses a serious threat to both the tangible and intangible heritage of Saint-Louis, placing additional strain on the sector's infrastructure.

Intersecting social and environmental consequences

In Senegal, fish account for almost 70%[16] of animal protein consumption and play a crucial dietary role in a larger region experiencing increasing food insecurity.[17] Restriction on fishing activities in the Diatarra zone have cascading effects on those directly and indirectly employed by the industry. "Fishermen say they used to make between $445 and $625 from a single fishing trip, but nowadays, they struggle to get $90."[18] As opportunities in the fishing sector decline, young men have been driven to migrate[19] by pirogue to the Canary Islands and Europe, contributing to an ongoing humanitarian migratory crisis in West Africa. In a recent study conducted by Afrobarometer, 48% of the Senegalese respondents had thought about emigrating to another country which augmented by 7% from 2017.[20] Two-thirds of the respondents were between the ages of 18-35 and 70% cited the pursuit of finding better opportunities as their reason.[21] "We are forced to continue our fishing activity, because we have no other choice, but if a job opportunity arises, we will seize it without hesitation."[22]

Caught between economic necessity and limited alternatives, the fishing communities remain vulnerable.

This socioeconomic strain is compounded by the environmental risks associated with the GTA Project as it threatens to emit large quantities of harmful pollutants into the atmosphere. The GTA reserves hold almost 425 billion cubic meters of fossil gas[23] with BP contemplating further development in the basin consequently increasing the capacity to 1,133 billion cubic meters of gas. When burned, the reserves would release approximately 2.2 billion tons of CO2 emissions, "equivalent to 0.3-1%[24] of the remaining global carbon budget left to keep warming within a 1.5C rise."[25] The GTA Project poses significant risks to nearby UNESCO-recognized sites, including Senegal's Djoudj National Park and Mauritania's Banc d'Arguin National Park, which lie within the zone at risk of experiencing its adverse environmental impacts. Both of these sites are known for critical wetlands, fragile coastal and marine ecosystems, and major migratory bird habitats, with 248[26] recorded species that migrate to, or through, Senegal each year as they travel along the East Atlantic Flyway.

Next steps for mediation and potential action

In August 2024, the UK National Point of Contact (NCP) for The Organisation for Economic Co-operation and Development (OECD) received a formal complaint from Lumière Synergie pour le Développement and Gaalou Guett or Association of Artisanal Fishermen of the Langue de Barbarie. After a year and a half of communication between the UK NCP, BP and Kosmos Energy, and LSD/Gaalou Guett, the UK NCP drafted the initial assessment with factual comments and officially published it in February 2026.[27]

The UK NCP will offer mediation to both parties with the understanding that they could conduct a further examination of the complaint[28] which would determine whether the stakeholders have adhered to OECD Guidelines. LSD states that this decision

does not obstruct the path of development but rather acknowledges the legitimacy of the concerns raised by the communities, underscores the lack of due diligence on human rights, and neglects the management of the social and environmental impacts during operations.[29]

Conclusion

As LNG activities progress, we urge the World Heritage Centre to request that the State Parties thoroughly revisit the recommendations made in Decision 47 COM 7B.162. The Decision states that the State Party continues consultation with the World Heritage Centre and their Advisory Bodies in cooperation with BP, discussing sustainable monitoring of economic, social, and environmental impacts of this project. Furthermore, it urges the State Party to provide additional information regarding the commitments that ecological and heritage issues would be taken into account and "provide information to all government bodies involved in heritage prerogatives to protect the property."[30]

We urge the World Heritage Centre to revisit the ESIA for a more current and in-depth analysis, particularly following the gas leak in February 2025. BP claimed that the environmental risk was minimal but LSD questioned whether only an independent assessment could verify the claim.[31]

Lastly, as the coastlines of the Langue de Barbarie continue to experience significant structural deterioration, it is essential to implement protective measures before the city's infrastructure is directly affected by climate change and the impacts of the GTA Project. We urge the World Heritage Centre to request the State Parties to invite a monitoring mission to visit the Langue de Barbarie and L'île de Saint-Louis with particular concern regarding the coastal and architectural integrity.

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Historic Centre of Vienna, Austria

Herbert Rasinger, Initiative Stadtbildschutz

The high-rise building project "Heumarkt" is still too high

In July 2017 the UNESCO World Heritage site "Historic Centre of Vienna" has been put on the List of World Heritage in Danger. The reason was that the city of Vienna deliberately disregarded the recommendations of the UNESCO WHC.

The State Party Austria neglected the decision 40 COM 7B.49 which reads as follows:

> The World Heritage Committee,
> 8. Urges the State Party to halt any further approvals for high-rise projects, pending the preparation of the revised planning rules, and submit the proposed designs and related HIAs for any future high-rise projects to the World Heritage Centre for review by the Advisory Bodies, in accordance with Paragraph 172 of the *Operational Guidelines*;
>
> 9. While noting the State Party's decision not to pursue the land use planning procedures for the proposed Vienna Ice-Skating Club – Intercontinental Hotel – Vienna Konzerthaus project, nevertheless expresses its concern that the proposed project remains inconsistent with the recommendations of the 2012 mission and would adversely affect the OUV of the property,

This 2012 Mission states under item 4.1.2.

> Currently, this hotel strongly disturbs the famous view from Belvedere. Therefore, **no increase to the buildings height** should be aimed at in connection with the redo. On the contrary, it is warmly recommended to use this opportunity to **reduce the height of the building** and therefore reduce its negative visual impact.

The city of Vienna granted the real estate developer Tojner/Wertinvest permission to increase the building height from 38 m to 79 m. The result can be seen the below this rendering.

The recent State of Conservation Report dated 11 February 2026, submitted by the Republic of Austria gives cause for severe concern.

The report not only entirely ignores any development after 2023, including the UNESCO Mission to Vienna in 2024 and its findings, but draws an inaccurate picture of the **current legal situation**.



Fig. 1: Two high-rise buildings planned in the core zone of the word heritage site „Historic Centre of Vienna". *Rendering: Initiative Stadtbildschutz*



Fig. 2: St Charles Church and vicinity. The Wienmuseum with the new superstructure at the left, the red lines show the planned 3-floor superstructure on top of the Winterthur house. *Photo: Initiative Stadtbildschutz*

This year, the Austrian Federal Administrative Court (Bundesverwaltungsgericht) decided on 31 January 2026 against the City of Vienna's decision regarding the Environmental Impact Assessment (Umweltverträglichkeitsprüfung; UVP) for the project version of 2023. The decision of 31 January 2026 was based on an assessment by Birgitta Ringbeck, commissioned by the Federal Court, stating that the 2023 project still poses **significant danger** to the World Heritage site.

In sum, the mayor of Vienna, Mr. Michael Ludwig, issued 3 times declatory rulings (on 16 October 2018, 13 August 2024 and 12 November 2024) in favor of the real estate developer Tojner/Wertinvest which would exempt him from the duty to make the prescribed Environmental Impact Assessment for his high rise building project. **All three declatory rulings were not successful in the courts**:

The first declatory ruling war rebuted by the decision of 25 May 2023 of the **Court of Justice of the European Union in the Heumarkt case** C575/21 and the second ruling was rebuted by the decision of the Federal Administrative Court (Bundesverwaltungsgericht) on 3 November 2025 and the third ruling was rebuted by the same court in the decision on 31 January 2026.

The result of these three decisions is that not only the UNESCO and ICOMOS experts refuse the Heumarkt high-rise building project, but also the legal system in Austria. The legally prescibed environmental impact assessment is thus necessary.

The Karlsplatz – Sourrounding new superstuctures on top of the adjacent buildings dwarf the St Charles church

Although the State Party of Austria should have delivered the plans of the WMN (Vienna Museum New) before the start of its construction, the State Party submitted to the WHC of UNESCO the plans **too late** – in February 2024, 2 months after the building had already been constructed and opened to the public on 6 December 2023. Please see the museum in the far left in the photo below.



Fig. 3: Newly built subway entrance in the University street in the core zone of the World Heritage site. *Photo: Initiative Stadtbildschutz*



Fig. 4: Nearly invisible subway entrance built in 1989 next to the Natural History Museum in the core zone of the World Heritage site. *Photo: Initiative Stadtbildschutz*

The visual impression of the most important baroque church in Vienna, the Saint Charles Church, is impaired by the unnecessary upscaling of the surrounding buildings as e.g. the Wienmuseum of the city of Vienna in 2023. Now, the owner of another building adjacent to the Saint Charles Church, the office building (Winterthur house) has been allowed by the City of Vienna in its land use plan P.D.8190 to add three stories, just like the Wienmuseum was allowed in 2023.

Unnecessary huge subway entrances in the core zone of the world heritage site

The Management Plan of 2021

Measures to be taken according to the 2021 Management Plan (page 133) on paper, are

- Public relations and
- Promotion of awareness of the heritage site
- but have not been realized.

It is regrettable that

- no information brochures on the world heritage site
- no dialogue formats to communicate the world heritage attributes
- no training materials for the involvement of pupils, students and young people have been produced.

Recommendations

- Reduce the building height of the planned high-rise buildings to 38 m, the maximum allowable building height since 1964. This is the “acceptable threshold” defined in 1964 and reaffirmed by the Reactive Monitoring Mission 17-20 September 2012, item 3.2.1.2.
- Abolish land use plan P.D.8190 allowing the superstructure on top of the adjacent Winterthur office building next to the St. Charles Church.
- Implement the public relations and awareness-raising measures of the world heritage site as promised in the management plan 2021 on page 133.

St. Petersburg: Two New Skyscrapers Threaten to Ruin the Protected Skyline

Anonymous



Fig.1: Visualisation of the three towers by the authors of the project, 2024. Photo: dp.ru



Fig. 2: Visualisation of the second 703-metre skyscraper based on the photograph of the existing 462-metre skyscraper, 2021. Photo: Kanoner

Genereal information about the project

Plans to construct the second skyscraper, 'Lakhta 2', in Lakhta, adjacent to the already completed 'Lakhta Centre' skyscraper, first came to light in May 2021, whilst plans for the third, 555-metre-tall 'Lakhta 3', were announced in December 2021.[1] In June 2024, Alexey Miller, Chairman of the Management Board of PJSC Gazprom, showed Russian President Vladimir Putin a visualisation of the two future skyscrapers, 'Lakhta 2' and 'Lakhta 3'.[2]

In June 2025, agreements were signed to provide the 'Lakhta Centre' complex with transport and engineering infrastructure facilities.[3] The exact location of the planned skyscrapers was officially announced in the draft Territory Planning Project for the area of the 'Lakhta 2' and 'Lakhta 3' construction sites, hereinafter referred to as PPT,[4] and in its supporting materials.



Fig. 3: The construction site is indicated with an arrow on the map of the elements of the World Heritage site 540-025b 'The Village of Olgino' and 540-034j 'Primorskoye Highway'. Map: State Party/Russian Federation



Fig. 4: Superimposition of the borders of Elements No. 540-025b 'The Village of Olgino' (in crimson) and No. 540-034j 'Primorskoye Highway' (in green) on the Territory Planning Project (2026) with the two future towers. Map: Author of the report.

Legal procedure for project approval

1. Compliance with historical and cultural restrictions and requirements

1.1. Most of the area designated for the planned construction of the skyscrapers falls within the boundaries of Element No. 540-025b 'Olgino Village' of the World Heritage property 'Historic Centre of St Petersburg and Related Groups of Monuments'. Furthermore, to the west of the two skyscrapers, also within the boundaries of Element No. 540-025b, there are plans to construct a multi-level road junction, which will destroy several blocks of the village of Olgino.

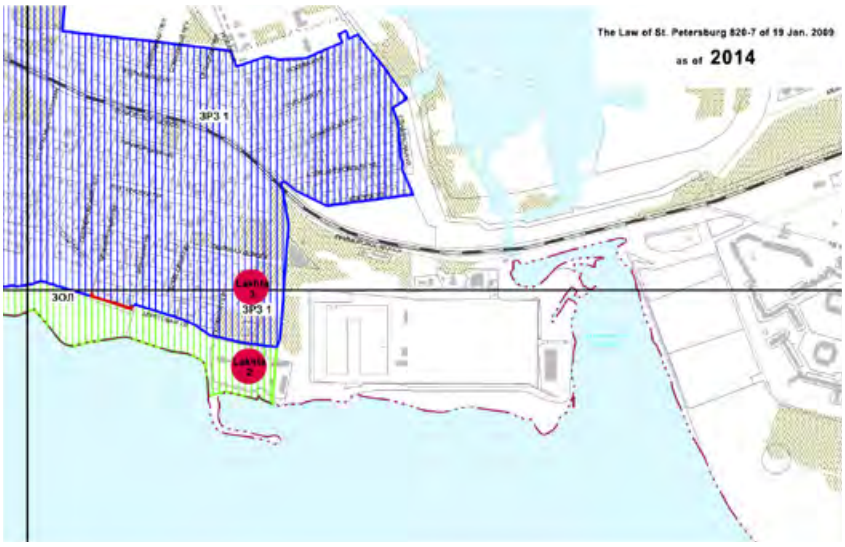


Fig. 5: Protection zones in the Law of St. Petersburg No. 820-7 of 19 January 2009 (as of 2014): In blue: protection zone of development regulation (ZRZ(34)01). In green: protected landscape zone (ZOL(34)01).
Map: Law of St .Petersburg 2014

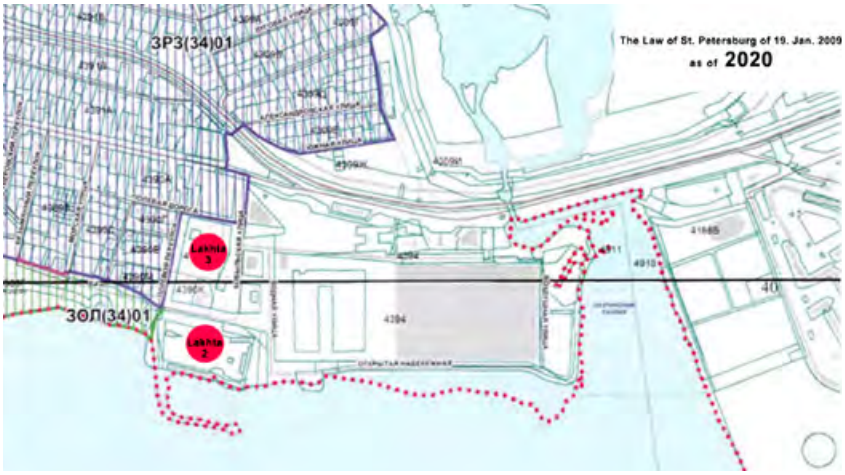


Fig. 6: Protection zones in the Law of St. Petersburg No. 820-7 of 19 January 2009 (as of 2020): In blue: protection zone of development regulation (ZRZ(34)01). In green: protected landscape zone (ZOL(34)01).
Map: Law of St. Petersburg 2020

Despite this, there are no plans to comply with the requirements of §172 of the Operational Guidelines for the Implementation of the WH Convention in relation to large-scale new construction within the boundaries of the World Heritage site's components. This is because the executive authorities of St Petersburg consider the Convention to be a non-self-executing international treaty requiring implementation at the level of national legislation. An assessment of their arguments is provided in the analytical note.[5] The information set out in the note allows us to conclude that both the Convention and the Operational Guidelines are self-executing international treaties of the Russian Federation and are subject to implementation regardless of whether or not national legislative acts implementing them have been adopted.

1.2. One consequence of the failure to implement the provisions of the Convention within the territory of the Russian Federation is the absence of buffer zones around World Heritage sites.

Some experts believe that, for St Petersburg, the absence of buffer zones is largely offset by the existence of protection zones for St Petersburg's cultural heritage sites[6] (hereinafter – protection zones, Protection Zone Regimes), and that 'virtually all components of the property located within the territory of St Petersburg are protected by a comprehensive system of protection zones'.[7] Taking elements No. 540-025b 'Olgino Village' and No. 540-034j 'Primorskoe Highway' as an example, it is clear that this is not the case.

Before 2020, the area of the 'Lakhta 2' and 'Lakhta 3' construction used to fall within the boundaries of the two protection zones: ZRZ(34)01-1 development regulation zone and ZOL(34)01 protected landscape zone. But in 2020, the construction site was cleared from any protection zones whatsoever.[8]

To the west of Polevoy Lane, on the site of existing private houses — which also form part of element No. 540-025b and are situated within the boundaries of the ZRZ(34)01-1 protection zone — a road junction is planned to serve visitors to the skyscrapers[9] (See Fig. 4).

The land beneath these private houses will be expropriated for 'public use', and the houses that form the character of the village of Olgino will be demolished (Fig.s 7, 8). Thus, even though it lies within the protection zone, part of element No. 540-025b will be completely destroyed to make way for a multi-

level interchange, as the regulations for this zone do not protect the historically established 1- and 2-storey cottage-style development.



Fig. 7/8: Residential houses in the village of Olgino. Photo: Irina Smirnova

1.3. However, an even more important issue from the point of view of cultural heritage preservation is the preservation of the panoramas of the historic centre of St. Petersburg.

According to officials from the Committee for State Control, Protection and Use of Historical and Cultural Monuments of St Petersburg (KGIOP),[10] the restrictions of the protection zones do not apply to the construction of any structures outside the boundaries of these protection zones, as if visibility outside the protection zones were to drop sharply to zero and structures of any height could be built there.

1.4. The planned construction site also does not fall within the boundaries of the historic settlement of St Petersburg.[11] Under the current protection regime for the historic settlement of St Petersburg, a number of panoramas are formally protected; these have already been disrupted by the appearance of the 'Lakhta Centre' and will be disrupted even further by the appearance of 'Lakhta 2' and 'Lakhta 3'. One of these panoramas is presented in Fig. 9.



Fig. 9: Protected panorama of the all-round view from the colonnade of St. Isaac's Cathedral: northwest sector. The 'Lakhta Centre 1' skyscraper is clearly visible to the right of the centre.
Photo: Order of the Ministry of Culture of Russia dated October 30, 2020 No. 1295.

According to the Committee for the Preservation of Architectural and Historical Monuments (KGIOP),[12] the planned skyscrapers are located '*outside the boundaries of the historic settlement of the city of St Petersburg and outside the points (sectors) of the main visual axes of compositional and visual connections (panoramas, main visual directions along planning elements) that constitute the subject of protection of the historic settlement of federal significance, the city of St Petersburg*'. Indeed, Fig. 10 presents a diagram of the boundaries (sectors) of the main visual axes of compositional and visual connections, and panoramas, protected under the legislation on the historic settlement. The area of the proposed skyscraper construction has been neatly 'cut out' from this diagram.

2. Regarding compliance with urban planning restrictions and requirements:

2.1. Under the current General Plan of St Petersburg,[13] the area designated for the construction of skyscrapers is classified as Functional Zone D – a public and business zone.

2.2. In the current version of the St Petersburg Land Use and Development Regulations (PZZ)[14], the area designated for the planned construction of two skyscrapers is classified as a new type of territorial zone – zone TD4, the 'Public and Business Zone for Unique High-Rise Developments'. The **minimum** building height in this zone is 300 metres. It is believed that federal legislation does not permit the specification of minimum (rather than maximum) parameters for permitted construction in terms of height.[15]

2.3. On 18 March 2026, the draft of the PPT and its supporting materials were published on the website of the Committee for Urban Planning and Architecture of St Petersburg.[16] The PPT site falls almost entirely within the boundaries of territorial zone TD4.[17] However, the supporting materials completely deny the existence of any historical or cultural restrictions regarding the skyscraper construction site – neither under the WH Convention nor under national legislation. On 5 May 2026 the PPT was signed by the Governor of St. Petersburg (Decree No.275).

2.4. The next and final stage of preparation for construction will be the development of project documentation for the construction of two skyscrapers, its expert review, and the issuance of a building permit by the St Petersburg State Construction Supervision and Expertise Service.

Damage to the World Heritage site caused by the project

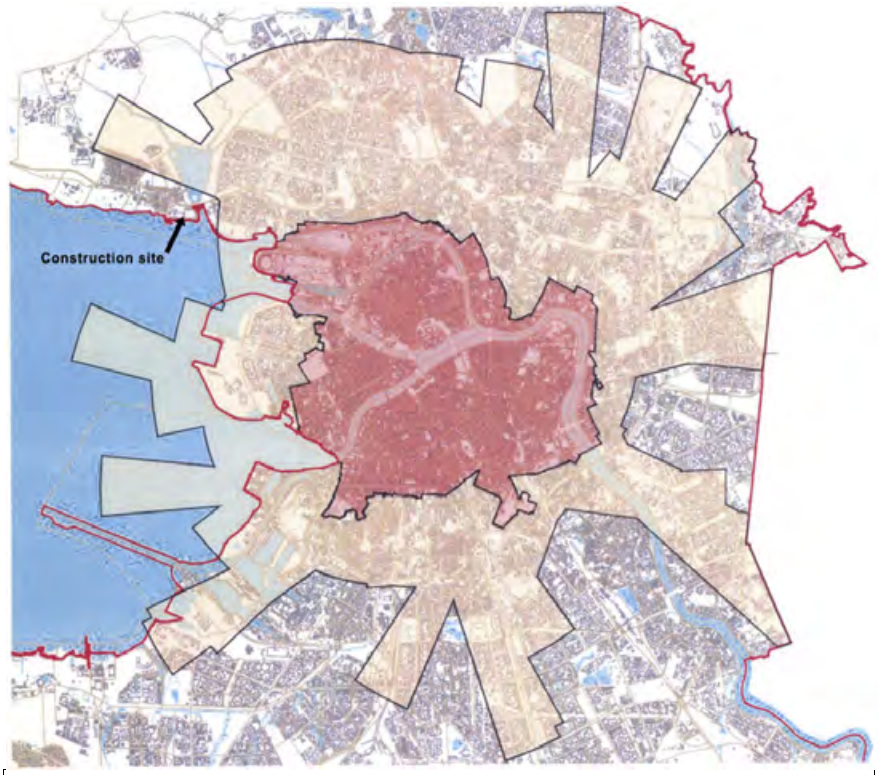
The failure to comply with the Convention when the building permit for the first skyscraper, 'Lakhta Centre', was issued on 17 August 2012 resulted in damage to the panoramas of St Petersburg's historic centre.

This damage was already noted by the UNESCO mission in 2019.[18] Even a single existing skyscraper intrudes quite aggressively into the protected panoramas of the Peter and Paul Fortress and the Spit of Vasilyevsky Island from the Palace Embankment and Kutuzov Embankment, into the panorama of the Neva from Troitsky Bridge and Voskresenskaya Embankment, the panorama of Petrovskaya and Petrogradskaya Embankments, and so on.

Based on photographs of the 462-metre 'Lakhta Centre' intruding into the city's panoramas, several visualizations have been created showing the detrimental impact of the new 555- and 703-metre skyscrapers on the city's historic appearance (Fig. 11). Landmarks such as St. Peter and Paul Cathedral and the Rostral Columns will lose their dominant position, whilst the historic centre will lose its horizontal silhouette.

A similar view was expressed in 2021 by experts from the Scientific Committee on Cultural Landscapes of the National Committee of ICOMOS (Russia)[19] and the Council of the St Petersburg Regional Branch of the National Committee of ICOMOS (Russia).[20] Unsurprisingly, no official assessments of the impact of the new skyscrapers on protected panoramas have been presented.[21]

THE BORDERS OF THE HISTORIC SETTLEMENT OF ST. PETERSBURG
AND THE BORDERS OF THE 'BASIN OF VISIBILITY' OF PROTECTED PANORAMAS



LEGEND:	
	Administrative borders of St. Petersburg
	The borders of the historic settlement of St. Petersburg
	The territory within the borders of the historic settlement of St. Petersburg
	The 'basin of visibility', i.e. the borders of the territory within which are located the points (sectors) of the main views of the compositional-view connections (panoramas, main visual directions along the planning elements) that constitute the Subject of Protection of the historic settlement of St. Petersburg
	Water bodies
	Buildings and constructions

Source: Order of the Ministry of Culture of Russia dated October 30, 2020 No. 1295 "On approval of the Subject of Protection, territorial boundaries, and requirements for urban planning regulations within the boundaries of the territory of the historic settlement of federal significance, the city of St. Petersburg" (as amended by Order of the Ministry of Culture of Russia dated September 3, 2024 No. 1687).

Fig. 10: The official borders of the 'basin of visibility' of protected panoramas of St. Petersburg: the construction site is 'cut out' from the protection zone. Boundary Map: Order of the Ministry of Culture of Russia

Opposition to the project

Opposition to the project takes the form of expert reports,[22] parliamentary opposition, legal challenges and participation in public consultations on urban planning documentation. Public opinion in St Petersburg, as in 2010, views the emergence of new skyscrapers with little enthusiasm.

The YABLOKO party faction in the Legislative Assembly of St Petersburg systematically advocates for the preservation of St Petersburg's 'skyline', for compliance with obligations arising from the WH Convention, and for the clarification and tightening of height restrictions on construction; it submits complaints and requests to state bodies. A number of urban conservation groups attempted to initiate a St Petersburg referendum on the question: 'Do you support a ban on the construction of buildings taller than 120 metres within St Petersburg (with the exception of engineering and religious structures)?'. On 21 November 2025, they submitted more than the minimum threshold of 300 signatures to the St Petersburg Electoral Commission to register an initiative group for holding a referendum, but received a formal refusal.[23]

What can be done?

To prevent the construction of two skyscrapers 555 and 703 metres high, the following measures must be taken by the Russian state authorities:

1. To approve the buffer zones for the World Heritage site as soon as possible;



Fig. 11: Visualization of the influence of the two new skyscrapers on the panorama of the Petrovskaya Emb. over the river Neva based on the photograph of the existing 462-metre skyscraper, 2026. Photo: t.me/sos_snos

2. To begin refusing to issue building permits in cases of non-compliance with the requirements of the WH Convention and the Operational Guidelines;
3. To amend the Subject of Protection of the Historic Settlement of St. Petersburg with regard to the 'view corridors' of urban panoramas, eliminating arbitrariness in the definition of the boundaries of the area where high-rise construction is restricted to protect the protected panoramas;
4. To amend the Protection Zones' Regimes so that protected panoramas are safeguarded from 'intrusions' not only within the boundaries of the protection zones but also within any possible field of view;
5. To reclassify the TD4 territorial zone as a standard business zone (TD1-2).

In order to ensure the preservation of the World Heritage property, it would be advisable for the competent bodies of UNESCO to call upon the Russian Federation to comply with the provisions of the WH Convention and its Operational Guidelines, and, in the event of continued failure to fulfill these obligations, to raise the issue of including St Petersburg on the List of World Heritage in Danger.

Notes

1 https://www.dp.ru/a/2024/03/09/beskonechnaja-istorija-kogda

2 https://www.dp.ru/a/2024/06/06/peterburzhcam-pokazali--kak; https://www.fontanka.ru/2024/06/05/73668026/, https://www.fontanka.ru/2024/06/07/73676078/

3 https://www.gov.spb.ru/press/governor/300464/ (accessible only from Russian or Belarusian IP addresses); https://nsp.ru/43562-prodolzaetsya-podgotovka-territorii-dlya-stroitelstva-eshhe-dvux- basen-v-laxte, https://www.dp.ru/a/2024/09/27/okolo-lahta-centra-postrojat

4 Territory Planning Project for the area bounded by Vysotnaya Str., Bobylskaya Street, Plyazhny Lane, Vodnaya Street, Beregovaya Street and Polevoy Lane in the Primorsky District of St. Petersburg (https://kgainfo.spb.ru/61364/)

5 https://bashne.net/?page_id=6785 (in Russian and in English)

6 Approved by Law of St. Petersburg No. 820-7 of 19 January 2009

7 The Historic Centre of St Petersburg and Related Groups of Monuments. Key Approaches to the Development of a Management Plan for the World Heritage site. Prepared by: D.S. Likhachev Russian Research Institute for Cultural and Natural Heritage. 2019. p. 36 (https://heritage-institute.ru/wp-content/uploads/2020/07/podhody-k-pu-ovn-spb-1-1.pdf)

8 Compare the two versions of protection zones of the building site: Law of St. Petersburg of 26 June 2014 No. 417-65 (before the construction plans) and Law of St. Petersburg of 29 July 2020 No. 369-89 (after the construction plans).

9 Territory Planning Project. Supporting Materials' Volume 2, Part 1, p. 26.

10 Letter from the Committee for State Control, Use and Protection of Historical and Cultural Monuments (KGIOP) dated 1 August 2024 No. 01-39-274/24-0-1

11 Order of the Ministry of Culture of Russia dated 30 October 2020 No. 1295 'On the approval of the Subject of Protection, the boundaries of the territory and requirements for urban planning regulations within the boundaries of the territory of the historical settlement of federal significance, the city of St Petersburg' (as amended by Order of the Ministry of Culture of Russia dated 3 September 2024 No. 1687)

12 Letter from the Committee for State Control, Use and Protection of Historical and Cultural Monuments (KGIOP) dated 1 August 2024 No. 01-39-274/24-0-1

13 Law of St Petersburg No. 781-169 of 21 December 2023

14 Resolution of the Government of St Petersburg No. 1008 of 19 December 2025

15 https://bashne.net/?page_id=6793 (in Russian and in English)

16 https://kgainfo.spb.ru/61364/. The period for submitting comments and proposals was from 2 to 13 April 2026; 'Territory Planning Project. Supporting Materials' Volume 2, Part 1, p. 53. The conclusion of public hearings with official comments to proposals was published on 20 April 2026 at: https://kgainfo.spb.ru/docs/2026/723_zakl.pdf.

17 Territory Planning Project. Supporting Materials' Volume 2, Part 1, p. 21

18 http://heritage-expert.ru/vsemirnoe-nasledie/217-ob-otchete-sovmestnoj-missii-tsentra-vsemirnogo-naslediya-ikomos-v-sankt-peterburg

19 https://www.heritage-expert.ru/kulturnye-lanshafty/kl-news/328-reshenie-nauchnogo- komiteta-po-kulturnym-landshaftam-po-neboskrebu-gazproma-lakhta-tsentr-2 (in Russian and in English)

20 http://heritage-expert.ru/vsemirnoe-nasledie/329-ikomos-spb; http://heritage- expert.ru/vsemirnoe-nasledie/329-ikomos-spb

21 In September 2025, whilst answering questions from the YABLOKO faction in the Legislative Assembly of St Petersburg, Deputy Governor Natalia Chechina stated that 3D modelling had been carried out during the drafting of the St Petersburg Land Use and Development Regulations, which provide for a public and business zone of unique high-rise buildings (TD4) with a minimum height of 300 metres. During this 3D modelling, the impact of these height parameters on St Petersburg's protected historical panoramas was allegedly assessed, and it was concluded that the creation of the 'Lakhta 2' and 'Lakhta 3' public and business centres posed no risk of compromising the preservation of the city's historical panoramas.However, as soon as the Yabloko faction requested the materials from this 3D modelling, the Vice-Governor of St Petersburg, Nikolai Linchenko, replied that the St Petersburg Government had not considered the impact of the skyscrapers planned for Lakhta on the city's panoramas at all; furthermore, the assessment of the height parameters of the entire zone of 'unique high-rise construction projects', carried out on a three-dimensional model, 'had not been documented', and consequently, these materials could not be provided (Letter from the Vice-Governor of St Petersburg, N.V. Linchenko dated 30 December 2025 No. 05-11-77/25-0-1)

22 Both the 'Lakhta Centre' project and the following 'Lakhta 2' and 'Lakhta 3' projects were ardently criticized by experts of the National Committee of ICOMOS (Russia). E.g. see the report of Sergey B. Gorbatenko of 2022: https://civvih.icomos.org/annual-meetings-scientific-symposiums/2022-brussels-belgium-annual-meeting-scientific-symposium-june-15-19/ (in English). A non-exhaustive list of publications against Gazprom skyscrapers and the distortion of the St.-Petersburg skyline (together with links) is presented here: http://heritage-expert.ru/vsemirnoe-nasledie/405-k-press-konferentsii-starogo-peterburga.

23 https://t.me/protectspb/622; Decision of 4 December 2025 No. 155-4 (https://vestnik.spbik.spb.ru//matrial/251204/155-4.pdf)

Süleymaniye, Istanbul: From Living Historic Quarter to Reconstructed Heritage Landscape

İbrahim Canbulat, M. Arch.

A World Heritage Concern within the Historic Areas of Istanbul

The Historic Areas of Istanbul were inscribed on the UNESCO World Heritage List in 1985 under criteria (i), (ii), (iii), and (iv), recognising their exceptional testimony to the interaction of Byzantine and Ottoman civilizations and their outstanding urban, architectural, and cultural significance. Within this serial World Heritage property, Süleymaniye occupies a particularly important place. While globally identified through Sinan's Süleymaniye Mosque and its monumental *külliye*[1], the site's significance has never rested on the monument alone. Its Outstanding Universal Value also derives from the surrounding historic urban fabric: the timber residential quarters, narrow streets, topographical relationships, and the social organization of the Ottoman *mahalle* structured around the *külliye*.

This report raises a concern that the principal threat to Süleymaniye may no longer be simple neglect or physical decay, but the gradual replacement of a living historic urban quarter by a reconstructed and curated heritage environment whose authenticity and integrity are increasingly uncertain.

Historical context: A living urban quarter, not a monumental isolate

Süleymaniye should not be understood merely as the setting of a monumental mosque complex. It was historically a lived urban organism. The area developed as one of Istanbul's distinguished residential quarters, shaped first by Byzantine urban continuity and later transformed into a major Ottoman neighbourhood structured around religious, educational, charitable, and domestic life. The *külliye* functioned not only as an architectural masterpiece, but as the nucleus of a complex social ecology.

The district's significance is therefore not limited to criterion (i), which recognizes the Süleymaniye Mosque as a masterpiece of human creative genius, but also to criteria (ii), (iii), and (iv), which depend upon the urban layering, social continuity, and ensemble character of the wider historic quarter. The present concern relates particularly to these attributes, where the living urban district matters as much as the monument itself.

Any serious assessment must avoid romantic simplification. Süleymaniye's decline did not begin with recent renewal projects. Long before formal intervention regimes, the district had already undergone profound socio-economic transformation. As Istanbul's social geography shifted during the twentieth century, upper- and middle-class residential populations gradually moved elsewhere. Traditional houses increasingly became workshops, warehouses, temporary accommodation, and low-income rental units. Residential continuity weakened and physical deterioration accelerated.

This historical decline should be acknowledged honestly. Yet deterioration alone does not justify replacing historic complexity with an artificially coherent historical image.

A multi-phase transformation regime

The present condition of Süleymaniye cannot be explained as the result of one isolated intervention. Rather, the evidence suggests a multi-phase transformation regime extending over nearly two decades.

The first major rupture was social. Reports from the late 2000s documented forced eviction concerns, fragmented ownership, tenant displacement, fires, demolitions, and progressive property consolidation. What began to disappear first was not simply the building stock, but living neighbourhood continuity itself. Historic urban districts do not lose authenticity only when buildings collapse; they also lose authenticity when their social ecology is dismantled.

A second phase followed in which Süleymaniye increasingly ceased to be treated as a fragile historic quarter requiring careful conservation and instead became a redevelopment field. The logic shifted from incremental urban conservation toward block-scale intervention, coordinated restructuring, and reconstruction-oriented planning. This represented a fundamental conceptual shift. A historic neighbourhood is not equivalent to a master-planned urban design problem.

1 A *külliye* is a complex of buildings associated with Turkish architecture centered on a mosque and managed within a single institution, often based on a *waqf* (charitable foundation) and composed of a *madrasa* (quran school), a Dar al-Shifa (clinic), kitchens, bakery, *hammam* (public bath), other buildings for various charitable services for the community and further annexes. (Wikipedia)

A third phase is visible in the physical fragmentation of the district today. Vacant parcels, discontinuous streetscapes, altered land use, parking lots replacing historic continuity, and inconsistent building interventions raise serious integrity concerns. In UNESCO terms, integrity concerns wholeness and intactness. The unavoidable question is whether a district with substantial discontinuities in its urban grain, social structure, and material continuity can still fully sustain the values under which it contributes to World Heritage status.



Fig. 1: Northern slope of the Süleymaniye World Heritage Area, near Kalenderhane Mosque, Fatih, Istanbul (41.015878 N, 28.961255 E). Construction waste and parking encroach upon the historic urban fabric, with the former Byzantine church of Kalenderhane visible in the background Photo: İbrahim Canbulat

More recent interventions present themselves in markedly different language. Public space improvement, pedestrianization, cultural routes, community-oriented reactivation, and the "living heritage" discourse suggest a welcome shift in tone. Yet they also raise a difficult question: when a district's social continuity has already been deeply weakened and its historic urban fabric heavily fragmented, what exactly is being repaired — a living district, or the image of one?

Authenticity and integrity

Authenticity is perhaps the most serious issue. Under UNESCO doctrine, authenticity is not limited to visual resemblance. It encompasses material authenticity, design, urban morphology, spatial relationships, use and function, and the more elusive qualities of spirit and feeling. This broader understanding makes Süleymaniye especially sensitive.

A reconstructed timber-looking streetscape may visually resemble a historic quarter while failing more demanding authenticity tests. The real questions are whether interventions remain materially truthful, whether reconstructed forms genuinely reflect documented historic conditions, whether parcel logic and urban grain are preserved, and whether historic social functions remain meaningfully sustained. A visually convincing environment is not necessarily an authentic one.

Integrity raises parallel concerns. Süleymaniye's significance lies not in isolated monuments, but in the relationship between monument and domestic architecture, slope and street, timber house and stone institution, built form and urban void, and above all between spatial structure and social life. Once these relationships are substantially weakened or replaced by curated historical compositions, World Heritage concerns move beyond architecture into the core question of whether the ensemble itself remains intact.

Social authenticity: The missing dimension

Perhaps the most overlooked issue is social authenticity. Historic districts are not museum objects; they are lived systems. The Ottoman *mahalle* was not defined solely by façades or rooflines, but by neighbourly relations, domestic life, mixed everyday uses, and informal urban rhythms.

This does not mean that historic communities must remain socially frozen. That would be impossible. But it does mean that conservation cannot be reduced to physical appearance alone. If restoration proceeds alongside displacement, tourism-oriented replacement, or functional sterilization, authenticity is weakened even where architecture appears restored. This is particularly relevant to UNESCO's contemporary understanding of living heritage and the Historic Urban Landscape approach.

The core heritage question

Süleymaniye's present condition forces a necessary distinction: Are we conserving a historic urban quarter, or constructing a carefully managed image of one? This is not rhetorical. Conservation accepts complexity, layered change, partial loss, and imperfect continuity. Simulation seeks coherence, visual legibility, and historical impression. World Heritage protection should safeguard the former, not inadvertently reward the latter.

Recommendations

This report does not argue that Süleymaniye has lost all World Heritage value, nor does it advocate delisting. The Süleymaniye

Mosque and külliye remain unquestionably significant, and substantial heritage values survive. Precisely for that reason, closer scrutiny is warranted.

UNESCO and the World Heritage Centre may wish to consider a focused review of Süleymaniye's current condition within the Historic Areas of Istanbul, including the cumulative effects of reconstruction practices, functional transformation, social displacement, and physical fragmentation. A Reactive Monitoring review would help clarify whether the attributes supporting criteria (iii) and (iv) remain adequately protected, and whether further international attention may be necessary.

Final reflection

Süleymaniye's greatest danger may no longer be abandonment. Abandoned districts can still be honestly conserved. The greater danger is the gradual replacement of a complex, layered, living urban quarter with a carefully curated historical image that appears authentic while severing the relationships that once gave the place meaning. Süleymaniye is not merely a monument. It is — or was — a living historic urban world. The question now is whether that world is still being conserved.

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Safranbolu: Gradual Transformation and the Limits of Governance

İbrahim Canbulat, M. Arch.

This report does not introduce a newly emerging issue, but rather aims to highlight a set of challenges that have been repeatedly identified over the past decade, yet remain insufficiently addressed. Recent developments suggest that these long-standing issues may now be entering a more critical phase, with potential implications for the integrity of the property. The intention of this submission is not to assign responsibility, but to support ongoing monitoring and evaluation processes by providing additional documentation and observations. I would be grateful if the report could be taken into consideration within the relevant monitoring and assessment mechanisms.

Safranbolu, inscribed on the UNESCO World Heritage List in 1994, is widely regarded as one of the best-preserved Ottoman towns. Its historic districts — Çukur, Kıranköy, and Bağlar — have long been celebrated for their architectural integrity and continuity of urban form. Yet this image of preservation conceals a more complex and less visible reality. What is unfolding in Safranbolu is not a sudden threat, nor a clearly identifiable act of destruction. It is a gradual, cumulative process — one that has been observed, documented, and repeatedly noted over more than a decade, but has remained largely unaddressed.

Since the early 2010s, monitoring reports and independent assessments have consistently pointed to key structural issues: The absence of an effectively functioning buffer zone, weaknesses in management implementation, and fragmentation in governance. These concerns are not new. What is new is their cumulative effect. Safranbolu today represents a case where long-recognized challenges are no longer theoretical — they are becoming material.

From living town to representational heritage

The current transformation of Safranbolu must be understood in its historical context. The establishment of the Karabük Iron



Fig. 1: Example of incremental and unregulated transformation within the historic fabric of Safranbolu. Traditional construction systems coexist with incompatible modern interventions, illustrating the gradual loss of architectural integrity. Photo: İbrahim Canbulat

and Steel Plant in 1937 triggered a major shift: economic activity moved away from Safranbolu, traditional production systems declined, and demographic patterns changed. The town's historic fabric survived not because of active conservation, but because of economic displacement. This created a form of passive preservation. However, this condition did not remain static. With the rise of tourism, Safranbolu entered a new phase — one driven not by production, but by consumption.

Traditional houses have been converted into boutique hotels and pensions. Crafts have shifted from functional production to souvenir-oriented activity. Residential life has gradually retreated from the historic core. What remains is a preserved environment increasingly shaped by external demand. In the Çarşı district, buildings still stand, but the continuity of life that once sustained them has weakened. What emerges is a condition that may be described as preservation of form without continuity of function.

Cultural landscape under pressure

The transformation is even more visible in Bağlar. Historically a seasonal settlement connected to agricultural life, Bağlar formed an integral part of Safranbolu's cultural landscape. Today, this landscape is fragmenting. Parcels are subdivided. Agricultural use is disappearing. Traditional seasonal patterns are being replaced by private villas and individual developments. The spatial coherence of the area is weakening. This is not simply a local change. It reflects a broader difficulty in recognizing and protecting cultural landscapes as dynamic and functional systems.

Tourism, pressure, and fragmentation

Tourism now defines Safranbolu's urban dynamics. Visitor numbers—particularly day-trippers—have increased significantly, concentrating movement along limited routes and intensifying pressure on specific areas. Infrastructure struggles to adapt. Parking solutions remain inadequate. Visual and functional integrity are gradually affected. Accessibility, in this context, is not a sign of successful management. It is a sign of increasing pressure.

Governance: The core issue

At the center of this transformation lies governance. Safranbolu faces overlapping authorities, limited coordination between planning and conservation, and insufficient local capacity. Perhaps most critically, the property still lacks a formally defined and effectively implemented buffer zone.

Recent planning decisions have further complicated the situation. Protection statuses in surrounding areas have been downgraded, planning processes have shifted toward centralized control, and new development pressures have emerged near protected zones.

A legal challenge initially confirmed these risks. However, the decision was later overturned on procedural grounds, leaving the underlying issues unresolved. This is not a failure of recognition, it is a failure of implementation.

Beyond Safranbolu: A broader pattern

Safranbolu is not an isolated case. Similar dynamics have been observed in other historic urban areas in Türkiye, including Sulukule, Süleymaniye, and Şanlıurfa. In these cases, conservation frameworks have struggled to manage development pressures and urban transformation processes.

A particularly important dimension is the evolving role of urban renewal. What has been presented as "renewal" has increasingly shifted from conservation-oriented rehabilitation toward large-scale interventions that reshape historic environments. These processes often introduce new building patterns, alter parcel structures, and accelerate displacement. In this sense, renewal no longer functions as a tool of conservation, but as a mechanism of transformation. Safranbolu, although following a different trajectory, now shows early signs of similar pressures.

A structural blind spot

The case of Safranbolu also reveals a broader limitation within the World Heritage system. The system is highly responsive to sudden destruction — conflict, disaster, or visible damage. However, it is less effective in addressing gradual transformations: incremental loss of authenticity, social displacement, and commodification. These processes rarely trigger immediate alarm. Yet over time, they may lead to equally significant loss. Safranbolu exemplifies this condition — a site where change is slow, cumulative, and therefore difficult to confront.

Conclusion

Safranbolu remains a place of exceptional value, but this value should not be understood as fixed or guaranteed. What is at stake is not the immediate destruction of the site, but its gradual transformation into something fundamentally different. The challenge therefore is not only to protect what exists, but to recognize how change unfolds — and to act before it becomes irreversible.

III. Cultural Landscapes and Mixed Properties

Victory for Civil Society: Court Order Stops the Zip Line on Rio de Janeiro's Sugar Loaf Mountain

José Pedro de Oliveira Costa and Maritta Koch-Weser, World Heritage Watch



Fig. 1: "A paradise must not become a private development"; "Tirolea No!" Photo: Carlo de Souza / AFP via Getty images

The infamous project to build four zip lines damaging Rio de Janeiro's iconic Sugar Loaf Mountain – Pão de Açúcar (the "Tirolesa Project"), has been strongly contested since 2023. We are happy to report that it has been stopped by Court Order on March 31, 2026[1].

Further construction of the "Tirolesa" Building and four Zip lines from the Pão de Açúcar (Sugar Loaf) to the nearby Urca Mountain, which is said to be 95% completed[2], has been interdicted, obliging the demolition of the construction, and repairs to the granite of Pão de Açúcar. In addition, a hefty fine of 30 Million Reais (approx. 4.5m Euros) must be paid by the initiators of this illegal construction, the developer Sugarloaf Aerial Tramway Company (CCAPA), and the National Institute of Historic and Artistic Heritage (IPHAN) which approved the project. The compensation will be allocated to the Fund for the Defense of Diffuse Rights. Since 2023 ICOMOS had protested against the Pão de Açúcar Zip line project[3]. Nevertheless, construction work was initiated in the absence of due permits, while legal struggles continued all along.

In the ruling, Federal Judge Paulo André Espirito Santo Manfredini ordered CCAPA to present, within 60 days, a plan for the recovery of the degraded area, including the removal of temporary structures and debris. A deadline of 120 days was also set for the presentation of a Master Management Plan for the granted area, prohibiting any expansion of the built area or alteration of the uses recognized by the federal listing and the UNESCO World Heritage title. The developer is expected to appeal the decision.

The court order to preserve Pão de Açúcar, which is so emblematic for the Rio de Janeiro Cultural Landscape, has been welcomed across the country and most prominently by Carlos Minc, Rio de Janeiro's leading environmentalist and Brazil's former Environment Minister.

The plans for the zipline – see WHW Report 2024[4] - has been fiercely opposed by local activist groups, NGOs and environmentalists[5]. As World Heritage Watch we join the applause for this success to which we have contributed with a letter sent to Brazil's President Inácio Lula on March 4, 2024, and which at the time was duly acknowledged by the President's office.

Notes

1 https://www.trf2.jus.br/jfrj/noticia/2026/justica-federal-do-rj-impede-construcao-de-tirolesa-no-pao-de-acucar-determina

2 https://www.independent.co.uk/travel/news-and-advice/brazil-sugar-loaf-mountain-zipline-blocked-b2952800.html

3 https://www.icomos.org.br/single-post/nota-sobre-as-interven%C3%A7%C3%B5es-em-curso-nos-morros-do-p%C3%A3o-de-a%C3%A7%C3%BAcar-e-urca-no-rio-de-janeiro

4 https://world-heritage-watch.org/content/wp-content/uploads/2024/06/WHW-Report-2024-final.pdf pp. 94-98

5 https://news.mongabay.com/2023/04/new-zipline-on-rios-sugarloaf-raises-outcry-from-conservationists/

A US Takeover of Greenland Would Put a World Heritage Site at Risk

By Niels Henrik Hooge, Friends of the Earth Denmark



Fig. 1: Kujataa Greenland: Norse and Inuit Farming at the Edge of the Ice Cap
Photo: Greenland National Museum & Archives, Christian K. Madsen

Although one of the big mining projects near the Kujataa UNESCO World Heritage Site (WHS) in South Greenland has been blocked, the threats to the WHS have not subsided. The property,[1] which is one of Greenland's three world heritage sites, was inscribed on UNESCO's world heritage list in 2017. It comprises a sub-arctic farming landscape consisting of five separate components that represent key elements of the Norse Greenlandic and modern Inuit farming cultures, constituting the earliest introduction of farming to the Arctic.

The problem is not only the proximity of the large-scale mining projects to the Kujataa WHS, but suspicions that the license-holders might not comply with Greenlandic law, based on their previous behaviour. This could pose a threat to Kujataa's Outstanding Universal Value (OUV) from specifically these projects as well as from the cumulative impact of all the mining projects in the region.

Major mining projects are located near the WHS

Some of the biggest mining projects in the world are situated near the WHS. The biggest and most controversial is the Kvanefjeld (Greenlandic: Kuannersuit) uranium and rare earth

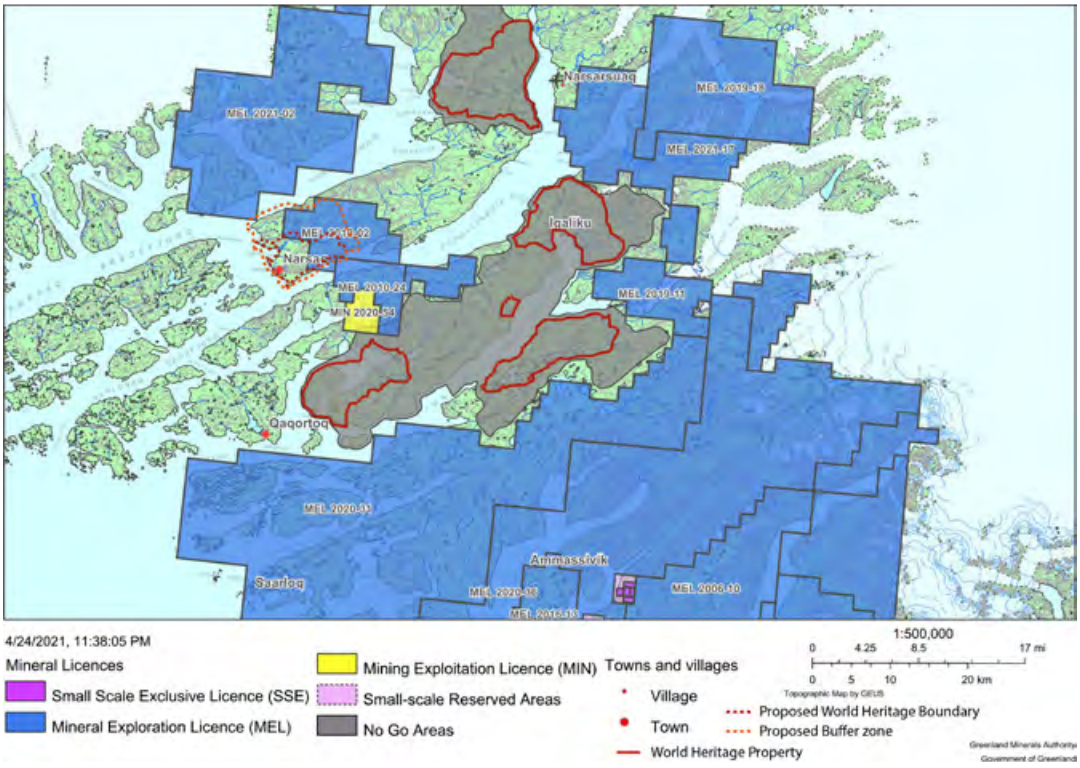


Fig. 2: Mineral licenses in Kommune Kujalleq. MIN 2020-54 (yellow area) marks the Kringlerne exploitation license area, MEL 2010-02 (blue area) the Kvanefjeld exploration license area. The grey areas represent the Kujataa UNESCO WHS and buffer zones
Map: Greenland Minerals Authority, April 2021 / Sumin Bajracharya

elements (REEs) mining project, owned by the Australian company *Energy Transition Minerals*, ETM. According to ETM, in addition to containing the second biggest uranium[2] and by far the largest thorium deposits, Kvanefjeld possesses the third largest deposit of REEs in the world.[3] The mine, which would also be the world's second largest open pit uranium mine, is located on top of a mountain, almost one kilometre above sea-level, only six kilometres away from Narsaq, a town of approximately 1,500 inhabitants, and near some of the parts of the Kujataa WHS.

A second major project close to Kujataa is the Kringlerne (Greenlandic: Killavaat Alannguat) REEs mining project, which is known to possess the largest deposit of REEs in the world.4 The minerals are supposed to be extracted from two open pits at high altitude. In 2020, the Australian company T*anbreez Mining Greenland A/S* secured a 30-year exploitation license for the project.[5] A third significant project is the Motzfeldt REE mining project, which is part of the Motzfeldt Centre and owned by *Elemental Rare Earths Ltd*.[6]

For more than a decade, ETM has undermined the rule of law

The problems caused by ETM could have been predicted many years ago, when the ban on uranium mining in Greenland was lifted on the request of the mining company itself. ETM declared that it wanted to mine not only REEs, but also uranium, and if it did not get permission, it would abandon the project.

In 2013, when the ban then was abolished, Greenlandic and Danish environmental organizations and government opposition politicians pointed out that the ownership group behind ETM (then named Greenland Minerals and Energy Ltd., GMEL) had connections to organized crime in Australia and financed terrorist activity in the Horn of Africa. The warnings resulted in inquiries in the Danish Parliament's Foreign Policy Committee[7] as well as in the Greenlandic Parliament, Inatsisartut[8], with a view to having the mining company investigated by the authorities. In both countries, the ministers in charge refused to do anything about the problem.

The result was that the boundaries between the mining sector's public and private sector became less evident. Over the next several years, ETM undermined the regulatory process on numerous occasions and was reprimanded in 2019 by Greenland's then Prime Minister and the Permanent Secretary of the Department of Nature and Environment for improperly trying to influence ministers and senior officials.[9] Furthermore, ETM established ties to parts of the political community and the civil service, which was considered inappropriate by most of the Greenlandic public. In addition to hiring Greenland's former Prime Minister as Chairman of its board.[10] ETM also hired two former Deputy Ministers for Mineral Resources, one as Chairman of the Board, the other as Executive General Manager.[11]

Although the mining company denied involvement, during the so-called "uranium general election" in 2021, ETM was linked to an anonymous smear campaign targeting the future Prime Minister Múte B. Egede of Inuit Ataqatigiit, which could have cost his party the election.[12]

After Inuit Ataqatigiit's reintroduction of the uranium ban, ETM sued the Greenlandic and Danish governments for €10 billion, equivalent to almost four times Greenland's annual GDP. The Danish government's legal adviser, who conducted the case on behalf of both governments, rejected the lawsuit as without merit and stated that the initiation of the arbitration case has "no other purpose than to try to put undue pressure on the Greenlandic government in order to grant ETM an exploitation permit for the Kvanefjeld project, to which the company has no legal claim under Greenlandic law."[13] The consensus in the legal community is that the company is on its way to losing the case. The lawsuit against the Danish government has already been rejected.

Contributing to the Trump administration's interest in annexing Greenland

More seriously, ETM has been linked to the American offer to buy Greenland[14]. This also applies to the Australian owner of Tanbreez, who has made no secret of the fact that without him, there would have been less interest from the Trump administration in acquiring Greenland.[15]

U.S. control of Greenland would pose a threat to the Kujataa WHS's OUV, because it in all probability would mean a roll-back of Greenland's environmental legislation. Under the current administration, the U.S. is withdrawing from UNESCO, which will take effect on December 31, 2026.[16] Furthermore, it has removed more than 400 environmental safeguards through deregulation, including opening up the Arctic National Wildlife Refuge and the Tongass National Forest, for drilling and logging.

Thus, Greenland's more than hundred active mining license areas in various stages of development constitute not only an environmental, but also a security problem. Together, they cover a fifth of habitable areas and instead of occupying the country by military means, investors affiliated with the Trump administration could buy Greenland piece by piece. This threat[17] has not escaped the Greenlandic government, and Greenland's minister for business and mineral resources, Naaja Nathanielsen, recently declared that Greenland" is not necessarily interested in becoming a really great mining country" and that "we just really want 5 or 10 active mines at any given time."[18]

The way forward

Realising that it is a problem that dubious mining companies are active in Greenland,[19] the government has adopted a new investment screening law, which provides the opportunity to investigate and, if necessary, prevent company activities threatening Greenland's security.[20] For this purpose, the Government can obtain and exchange information with the Danish security authorities.

The first test, which is just around the corner, is the take-over of Tanbreez by the Australian-American mining company Critical Metals Corp. Together with five other environmental organizations, NOAH complained to Nasdaq in 2024, documenting that the company has misled the public, the authorities, and current and possibly future shareholders in at least twelve cases, which under Greenlandic law should prohibit Critical Metals Corp from operating in Greenland, at least in the foreseeable future[21]. A decision on whether the company should be allowed to own the exploitation license for the Kringlerne mining project is expected by the end of March 2026.[22]

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Germany Continues to Ignore UNESCO in the Upper Middle Rhine Valley

Elke Greiff-Gossen and Klaus Thomas, BI Rheinpassagen

The high ranking of the Middle Rhine cultural landscape, undisputed in the world, is based on its extraordinary density and unique diversity of outstanding natural and cultural monuments as tangible evidence of geological and cultural history, and on the interaction between culture and nature.

The river itself, its course and the scenery dominated by vineyards and dotted with ancient castles and historic places, have all played a part in forming this unique landscape, which led to the national and international "Rhine romanticism" of the 19th century and even today still determines – consciously or subconsciously – our emotional attachment to it as a special national homeland.

For this reason, the Middle Rhine valley has become an extraordinary, continuing and associative cultural landscape (according to the UNESCO concept), which plays a unique and characteristic part in conferring a feeling of identity-to the native population as well as the global community. [1]

However, this world heritage is **endangered by**

1. the planned construction of the **Middle Rhine bridge**,
2. the constant strain and danger caused by **rail traffic** and
3. the planned national **gardening show 2029** in the Middle Rhine valley.

Threat 1: Middle Rhine bridge - 47 COM 7B.109 point 4

At present, the Rhine can be crossed by ferry at five points. The state of Rhineland-Palatinate wishes to improve the infrastructure in the Upper Middle Rhine Valley World Heritage Site. As part of the regional planning process, six options were examined: a total of three bridges, one tunnel and two ferry options:

1. A bridge between the town centres of St. Goar and St. Goarshausen ("low-level central")
2. A bridge downstream between Fellen and Wellmich ("low-level outside")
3. A particularly high bridge on the outskirts of St. Goar ("high-level central")
4. A tunnel
5. Free ferry
6. Free ferries around the clock.

The newly elected state government (CDU/SPD) of Rhineland-Palatinate supports the construction of the Middle Rhine Bridge. The focus is currently on the next planning stages, responsibilities and funding. [2]



Fig.1: It is a fake fact that a Middle Rhine bridge is the only feasible crossing option to be pursued in terms of World Heritage compatibility. Photo / Graphics: Elke Greiff-Gossen

The regional planning decision regarding the Middle Rhine crossing between St. Goar and St. Goarshausen concludes as follows:

> "The 'Low-level outside' proposal variant, submitted for regional planning coordination by application dated 2 February 2021, is to be regarded as compatible with regional planning requirements, subject to the conditions and notes set out below. The 'Lowlevel outside' variant is also designated as a regional planning guideline in conjunction with Z 128 and Z 189 of the RROP, as it is the only feasible crossing option to be pursued in terms of World Heritage compatibility from the perspective of those responsible for World Heritage protection at state and federal level." [3]

The Middle Rhine bridge offers no solution for local needs. The opposite is the case.

With the construction of the Middle Rhine bridge, the initiators are prepared to accept that 4 ferries will have to cease operations for economic reasons. The ferry operators have already notified the State Government accordingly.

The consequence would be that motorists would have to drive long detours to reach the opposite side of the Rhine. According to the VCD German Traffic Club, this would add up to 9.1



Fig. 2: A bridge for supra-regional traffic is no solution for local needs.
Map source: Willy Spannowski / Landesrechnungshof Rheinland-Pfalz. [4][5]

million km by passenger car per year. This equals 200 circumnavigations of the earth. Pedestrians and cyclists are unable to handle such distances. A bus service would have to be provided for these groups. According to VCD, this would add up to an additional traffic of 0.2 million km by bus per year. This equals 4 circumnavigations of the earth. [6]



Fig. 3: Site of the planned Middle Rhine Bridge in front of Maus Castle and St Martin's Parish Church.
Photo: Elke Greiff-Gossen

The Middle Rhine Bridge will spoil the view of Maus Castle and St Martin's Parish Church. These are part of the nomination of properties for inscription on UNESCO's World Heritage List 2002. [7]

We propose an optimized, demand-oriented ferry transport system. Ferries should run free of charge to achieve the structural improvement required by the State Government. Moreover, the operating hours should be extended so that ferries run for 18 hours at three locations, and for 24 hours at one location.

Through the proposed optimisation of ferry traffic, both sides of the Rhine would be closely interconnected, no longer separated. This connection would be climate-friendly, quiet and future-proof. The distinctive features of the world heritage area



Fig. 4: Ferries are a solution for local needs. There are five ferries in the World Heritage Upper Middle Rhine Valley but they would all be pushed out of business.
Photo and Graphic. Elke Greiff-Gossen



Fig. 5: Dangerous goods are transported right through the centers of historic small cities along the Rhine river. Photo: Elke Greiff-Gossen



Fig. 6: The construction of noise barriers cut through entire villages, such as here in Kamp-Bornhofen. Photo: Klaus Thomas

would be preserved – an intact natural and cultural landscape and ferries as a cultural asset.

The unique cultural landscape of the Rhine valley must be preserved. So we need a clear **"no" to the Middle Rhine bridge** from UNESCO.

Threat 2: Rail traffic - 47 COM 7B.109 point 10

The world heritage is endangered by rail traffic noise, vibrations and dangerous goods.

Since being designated a World Heritage Site in 2002, freight traffic in the Middle Rhine Valley has increased dramatically, even though UNESCO had already urged at the time that noise pollution be reduced. Back then, 300 to 350 trains thundered through the valley; today, there are 600 to 800 trains a day.

This increase is primarily due to the significant expansion of freight traffic on the Rotterdam–Genoa route. The Upper Middle Rhine Valley World Heritage Site has become one of the busiest freight transport corridors in Europe.

Due to the topography of the Rhine valley, the sound waves are reflected by the mountain slopes and water surface. This is known as the tunnel effect. The sound roars just like inside a tunnel.

People are leaving the valley because of the exposure to enormous noise and damage to their health. They are constantly exposed to a high health risk. Noise and vibrations cause the real estate prices to fall by up to 50%. Tourists stay in the valley only for a short time. [8]

We want a quiet Middle Rhine valley, a place where both residents and tourists feel comfortable. We want to preserve the scenery and prevent disasters such as landslides on slopes, water damage to rail tracks and accidents involving dangerous goods.



Fig. 7: The remodelled roof of the Loreley Open Air Theatre is visible from great distance. Photo: Elke Greiff-Gossen

We propose speed limits as an immediate measure, the only effective way to reduce the noise level. Noisy freight trains should not run at all during the night. Dangerous goods must be completely banned from the valley. In the long run, freight transport must be re-routed away from the narrow Rhine rift valley all together by building a modern railway line for freight transport elsewhere. There is an urgent need for the new railway route to be included in the Federal Transport Plan for new projects.

The consequence would be that the economic basis for preserving the world heritage would be established. Thanks to the better residential quality, more people would move into the valley. Tourists would be able to sleep well and thus stay longer in the valley. The scenery and consequently the main attraction of this valley would be preserved.

The quality of life and the intact natural landscape must be preserved.

Threat 3: Loreley Plateau - 47 COM 7B.109 point 6

The world heritage is endangered by the planned federal gardening show BUGA 2029. Completed projects such as the remodelling of the Loreley open-air theatre, the remodelling of the Loreley plateau and the "Crystal" give rise to such fears. The remodelling of the Loreley open-air theatre has destroyed the visual integrity in the heart of the world heritage area.

The Crystal adds to, and reinforces this impression, it is also visible from a distance in the valley. It was intended to be so.

Plans for the Loreley hotel have been put on hold. In 2021, the investor and owner of the hotel site, located in the immediate vicinity of the world-famous rock, withdrew his initial planning application. This came as a great surprise at the time. He had originally planned a 700-room hotel and 15 two- to four-storey "hotel villas". But he is still owner of this site.



Fig. 8: The glass roof of the "Myth Hall" on the Loreley (the "Crystal"), shaped like a stylized glass rock. Photo: Klaus Thomas

On the Loreley plateau, there is no adequate infrastructure – water supply, sewage connections an parking ground – for building a new hotel.

If this project is pursued any further, this will lead to more destruction of natural landscape and visual integrity.

We want no more sealing of land. Sustainability should be the decisive criterion. Development measures and projects must be examined concerning their inner logic and outward orientation on the central values of the landscape, and be subject to such values. Sustainable development concepts must be a mandatory prerequisite for the use of land. The landscape must be developed according to its natural character.

We propose to make the bottom of the valley more attractive, more investments should be made there. Development of existing buildings, temporary accommodation facilities, such as hotel boats, should be used during the BUGA to prevent vacancies after the BUGA. No new buildings in prominent locations such as the "Loreley". Building projects should be visualised to recognize ahead of time whether or not they would destroy scenery.

The result would be preservation of the unique character of the natural and cultural landscape. The attractiveness of the cultural landscape would be secured. The region would be fit for the future. The distinctive features would be preserved. If we want to avert the BUGA threat, this means "demanding deconstruction, refusing to accept a fait accompli" for example of the open-air theatre roof.

Clear statements are necessary for **no more sealing of land.**

The Upper Middle Rhine valley world heritage must be preserved!

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The Rammelsberg Mine, Old Town of Goslar, and the Upper Harz Water Management System

Henning Frase, Initiative Group for the Preservation and Support of the Old Town of Goslar



Fig. 1: A damaged and partly overgrown retaining wall at the Rammelsberg Mine. Photo: Henning Frase

The World Heritage property of "Rammelsberg Mine, Old Town of Goslar, and Upper Harz Water Management System" possesses outstanding universal value as a mining landscape that has evolved over centuries. Goslar became a rich town and a seat of the Germany Emperor through the silver mines of the nearby Rammelsberg, while the water needed for the mine was diverted from the Harz mountains through an extensive sophisticated system of artificial lakes, ditches and weirs, resulting in a culturally significant ensemble of landscapes of technical and historical importance. Deficiencies in individual components therefore affect not only individual elements but also the integrity of the site as a functionally and historically coherent World Heritage as a whole.

In all three components — the Rammelsberg Mine, the Old Town of Goslar, and the Upper Harz Water Management System — structural threats have emerged that reinforce one another: a long-standing backlog of renovations, limited financial and human resources, deficiencies in management and coordination, increasing climate-related pressures, and growing conflicts over land use. This situation can no longer be regarded as a mere maintenance backlog, but rather as a systemic threat to the site's outstanding universal value.

The key role of the "UNESCO World Heritage in the Harz" Foundation

In 2025, the impending insolvency of the "UNESCO World Heritage in the Harz" Foundation was temporarily averted through additional grants from its sponsoring organizations and a strict austerity budget. However, the existential financial crisis that has thus come to light points to fundamental shortcomings in the foundation's governance, financing, and strategic management. This impairs its ability to fully carry out its core responsibilities for the World Heritage property, including the coordination and updating of an integrated management plan for the entire World Heritage complex.

Goslar's mismanaged Old Town

Many of the approximately 4,000 buildings in the Old Town have been in significant need of renovation for years. Rising construction, energy, and operating costs, the growing backlog of renovations, and the pressure to adapt to energy efficiency requirements hinder sustainable use, and lead to a gradual loss of attractiveness and physical integrity.



Fig. 2: A view of a building facade on Jakobistraße, serving as a prime example of the many technically outdated buildings in Goslar's Old Town that are in need of renovation. Note also the inappropriate tarmac cover of the boardwalk. Photo: Henning Frase

A lack of political will, insufficient awareness of historic preservation, and understaffing in the relevant agencies further exacerbate this negative trend, placing the integrity and authenticity of the historic urban fabric under increasing pressure. Furthermore, inadequate management of archival holdings jeopardizes the site's outstanding universal value: the loss or endangerment of key sources impairs the reliable documentation and communi-

cation of the historical continuity and significance of the World Heritage site. The renovation and preservation costs required for this are estimated to be in the range of 200 to 300 million euros.

Roads

Due to decades of underinvestment and misplaced priorities, Goslar's roads are in poor condition. The estimated cost of repairs is approximately 600 million euros. After accounting for planned measures, the city's 2024/2025 budget allocated about 2.1 million euros annually; a similar level is expected for 2026. The Civil Engineering Department, however, considers 10 to 20 million euros per year necessary to achieve noticeable improvements. Under current conditions, a complete renovation would theoretically take 200 to 300 years. Staff shortages, high planning costs, limited construction capacity, ongoing heavy truck traffic, and aging utility lines are exacerbating the situation.



Fig. 3: Road damage in front of the building at Bäckerstraße 3 in Goslar, serving as a prime example of the many road and sidewalk surfaces in the old town that are in need of repair and, in some cases, severely damaged. Photo: Henning Frase

Flood prevention

In 2017, Goslar experienced a flood that caused extensive damage to the Old Town. Nearly nine years have passed since then. Current climate projections indicate that parts of the World Heritage Site may be affected by heavy rainfall more frequently in the future, meaning that another flood could cause even more severe damage. Following the event, the damage was systematically documented, and a legally binding floodplain was designated for the Old Town. At the same time, the city implemented a series of measures. The fire department was equipped with better technology, and modern, AI-sensor-based early warning systems were installed. Additionally, an underground water retention reservoir was constructed within the city limits. The Herzberg Pond is to be fitted with a bottom outlet so that it can be used as a buffer basin. Furthermore, plans are moving forward to construct a diversion tunnel from the Gose River to the Granetal Dam. This tunnel, in combination with the Herzberg Pond, would divert a significant volume of water away from the old town.

Utility lines

Similar to the poor condition of the roads, the utility lines are also in a state of disrepair. There is no discernible plan for a comprehensive renewal; the costs are likely to be on a similar scale to those of road rehabilitation and will negatively impact Goslar's status as a business location in the future. The incumbent mayor holds a seat on the supervisory board of the responsible energy supplier, Harz Energie, and has been informed of these developments for years.



Fig. 4: An underground power line on Schreiberstraße during a partial renovation, showing a comparison between the old and new lines. Photo: Henning Frase

Kaiserpfalz Quarter – a major urban development site in the Old Town

In August 2025, after eleven years of planning, the investor for a hotel and civic center in the Kaiserpfalz Quarter withdrew from the project. Ever since the federal government had transferred the site to the city of Goslar in 1998, the city administration has tried in vain to market the area, but several development agreements have come to nothing.

Despite new talks with three investors, this prime property remains vacant to this day and serves as a prime example of dysfunctional interaction between politics, administration, and the public. For nearly 28 years, valuable resources have been blocked at times — evident also in the increasing neglect of the Old Town, with its dilapidated streets and buildings in need of renovation.



Fig. 5: Aerial view of the site of the planned Kaiserpfalz Quarter, which has lain vacant since the demolition of the barracks. Photo: Günter Piegsa

The overall situation can no longer be adequately addressed with the local resources currently available, and highlights a dysfunctional administration as well as structural deficits in cooperation with political and economic actors, leading to prioritizations that jeopardize the long-term preservation of the World Heritage site.

The Upper Harz Water Management

In the Upper Harz Water Management system, climate change, widespread forest damage caused by bark beetle infestations, and new water management interests are increasing pressure on a sensitive, large-scale system of man-made ponds, ditches, and watercourses.

Changed precipitation patterns resulting from climate change, increasing heavy rainfall events, and the resulting erosion processes are impairing the function, integrity, and appearance of this central World Heritage component. The damage caused by forestry operations to the historic ditch systems is particularly severe. In the Lower Saxony part of the Harz Mountains, the damaged area covers approximately 30,000 hectares. Similar conservation issues affect the numerous underground tunnels and watercourses. The system comprises a total of 107 reservoirs, approximately 310 km of water ditches, and around 30 km of underground watercourses. The so-called active system is maintained by the Harz Waterworks, but the passive system, which is no longer under regular maintenance, is suffering increasing damage while a state of conservation assessment has never been made. A management plan for its long-term conservation is currently not available.



Fig. 6: In numerous cases, ditches have been filled in for forest roads and have completely disappeared, as here at the Ernst August Ditch. Photo: R. Pake 2025

Required measures and recommendations

To safeguard the outstanding universal value, as well as the integrity and authenticity of the World Heritage property, a clear political and technical reorientation is required, along with active support from the World Heritage Committee and the Federal Republic of Germany as a State Party to the Convention. The following are of particular and immediate necessity:

- A more transparent approach by those responsible, dealing openly with existing problems.
- The rapid development, adoption, and implementation of an integrated management plan for all components of the World Heritage property, based on a comprehensive, updated assessment of the site's condition and risks, as well as a supplementary assessment of social structures.
- The securing of reliable and sufficient financial resources for priority measures in the areas of roads, utilities and waste management, flood protection, historic buildings, mines, components of the Upper Harz Water Regale, and archival sources.
- Increasing the staffing and expertise of local historic preservation authorities and the State Office for the Preservation of Historic Monuments, as well as ensuring that political leaders refrain from undermining historic preservation efforts.
- Identifying and supporting qualified skilled tradespeople in light of apparent labor shortages and a lack of technical qualifications.
- Strengthening the relevant technical structures at all levels (foundation, municipalities, region) in terms of staffing, technical expertise, and coordination capabilities.
- Establishing a robust monitoring system for structural, technical, and climate-related risks with clearly defined indicators and regular reporting.
- Intensifying communication and awareness-raising efforts targeting policymakers, the business community, and the general public on the importance of the property as an essential component of the site's own identity, in order to improve acceptance of heritage conservation requirements and foster broad support for the preservation of the World Heritage site.
- In light of the structural protection deficits and cumulative threats described above, the possibility of inscribing the World Heritage site on the List of World Heritage in Danger should be examined and prepared as a technically justified option should the aforementioned corrective measures not be implemented within a reasonable time frame.

Threats to the Cultural Landscape and Key Sightlines of the Erzgebirge / Krušnohoří

Anonymous[1]

The current regional planning process for wind energy zones in the Chemnitz region (Saxony, Germany) poses a serious and imminent threat to the integrity of the Erzgebirge/Krušnohoří World Heritage Site. In Draft Resolution No. 01/2026 of the 40th meeting of the Association Assembly (25 March 2026), extensive areas in the Jöhstadt–Königswalde–Grumbach–Arnsfeld region (designated as WEG 83, 84, and 85) were identified as potential wind energy sites[2]. These areas lie directly within the visual catchment of some of the most iconic and culturally significant viewpoints of the Annaberg Buchholz region (Fig. 1).



Fig. 1: The location of planned wind farms (marked in beige) near Annaberg-Buchholz.
Map adapted from https://beteiligung-regionalplan.de/rpchemnitz/beteiligung.php#) ROPW Karte 1.2

The planned wind turbines — likely exceeding 200 meters in height — would fundamentally alter the historic skyline of Annaberg-Buchholz and the surrounding mining landscape. Their visual impact would be particularly severe because the proposed sites lie on elevated ridges that rise behind or beside the Pöhlberg, one of the region's most defining landscape features.

Impact on key vantage points and the historic skyline

Many of the region's most valued viewpoints would be directly affected. These include the Schreckenberg, Dörfler Höhe, the upper section of Hauptstraße in Frohnau, the Teufelskanzel, the Halde Buchholz, and the Sehmaer Höhe. From these locations, the Pöhlberg forms a central visual anchor that shapes the identity of Annaberg-Buchholz and its surroundings.

The distances involved make the impact even more striking:

- Dörfler Höhe to Pöhlberg: approx. 4 km
- Dörfler Höhe to WEG 83/84/85: approx. 8–10 km
- Elevation of Dörfler Höhe and the ridge between Pöhlberg and Morgensonne: approx. 700 m
- Elevation of the Königswalde–Jöhstadt ridge (WEG 85): approx. 800 m

Given these parameters, turbines of >200 m height would visually dominate the Pöhlberg, rising far above its silhouette and destroying the landscape-defining skyline that has shaped the region for centuries.

This view is deeply rooted in the cultural memory of the local population. It is widely used in regional marketing and even incorporated into the official city logo of Annaberg-Buchholz.

1 The author is known to World Heritage Watch

2 https://beteiligung-regionalplan.de/rpchemnitz/beteiligung.php#

The introduction of industrial-scale turbines into this panorama would irreversibly alter a landscape that is both culturally symbolic and emotionally significant.

Disruption of the Ore Mountain Ridge landscape

The ridge region between Jöhstadt and Brettmühle (WEG 85) is one of the most impressive continuous mountain horizons in the Ore Mountains. The existing small turbines of the Jöhstadt wind farm would be dwarfed many times over by modern turbines. The resulting industrial skyline would fundamentally contradict the Outstanding Universal Value (OUV) of the World Heritage Site, which is based on the mining landscape's authenticity, historical continuity, and visual coherence.

Impact on the high ridge panorama seen from the viewpoint Neundorf / Kalter Muff

The Kalte Muff viewpoint offers one of the most iconic long-distance views across the peaks of the Ore Mountains. All three proposed wind energy zones would intrude into this panorama, replacing the historic mining landscape with a line of industrial structures hundreds of meters high.

The uncertain status of the Hermannsdorf wind farm

Although the planned Hermannsdorf wind farm no longer appears in the current draft of the regional plan, its actual status remains unclear. The project developer (VSB Group) continues to list the project publicly on its website[3], without providing transparent updates on its progress or cancellation status. This lack of communication leaves the public uninformed and raises concerns that the project may continue outside the regional planning framework or re-emerge at a later stage.

The potential visual intrusion into the setting of St. Anne's Church—one of the most important architectural monuments of the Ore Mountains—would be severe. Even the possibility of



Fig. 2: View from Dörfler Höhe toward Annaberg and Pöhlberg, with WEG 83/84. Photo by the author



Fig. 3: View from Pöhlberg toward Königswalde with WEG 85. Photo by the author



Fig. 4: View from Neundorf / Kalter Muff toward Pöhlberg with WEG 83–85. Photo by the author



Fig. 5: View of St. Annenkirche with planned Hermannsdorf wind farm in the background. Photo by the author

3 https://www.vsb.energy/de/de/projekte/windpark-hermannsdorf

such a project proceeding without public clarity underscores the need for strict heritage-based oversight.

Cultural, social, and emotional significance

The affected landscapes are not only historically important—they are deeply embedded in the identity of the local population. Generations of residents associate these views with their sense of home, belonging, and cultural continuity. The proposed wind energy zones would not only damage the World Heritage Site but also undermine the cultural landscape that shapes regional identity.

The loss of World Heritage status in Dresden in 2009 stands as a stark reminder of what can happen when large-scale infrastructure projects are prioritized over heritage protection. A similar outcome must be avoided in the Erzgebirge at all costs.

Call for immediate action

Given the scale of the potential damage, it is essential that the planning authorities, together with the State Office for the Preservation of Historical Monuments and the local heritage authorities, reassess the suitability of WEG 83, 84, and 85. The protection of the World Heritage Site must be treated as a priority of the highest order.

The author of this report wishes to remain anonymous due to the sensitivity of the ongoing planning process and the polarized public debate.

Public participation

The regional planning process is currently open for public comment. Citizens, organizations, and experts can submit their statements via the official participation portal.[4] Broad public engagement is crucial to ensure that the cultural landscape of the Erzgebirge/Krušnohoří is preserved for future generations.

Conclusion

The proposed wind energy zones WEG 83, 84, and 85 pose a severe threat to the visual integrity, cultural identity, and Outstanding Universal Value of the Erzgebirge / Krušnohoří World Heritage Site. The scale of the planned turbines, combined with their placement on elevated ridges, would irreversibly alter some of the most iconic landscapes of the region.

Protecting this heritage is not only a legal obligation but a moral one. The World Heritage Site represents centuries of human history, mining culture, and landscape development. It must not be sacrificed to planning decisions that fail to consider its unique and irreplaceable value.

4 https://beteiligung-regionalplan.de/rpchemnitz

Corruption and Unchecked Tourist Development Threaten the Curonian Spit

Eugene Simonov, Rivers without Boundaries International Coalition

The Curonian Spit, a transboundary World Heritage property shared by the Russian Federation and Lithuania, is a unique cultural landscape of sand dunes, forests, and historic fishing settlements. Inscribed in 2000, its Outstanding Universal Value (OUV) is defined by its fragile natural-cultural harmony and its status as a critical corridor for the White Sea-Baltic bird migration route. However, as of early 2026, the property's integrity is under unprecedented threat. A combination of aggressive large-scale tourist infrastructure projects, the systematic weakening of federal environmental legislation, and high-level management corruption has created a crisis that the State Party's current reports fail to adequately address.

The Rybachy Project and the artificial island

The most immediate physical threat to the site is the proposed investment project in the village of Rybachy. Initially reported in 2024 as a hotel and recreational complex with a height of 21 meters, the project's scope has significantly expanded. Current plans involve the creation of an artificial land plot (island) in the water area of the Curonian Lagoon within the buffer zone of the property. This effectively modifies the coastline of the Curonian Spit itself and radically disrupts natural geomorphological process shaping this World Heritage Property.

The project now includes plans for hotel structures reaching heights of up to 25 to 30 meters. This development directly contradicts the traditional architectural scale of the historic fishing villages, which is a key attribute of the cultural landscape. Furthermore, the State Party has consistently claimed that assessing the impact of this project is "premature" due to ongoing research. This stance is a transparent attempt to bypass Paragraph 118bis of the Operational Guidelines, which requires impact assessments to be conducted prior to decisions that may be difficult to reverse.

Threats to migratory bird populations

The Curonian Spit is a bottleneck for the White Sea – Baltic Migration Route, with 10 to 20 million birds passing through annually. On peak days, over one million birds fly over the spit. The construction of high-rise buildings (up to 30 meters) with extensive glass facades and bright nocturnal lighting poses a lethal threat.

Bird collisions with glass structures are already a leading cause of population decline globally. In conditions of poor visibility — frequent in the Baltic region — migrating birds are disoriented by artificial light and trapped in "light wells," leading to mass



Fig. 1: Demolition debris at the future hotel construction site in Rybachy Village. Photo: Rivers without Boundaries

mortality. Expert scientists from the Rybachy biological station of the Zoological Institute of the Russian Academy of Sciences have reportedly refused to endorse mitigation measures for the project, viewing the current designs as fundamentally incompatible with bird safety. Rather than adjusting the project, proponents have responded by seeking "other experts" who might provide more favourable assessments, further undermining the scientific integrity of the planning process.





Fig.s 2 and 3: Design of the artificial island and full marina. Source: Project documentation disclosed for consultations, April 2026

Legal deregulation: decree no. 582-r

A critical turning point occurred on March 20, 2026, when the Russian Government issued Decree No. 582-r. This decree permits the construction of facilities up to 30 meters in height within national parks, effectively removing previous restrictions that limited buildings to 15 meters and three storeys.

This legislative change appears specifically tailored to accommodate large scale tourst development, e.g., the "Three Volcanoes Park" project in Kamchatka and the Rybachy project in the Curonian Spit. By unilaterally increasing height limits, the State Party has removed the primary legal barrier that previously hindered large-scale commercial development within the World Heritage site. In case of Curonian Spit such a change significantly increases the risk of collision for migratory birds.

Management failure and criminality

The credibility of the site management was shattered in January 2026 with the arrest of Anatoly Kalina, the Director of the "Kurshskaya Kosa" National Park. Kalina, who had headed the park since 2011, is under investigation for organizing illegal logging within the protected area.

According to the regional Investigative Committee, Kalina used his official position to facilitate the illegal cutting of over 150 cubic meters of timber across one hectare of the national park. The purpose of this illegal land clearing was to prepare sites for commercial "glamping" facilities for tourists. The damage to the UNESCO-recognized territory is estimated at over 12.7 million roubles. This incident proves that the current management administration is not only failing to protect the OUV but is actively participating in its destruction for private commercial gain. The "Master Plan" and "Environmental Protection Measures" touted in the State Party's conservation reports cannot be considered reliable when the primary enforcement authority is implicated in criminal environmental degradation.

Preparatory work for construction camps in Rybachy is already underway despite the lack of a completed Heritage Impact Assessment (HIA) or Environmental Impact Assessment (EIA) submitted to the World Heritage Centre. This "fait accompli" approach to development is a direct violation of the Operational Guidelines and threatens the status of the Curonian Spit as a transboundary treasure.

Public consultations started in April 2026

On April 15, 2026 a company "SPETSAUTOTRANS" LLC (Moscow) announced public consultations on the Environmental Impact Assessment documentation "*Construction of an interna-*

tional passenger river checkpoint, a breakwater, and a hotel and recreation complex, and reconstruction of hydraulic structures in the village of Rybachy, Zelenogradsk Municipal District, Kaliningrad Region. ***Stage 1: Hydraulic structures, reclaimed land area, and water area".*** *(Although after a public outcry and first comments of experts the documentation was withdrawn and a scheduled public consultation meeting cancelled around May 1, 2026, nothing precludes the developer to repeat this attempt later after the World Heritage Committee session is over.)*

The initial examination that the EIA documentation violates several clauses of Russian law, does not cover the full scope of the proposed activities, contains contradictory information regarding the basic parameters of the project, confirms adverse impacts on aquatic biological resources and bird populations, lacks a sufficient assessment of the risks associated with the extraction of bottom sediments, fails to include a transboundary impact assessment, and does not provide a comprehensive analysis of alternative options for implementing the proposed activities. In particular, this substandard document violates several key requirements of the Guidance and Toolkit on Impact Assessment in World Heritage Context, such as:

- Assessment of potential impacts on OUVs of the WH properties and compilation of dedicated chapter summarizing those impacts (it is absent);
- Assessment of alternatives to activities that could impact World Heritage (it is not valid);
- Assessment performed in a wide area where these impacts may occur (EIA is confined to the construction site and does not address even impacts of transportation by sea);
- Avoiding artificial division of project documentation in sections and stages to explore assessments of the full spectrum of impacts and cumulative effects on the World Heritage (the project is deliberately divided in several parts to avoid a holistic assessment).

Looking at the EIA we doubt that with those gaps it could be submitted for mandatory review by the Convention's Advisory Bodies.

A positive decision on this project would be greatly facilitated by presently proposed amendments to the Law on Protected Areas, which, if passed, will allow to place projects of "national importance" inside protected areas. Besides the EIA document mentions that proposed marina will be used to base special boats of the Federal Security Service, which adds to arguments on the alleged "high national importance" of the proposed development.

Conclusion and recommendations

The Curonian Spit has reached a tipping point. The combination of high-rise construction on an artificial island, the removal of legal height restrictions for buildings, and the criminal involvement of the National Park's leadership constitutes a clear case of "ascertained danger" under § 179 of the Operational Guidelines.

We propose that the World Heritage Committee:

1. **Request an immediate Reactive Monitoring Mission** to the site to assess the damage caused by illegal logging and the potential impacts of the Rybachy tourist development project.
2. **Demand the immediate suspension of all construction activities** and preparatory works in Rybachy until a comprehensive Heritage Impact Assessment has been developed for the FULL (all stages, not just #1) as a part of an EIA, and reviewed by ICOMOS and IUCN.
3. **Urge the State Party to repeal or exempt World Heritage sites from Decree No. 582-r,** restoring the 15-meter height limit as a minimum safeguard for the cultural landscape.

The international community must act to ensure that the Curonian Spit remains a protected landscape for millions of migratory birds and a testament to human-nature harmony, rather than a site for irresponsible high-rise development and corruption.

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Guidance and Toolkit on Impact Assesment in World Heritage Context. https://whc.unesco.org/en/guidance-toolkit-impact-assessments/

Urgent Citizen Report on the "Pogradec Marina" Project and Risks to Lake Ohrid

Stop Kullave Pogradec

We are submitting this report as an urgent appeal regarding a proposed large-scale development on the Albanian shoreline of Lake Ohrid World Heritage property, in the city of Pogradec. As Lake Ohrid is a UNESCO World Heritage property inscribed for its Outstanding Universal Value, any intervention within its immediate shoreline, buffer zone, and visual basin raises significant concerns related to heritage protection, environmental sustainability, and landscape integrity.

According to publicly available information, the proposed project, referred to as "Pogradec Marina", includes the construction of a high-rise complex reaching up to 27 floors, situated directly along the lake shore in a highly sensitive zone. The project has been associated with the company *"Arlis shpk"*, according to circulated project materials and media reports. The site currently comprises a dense and mature green area, one of the oldest public beaches in the city, and a natural stream descending from the western hills of Pogradec into Lake Ohrid (known locally as *Lumi i Pogradecit*). This stream forms part of a natural ecological and hydrological corridor, contributing to the continuity between surrounding hills, the urban fabric, and the lake ecosystem[1].

The cultural and ecological significance of the site

The area has long functioned as a public park and recreational landscape, playing an essential social role in the everyday life of the city. Furthermore, the site includes two buildings of notable historical and architectural value:

- an early hotel dating from the 1930s–1940s period, representing an important phase of early lakeside tourism and urban development in Pogradec;
- a multifunctional recreational building from the socialist period (known locally as Oktapodi), characterized by a unique architectural language and strong cultural significance in the collective memory of the local community.

Together, these elements form part of the layered urban and cultural landscape – a relationship that extends back thousands of years, from prehistoric habitation through antiquity to the present day. The city has traditionally developed in close harmony with the lake, maintaining a modest scale, open vistas, natural corridors, and accessible shores that preserve both visual and functional connections between the urban environment and the water.

The scale, height, and intensity of the proposed development appear fundamentally incompatible with the fragile lakeshore ecosystem and the established character of this area.

A structure of such magnitude risks causing irreversible impacts on panoramic views, visual corridors, biodiversity, water quality, and the integrity of both tangible and intangible heritage values associated with Lake Ohrid. It would significantly alter the poetic, human-scale landscape that has long defined Pogradec and its identity.

World Heritage obligations and irreversible impact

We are particularly concerned that this proposal appears to conflict with the objectives and guiding principles set out in the **World Heritage Supplement to the Management Plan for the Pogradec Terrestrial/Aquatic Protected Landscape (2017–2027)**[2]. This management framework explicitly identifies poorly planned and executed development, especially along the coastal zone, as a major threat to the Outstanding Universal Value of the property (refer to section 2.3.2, page 33.). It further emphasizes that the scale, location, and form of new construction must respect ecological continuity, cultural landscapes, and the historic relationship between settlements and the lake, and that development within the buffer zone must be strictly controlled to safeguard the integrity and visual coherence of the World Heritage property (Programme 3, page 47)

Moreover, UNESCO's Operational Guidelines and the Lake Ohrid Management Plan both stress the application of the precautionary principle, particularly in contexts where scientific uncertainty exists and where potential impacts may be irreversible. Given the exceptional sensitivity of Lake Ohrid's oligotrophic

1 Recognized also by National Agency of Protected Zones: https://akzm.gov.al/peizazhi-i-mbrojtur-liqeni-i-pogradecit-2/

2 https://whc.unesco.org/en/list/99/documents/

ecosystem, its high level of endemism, and the cumulative pressures already affecting the lakeshore, any intervention of this magnitude should be approached with extreme caution. In such circumstances, the absence of clear evidence of harm cannot justify proceeding with a development that carries a high risk of long-term and irreversible damage.

The introduction of a high-rise complex on the immediate shoreline also risks setting a dangerous precedent for further large-scale interventions around the lake, potentially undermining the regulatory framework and long-term conservation efforts established through the transboundary World Heritage designation and its associated management instruments.

Current situation and request for urgent attention

As independent citizens without access to official project documentation or institutional resources, we have attempted to gather and verify information through publicly available materials, institutional requests, and civic initiatives. In response, we independently initiated an online civic campaign and **public petition** in order to raise awareness and gather information regarding the proposed intervention. In a very short period of time, **more than 1,900 people signed the petition**, expressing deep concern over the scale of the project and its potential consequences for Lake Ohrid, biodiversity, public space, and the cultural landscape of Pogradec. Public petition link: *Change.org Petition – Stop Towers in Pogradec.*

We have also formally addressed several Albanian institutions, including the *Municipality of Pogradec, the Ministry of Tourism and Environment, and the Territorial Development Agency*, requesting access to official information and clarification regarding the project, its approval procedures, environmental assessments, and compliance with World Heritage obligations. To date, no substantial public response or clarification has been provided.

Most recently, we have prepared a letter addressed to the *Prime Minister of Albania*, requesting urgent reconsideration of the project and greater institutional responsibility regarding the protection of the Lake Ohrid World Heritage property.

According to information currently circulating, parts of the approval process may already be advanced, increasing concerns that construction could proceed before independent international review and assessment can take place. **This report is therefore submitted as an urgent call for preventive attention and timely action, before irreversible transformation and environmental harm affect the shoreline of Lake Ohrid.**

In this context, we respectfully request that UNESCO and its Advisory Bodies:

- seek detailed information from the relevant national and local authorities regarding the scope, approval process, and compliance of this project with the Lake Ohrid Management Plan and World Heritage obligations;
- assess its potential impact on the Outstanding Universal Value, integrity, and authenticity of the Lake Ohrid World Heritage property, including cumulative and visual impacts;
- encourage the application of stricter planning controls, comprehensive Environmental and Heritage Impact Assessments, and alternative development approaches that prioritize conservation, public interest, and sustainable, context-sensitive development.

Lake Ohrid is not only a shared natural and cultural heritage of humanity, but also a living cultural landscape deeply embedded in the identity, memory, and daily life of its local communities. Its protection requires vigilance, transparency, and responsible decision-making grounded in internationally agreed principles. We trust that UNESCO's continued commitment to safeguarding World Heritage Sites will help ensure that Lake Ohrid and its shores are preserved for present and future generations.

Visual Documentation of the "Pogradec Marina Project"





Fig. 1–2: Computer rendering of the "Pogradec Marina Project"



Fig. 1–2: Computer rendering of the "Pogradec Marina Project"









Fig. 4 – 7: Historic views of the project area

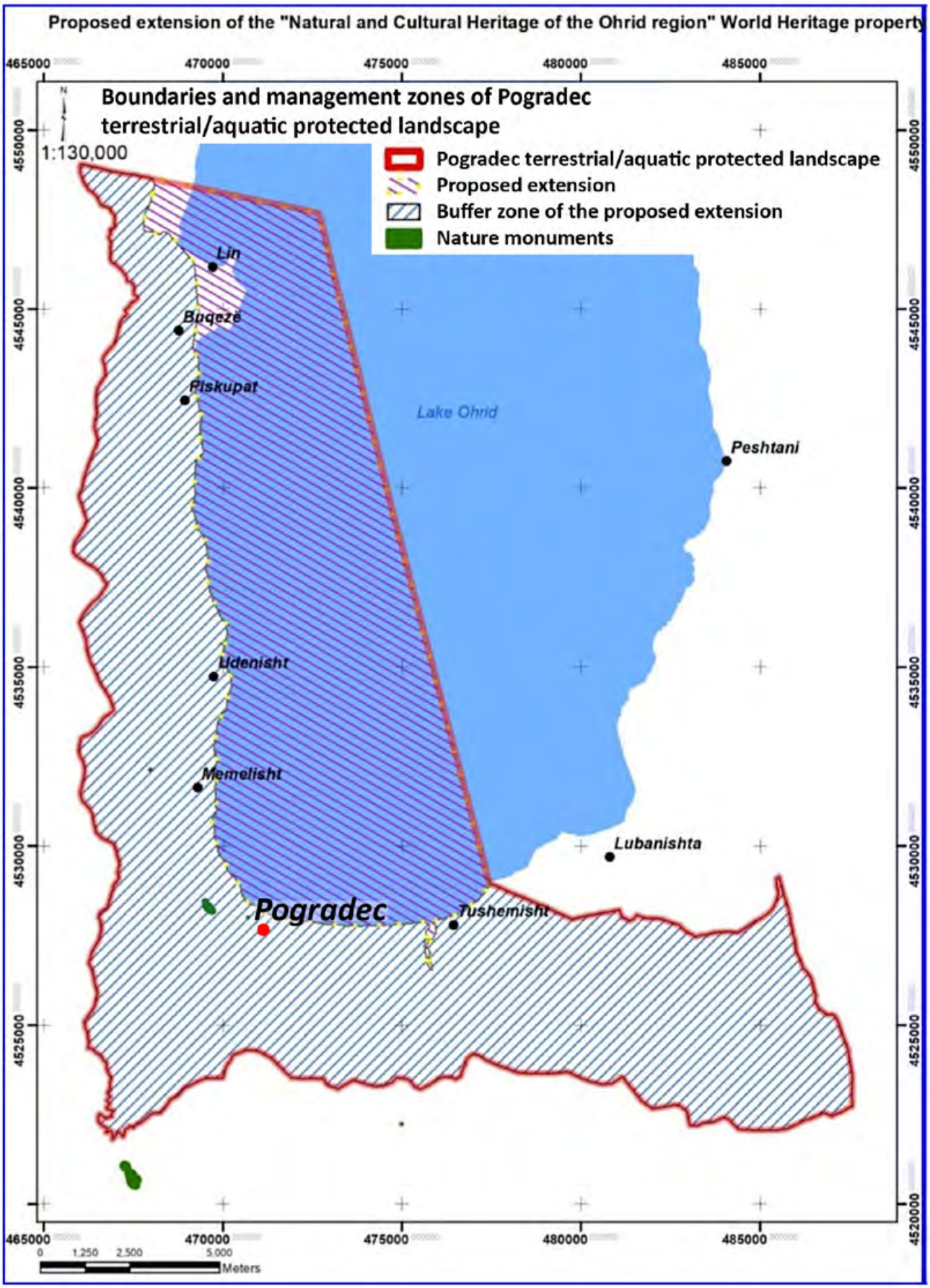


Fig. 8: Map of the Albanian part of the Natural and Cultural Heritage of the Ohrid Region

Thirty Years After Inscription: Upper Svaneti in a Worse State than in 1996

Manana Tevzadze, ICOMOS Georgia
Maki Kvitsiani, Independent Researcher

This report is the fourth contribution on the World Heritage property of Upper Svaneti, Georgia, within the World Heritage Watch publication series, setting it apart by a five-year interval from the most recent report of 2021. It aims to present an updated assessment of the state of conservation of the World Heritage property, with a focus on the hamlet of Chazhashi within the Ushguli village. It reports on its condition since the last report, in light of ongoing and unresolved concerns. It reveals that regrettably, despite repeated warnings and calls for corrective action from the civil society organisation, the situation has not improved, on the contrary, several of the previously identified threats have intensified.

2026 marks 30 years since the inscription of Upper Svaneti on the UNESCO World Heritage List in 1996, an anniversary that would ordinarily provide an opportunity to reflect on successful conservation and development outcomes. However, the date is met by a growing discrepancy between the site's Outstanding Universal Value and its current state of conservation. Moreover, to this date it still does not have a conservation management plan. The main aim of this report is therefore to express renewed concern and to draw attention within UNESCO, its Advisory Bodies and the World Heritage Centre to the continued degradation of the property's OUV, and to emphasize the urgency of internationally supported action.

Background

Concerns regarding the state of conservation of Chazhashi hamlet and the wider Ushguli village are not new. As documented in the previous three reports, the WH property has for several years been affected by a combination of challenges. These were of structural, managerial, and regulatory character, posing a direct threat to the OUV, causing significant damage and loss of the authentic historic fabric, the traditional settlement structure, its setting and the integrity of the property.

The 2021 report identified the endangered condition of the historic fabric as a result of inappropriate restoration works that were not in line with internationally accepted conservation principles. The continued use of non-traditional and incompatible materials and techniques were listed as contributing to the loss of authenticity and the long-term stability of the structures.

For more than a decade, the persistent lack of effective control over new construction and development within the property and its buffer zone, has been of major concern. Unauthorised building activities remained evident in villages of Chvibiani and Zhibiani, as well as in close proximity to Chazhashi. The expansion of informal settlement east of the property had been flagged already in 2021, disrupting the visual corridors and noting it "is a threat to the harmonious relation of historic Ushguli with its spectacular environment and violates the integrity of the property." [1]

Besides, the property has suffered through lasting institutional and governance shortcomings, such as lack of regulatory documents and structures, limited enforcement capacity, and insufficient engagement with concerned civil society and independent heritage experts. Despite much public and media attention in recent years, these issues have not yet been addressed through corrective action or a coherent long-term conservation strategy.

Current challenges and concerns

To this date, the entire property, its historic building stock, including medieval tower houses and associated vernacular structures - machubis, and the surrounding landscape remains in a fragile state mostly as a result of inappropriate interventions, such as inappropriate repair practices, restoration works and lack of maintenance.

Unauthorized building activity

The settlement of Lamjurishi, which has been reported expanding in the immediate vicinity of Chazhashi, was initiated in the 1990s. The settlement was initially established by residents of Murkmeli – the third hamlet of Ushguli, downstream from Chazhashi – who were affected by natural disasters. However, its uncontrolled and intensive expansion began in 2014 and has become particularly evident since 2021. In general, the intensification of unauthorized construction is evident since 2019 when the temporary construction moratorium introduced in 2017 was lifted. This process has taken on an irreversible character and is causing serious damage to the property, disrupting the historic landscape and the spatial integrity of the historic settlement of Chazhashi. In recent years, a number of hotels, guesthouses,

and restaurants have been constructed in Lamjurishi, within the buffer zone of the WH property (Fig.1). Despite the fact that a general planning document has been in place for Ushguli since 2021, the document has not yet been approved by the Mestia Municipality, and construction activities continue to take place in an uncontrolled and unregulated manner.

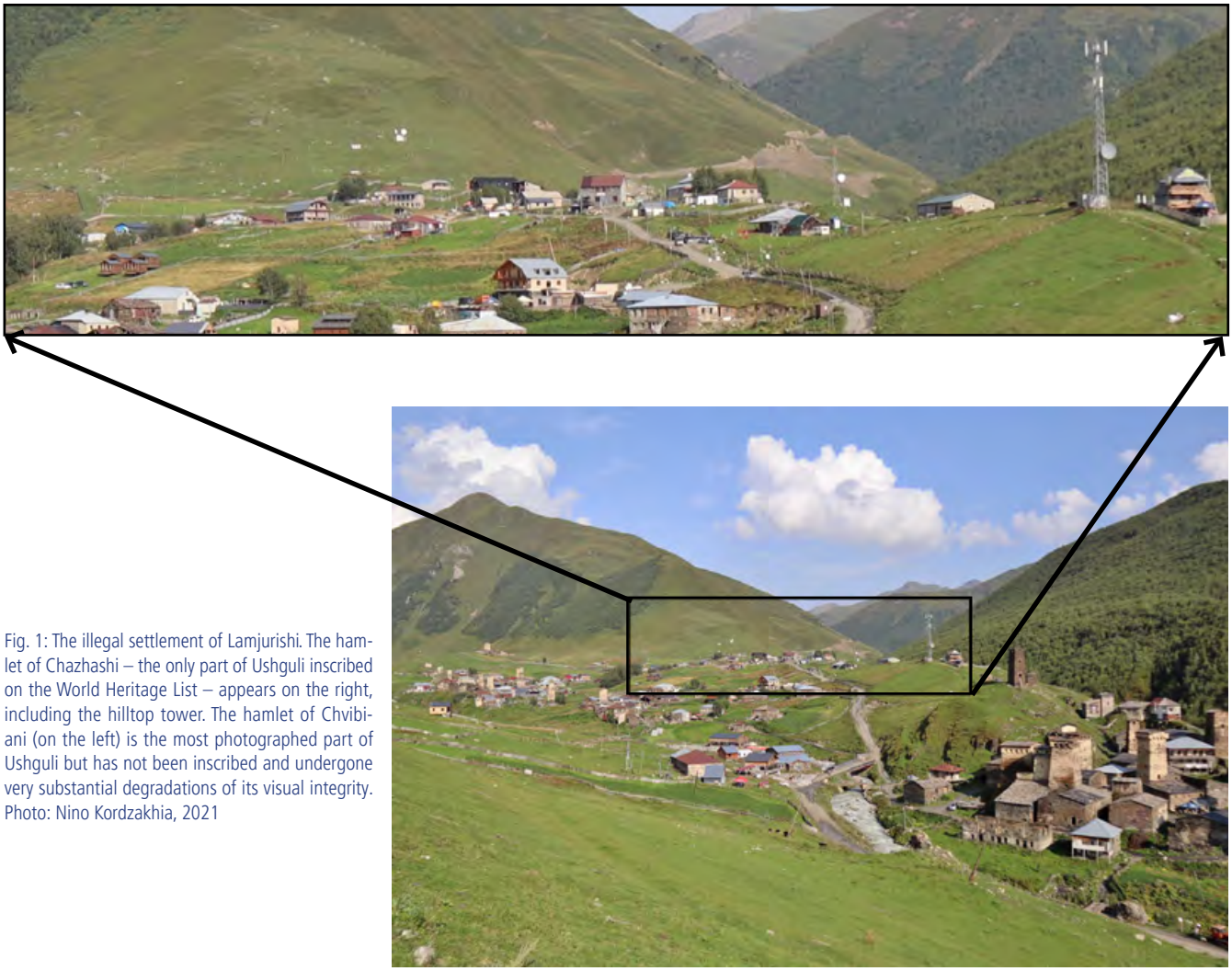


Fig. 1: The illegal settlement of Lamjurishi. The hamlet of Chazhashi – the only part of Ushguli inscribed on the World Heritage List – appears on the right, including the hilltop tower. The hamlet of Chvibiani (on the left) is the most photographed part of Ushguli but has not been inscribed and undergone very substantial degradations of its visual integrity. Photo: Nino Kordzakhia, 2021

Damages to individual buildings

According to local reports, in 2023, the wall of one of the *machubis* in Chazhashi collapsed (Fig. 2). To date, the structure remains unattended, and no consolidation or stabilization works have been undertaken. According to a local from Murkmeli, who prefers to stay anonymous, "its condition has continued to deteriorate since 2023; Unfortunately, there has not been a response from the heritage protection authorities." This ongoing inaction poses a serious threat to the long-term structural stability of the monument and to the preservation of its authentic fabric.

There has been no follow-up action taken by the National Agency for the Preservation of Cultural Heritage of Georgia (NAPCHG), nor has it responded with a public statement on any of its communication channels. The same group undertook temporary emergency measures in response to damage of the southern wall of the base of the Church of the Saviour's Gate in Chazhashi hamlet (Fig 6). In both instances, the damaged



Fig 2: The machubi of the Nizharadze family in the village of Chazhashi showing its collapsed wall from 2023. Photo: an anonymous local of Murkmeli
Furthermore, a local café "Enguri Tower" reports on its Facebook page about locals' efforts to stabilize endangered structures. In 2025, the cafe owners with their funds and with the help of the local community reinforced the lower part of the northern wall of St. George's Church in Chazhashi which had partially collapsed (Fig 3, 4, 5).



Fig 3: Chazhashi St. George's church in 1999. Photo: ICOMOS Georgia



Fig 4: Damage to the northern wall of St. George's Church in Chazhashi, 2025. Photo: facebook page "Enguri Tower"

sections were secured with a metal structure, providing only a provisional solution and not ensuring adequate protection of the listed building located within the core zone of the WH property.

Negative effects of tourism development

Tourism is one of the principal challenges posing a growing threat to Ushguli. While it provides important economic opportunities for the local population, the illegal construction processes discussed above are directly linked to unplanned tourism development, causing significant damage to the site's authentic fabric. The absence of a dedicated tourism management plan undermines prospects for sustainable development. Moreover, the loss of authenticity and the potential endangerment of World Heritage status would ultimately diminish Ushguli's attractiveness as a tourism destination.



Fig 5: Temporary stabilization / consolidation works on the northern wall of St. George's Church in Chazhashi undertaken by the locals following partial collapse of the foundation, 2025. Photo: facebook page "Enguri Tower"



Fig 6: Damage and emergency stabilization of the southern wall of the base of the Church of the Saviour's Gate in Chazhashi hamlet, 2025. Note the precarious almost vertical slope. Photo: facebook page "Enguri Tower"

Unresolved issues in site management and protection

Ushguli continues to face a set of interrelated and long-standing managerial challenges that remain unaddressed over the years. Most urgent among them remains the need for a permanent on-site monument protection unit focusing on monitoring and emergency response. This need is underscored by the fact that the site is infrastructurally isolated for more than half of the year due to its prolonged and severe winter conditions.

The recommendations from ICOMOS Georgia for the "creation of a feasible management system through the implementation of pilot programmes covering issues relating to site management".[2] have not been addressed and there is no plan for focused pilot programs or creating practices involving and empowering the local community in all aspects of site conservation and management.

Lack of awareness among local residents regarding the cultural value of the site and the irreversible losses inappropriate activities entail, also remains critical, highlighting the necessity of targeted training and awareness-raising programmes.

Request to the World Heritage Centre

In light of the continued deterioration of the state of conservation of the property, and given that the concerns identified in earlier reports remain unresolved and have in several respects intensified, we call upon the WH Centre to take a more active role in addressing the situation.

Of continued concern is the fact that, over the period of 30 years, no Reactive Monitoring or Advisory Mission has taken place by the WH Centre or its Advisory Bodies, despite persistent reports of inappropriate interventions, uncontrolled development, and mounting pressures on the historic fabric and setting of the property.

Thus, it is urgently needed that the World Heritage Centre:

- Initiate a Reactive Monitoring Mission with its Advisory Bodies, in order to conduct an independent, on-site assessment of the site's state of conservation and request the State Party to address the situation and take concrete corrective actions in due time.
- Follow-up with rigorous communication with the State Party, reiterating seriousness of the situation and pointing out the possibility of inscribing the property on List of WH in Danger, should the current trends continue and effective corrective action not be taken.

In this context, the report explicitly requests that Upper Svaneti be placed on the agenda of the forthcoming WH Committee meeting under the State of Conservation item, in order to enable formal consideration by the Committee and to facilitate timely and effective follow-up action.

Conclusion

Against the backdrop of the wider democratic backsliding of the country and the current developments in Georgia's cultural heritage sector, which since recent years have been a serious concern among civil society, professionals and international observers, the need for international attention and engagement is particularly acute. In the present situation meaningful corrective action at national level cannot be assumed. As demonstrated by the continuing crisis at other World Heritage properties, notably Gelati, also reported within WHW Report series over the years, the risks facing Upper Svaneti are not isolated, but symptomatic of a wider systemic problem. In this context, the actions requested above aim at mobilising international scrutiny and support for preventing further irreversible loss of the property.

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ICOMOS Georgia Statement on the situation in Chazhashi (Ushguli Community, Upper Svaneti)

https://drive.google.com/file/d/1KcUCkFcwszelsSiM0UBAchuL_esXxTZ4/view

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Djerba Under Pressure: Environmental Change, Human Pressures and Management Challenges

Houda Ben Younes, Alteradvise

The World Heritage serial property of Djerba "Testimony to a Settlement Pattern in an Island Territory" was inscribed on the UNESCO World Heritage List in 2023 for its distinctive settlement pattern developed between the 9th and 18th centuries in response to water scarcity on an insular territory. While the inscription has been broadly welcomed and has increased international visibility, the ongoing preservation and management of serial property remain major challenges.

Significant portions of Djerba's cultural heritage have already been lost as a result of climate-related impacts and prolonged neglect, while many of the remaining monuments continue to deteriorate after years of insufficient maintenance. Chronic shortages of funding, weak institutional frameworks, and limited technical capacity have resulted in many of these heritage assets being abandoned or poorly maintained.

Observed and projected climate impacts on the island

Djerba's World Heritage is under increasing threat from the accelerating impacts of climate change. Key environmental stressors, namely altered rainfall patterns, rising sea levels, and coastal erosion, pose direct and compounding risks to the island's architectural heritage, water infrastructure, and coastal settlements.

Rainfall patterns

Climate change has intensified pre-existing environmental vulnerabilities on the island, particularly through shifts in rainfall regimes. Climate models project a potential decline in annual precipitation of up to 20% by the end of the century, accompanied by more frequent and prolonged droughts[1]. These trends directly undermine Djerba's traditional water management systems, most notably its extensive network of rainwater cisterns.

Historically, chronic water scarcity shaped Djerba's dispersed settlement pattern and gave rise to decentralized rainwater harvesting systems. Cisterns, locally known as *fesguia/s*, are a defining attribute of the UNESCO World Heritage serial property, widely used in both private and communal settings to collect and store rainwater. Today, however, increasingly erratic and reduced rainfall means that many cisterns remain dry for extended periods or fail to reach functional capacity, weakening their role as essential community resources.

The impacts are both functional and material. Reduced recharge rates, combined with heightened evapotranspiration, accelerate soil salinization and structural deterioration, resulting in cracking and, in some cases, collapse (Fig. 1). The *Association Jlij Pour l'Environnement Marin* (AJEM), through its *Fesguietna* (Our Cistern) initiative, has documented the deteriorating condition of numerous cisterns across the island.[2]



Fig. 1: Deteriorated public rainwater cistern in Magmag, Djerba. Photo: Houda Ben Younes

Nevertheless, no comprehensive inventory currently exists of cisterns within the World Heritage property or of their precise state of conservation. Their progressive decline reflects not only the physical impacts of climate change, but also the erosion of a long-standing cultural practice rooted in ecological resilience and community-based water management.

Rising sea levels & Coastal erosion

Rising sea levels and accelerating coastal erosion pose severe and growing threats to Djerba's shoreline heritage. According to the UNDP Tunisia project *Addressing Climate Change Vulnerabilities Along the Tunisian Coast*, approximately 11% of the island's landmass is at risk of submersion under mid- to long-term sea-level rise scenarios.[3] This vulnerability is exacerbated by the island's geomorphology, which is largely characterized by fragile coastal environments, sandy spits, shallow lagoons, and low-lying rocky outcrops, highly susceptible to both gradual erosion and sudden coastal collapse.[4]

These processes have already affected several coastal mosques that historically formed the first line of defense within Djerba's system of mosques, a key attribute contributing to the Outstanding Universal Value of the UNESCO World Heritage serial property. Among the most critically impacted sites is the 14th-century Sidi Jmour mosque, located on a rocky coastal promontory, where prolonged marine exposure, salt spray, and wave action have caused advanced structural deterioration of both the underlying rock formation and the mosque itself (Fig. 2). This includes significant cracking in the elevated platform and retaining walls, ultimately prompting authorities to close the site to the public.[5]



Fig. 2: Erosion of the rocky coast surrounding the coastal mosque of Sidi Jmour.
Photo: Houda Ben Younes

Other mosques within the serial property, including Sidi Salem, Sidi Smaïn, Sidi Zekri, Guellala (Tamezguida), Sidi Yeti (Yati), and Imghar (Amghar) (see Fig. 5), face comparable risks, particularly foundation destabilization resulting from coastal undercutting, saline moisture infiltration, and accelerated material decay driven by wind-induced salt crystallization (Fig. 3).



Fig. 3: Deterioration of Amghar mosque in Ajim due to saline moisture and sea water intrusion.
Photo: Hatem Bousaid

These phenomena are not isolated but deeply interconnected with the island's socio-ecological systems and traditional lifeways. As climate impacts intensify, they threaten both the tangible and intangible dimensions of Djerba's World Heritage, underscoring the urgency for site-specific adaptation and mitigation strategies.

Human-induced threats: looting and unregulated practices

In addition to climate-related pressures, Djerba's World Heritage components face serious human-induced threats. Several Ibadite mosques included in the UNESCO World Heritage serial property of Djerba have become increasingly vulnerable to looting, vandalism, and illicit treasure hunting, often driven by persistent local legends alleging the presence of hidden riches within religious structures.[6]

Over the past two decades, repeated attacks have affected multiple mosques forming part of the serial property.[7] The Walhi mosque was vandalized in 2006 and again in 2020.[8] The Sidi Jmour mosque was targeted in 2010, resulting in the loss of significant architectural elements, while the semi-troglodyte Bardawi mosque was attacked in 2018 and subsequently restored in 2019.[9]

In 2024, a renewed wave of looting prompted a field mission by the National Institute of Heritage (INP), which documented the alarming condition of eight historic mosques, including Walhi (Fig. 4). The damage followed consistent patterns, with targeted excavation and dismantling of prayer halls, mihrabs, floors, domes, wells, cisterns, and carved stone elements. Many of the removed materials were trafficked and resold for commercial reuse. In response, the petition *Let's save the historic mosques of Djerba* was launched by Dr. Houda Ben Younes to raise public awareness and advocate for urgent protective measures.[10]



Fig. 4: Damage of Walhi mosque's *mihrab* and floor caused by treasure hunters.
Photo: Houda Ben Younes

Despite repeated warnings from INP and civil society actors, legal enforcement remains limited, leaving at least nine of the 22 mosques included in the serial property exposed to continued looting and degradation (Fig. 5.)

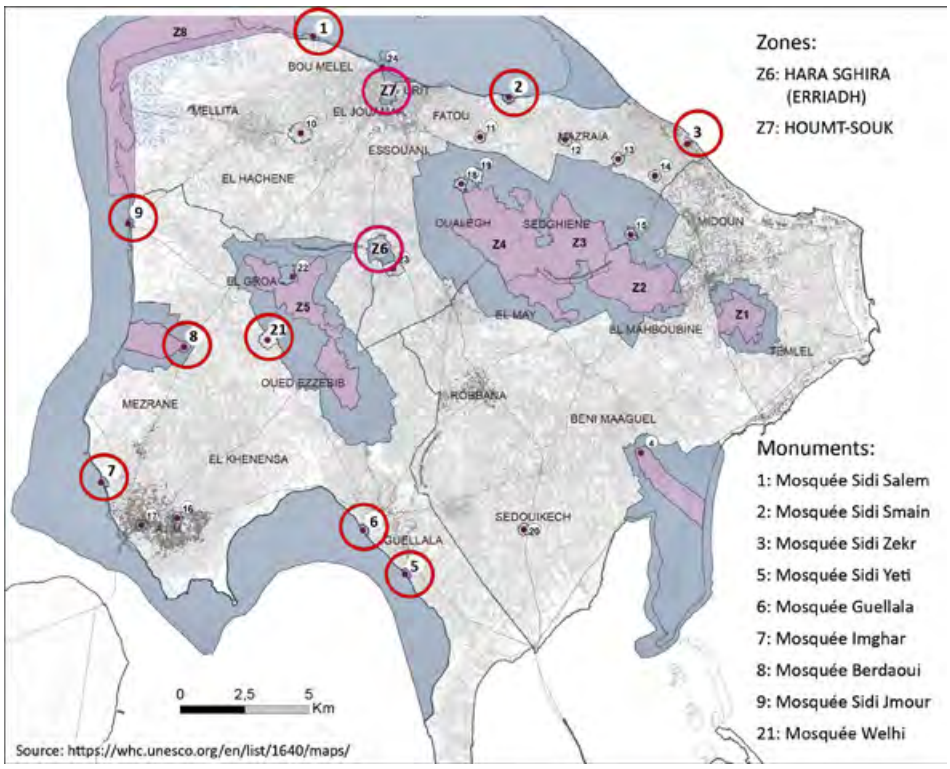


Fig. 5: The serial world heritage property, with core zones in violet and buffer zones in blue. Individual sites are numbered, and sites mentioned in this paper are marked by red circles. *Map: UNESCO*

In parallel, unregulated visitation practices pose additional risks to these fragile mosques. Visitors often climb onto roofs, sit on sensitive architectural elements, cook inside, or gather in large numbers, while no measures exist to manage or control access (Fig. 6). Such practices further weaken structures already vulnerable due to age, climate exposure, and past damage.



Fig. 6: The Sidi Yati mosque after restoration, UNESCO inscription, and the start of tourism development. *Photo: Nouri Boukhchim*

Management of the World Heritage Serial Property

A management plan was prepared during the 2022 nomination process, and a regional steering committee (COPIL) was established in 2023; however, implementation remains limited. This is mainly due to insufficient financial and human resources, compounded by the gradual decline of traditional maintenance and management systems.

The World Heritage serial property of Djerba covers extensive natural areas and is largely composed of private traditional dwellings (*menzel/s*), and agricultural lands such as olive groves. This configuration, combining large territorial coverage with fragmented private ownership, significantly increases the complexity of governance, protection, monitoring, and coordinated decision-making.

The ancient and abandoned *menzel/s* included within the serial property since 2023 have continued to deteriorate, with many of them partially or completely collapsing (Fig. 7).



Fig. 7: Aerial view of a severely deteriorated *menzel* in Sidghyan. *Photo: Hatem Bousaid*

Their associated agricultural lands are increasingly neglected because of the loss of traditional farming practices and the migration of property owners outside Djerba (Fig. 8). These trends are further aggravated by environmental pressures, particularly pollution and the impacts of urban development, which threaten both the natural and built components of the property.

In many cases, private owners choose to demolish traditional houses and replace them with new ones, as new construction is often less costly than restoration and more compatible with contemporary lifestyles (Fig. 9). Moreover, private vegetated and agricultural spaces surrounding traditional dwellings are rarely valorized, weakening landscape continuity and environmental resilience.



Fig. 8: Two *menzels* in Timlal with poorly maintained agricultural plots, sparse vegetation, and an abandoned well. *Photo: Hatem Bousaid*



Fig. 9: Aerial view of an abandoned *menzel* in Guechayyin and a newly-built house belonging to the same owner. *Photo: Hatem Bousaid*

In addition, a comprehensive inventory and condition assessment of these *Menzel/s* within the serial property has not yet been started. The same applies to the two historic urban centers: the old commercial center of Houmt Souk and the Jewish village of Hara Sghira, whose components have not been systematically inventoried, leaving their individual states of conservation largely unknown (Fig. 10). While efforts are underway to develop a *Plan de Sauvegarde et de Mise en Valeur* (PSMV) for the serial property, progress has been slow due to the significant financial investment and human resources required. Furthermore, greater attention is needed to integrate specific religious communities that manage some components of the serial property through their own governance and maintenance systems, ensuring better coordination within the overall management framework.



Fig. 10: Unoccupied synagogue in Hara Sghira managed by Jewish families now residing in Hara Kbira. *Photo: Hatem Bousaid*

Conclusion

Djerba's World Heritage inscription provides a strong foundation for safeguarding its Outstanding Universal Value. Strengthening coordination, implementation, and inclusive governance will support sustainable management, with local NGOs playing a key role in raising awareness and encouraging private owners to protect their properties, agricultural lands, and other heritage attributes. Greater focus on environmental awareness, particularly regarding climate change, combined with participatory approaches involving communities, religious leaders, youth, and civil society, can integrate local knowledge into decision-making. Developing adaptive, context-specific conservation strategies that consider climate risks and resource limitations will further enhance the long-term resilience of Djerba's World Heritage property.

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Inappropriate Interventions Continue at the Diyarbakır Fortress And Hevsel Gardens

Nevin Soyukaya, Diyarbakır Urban Conservation and Solidarity Platform

Below is a civil society organizations monitoring report prepared on the basis of the work carried out in Diyarbakır between 14–18 April 2026 by the Reactive Monitoring Mission jointly conducted by the UNESCO World Heritage Centre and ICOMOS for the "Diyarbakır Fortress and Hevsel Gardens Cultural Landscape," taking into account the topics included in the Diyarbakır work programme of the Reactive Monitoring Mission.

In addition, the report emphasizes that the issues addressed in the reports prepared by us in 2024–2025, as well as the practices threatening the Outstanding Universal Value and integrity of the site, have not only continued but have increased. The report has been prepared by the Diyarbakır Urban Conservation and Solidarity Platform / Cultural Heritage Protection Commission, composed of 84 civil society organizations.

Restoration Works on the Diyarbakır City Walls

In the restoration works carried out predominantly on the eastern sections of the fortress, it has been determined that the original fabric of the structure has not been respected in terms of materials, techniques, workmanship, and technical details. It has also been observed that implementation decisions were made rapidly and that the work was carried out in a careless manner. In addition, it was identified that the works were conducted without taking adequate protective measures for the surrounding environment. This situation indicates that the interventions have turned into low-quality applications resembling ordinary wall repairs, with superficial treatments and, in some areas, careless patchwork (Fig.s 1, 2).

Furthermore, it is evident that no visitor management plan has been implemented for the City Walls to date. The high volume of visitor circulation has led both to the deterioration of the walls and to the occurrence of fatal accidents. Measures such as the installation of railings have been introduced; however, these interventions do not conform to the original form of the structure. In addition, the functions assigned to certain towers adversely affect the visual integrity and authenticity of the fortress.

In this regard, it is necessary to develop a visitor management plan that prioritizes the conservation of the walls, along with a comprehensive functional planning approach. The removal of the coarse iron railings extending from the Inner Castle Walls (İçkale) and Tower No. 42 to Tower No. 39 which have drawn strong reactions from civil society organizations and the public, is also required (Fig.s 3, 4).



Fig. 1: Clumsy restoration of the city wall. Photo: Diyarbakır Platform



Fig. 2: Clumsy restoration of the Yenikapi. Photo: Diyarbakır Platform



Fig. 3: Railings built on the city walls. Photo: Diyarbakır Platform



Fig. 4: Inappropriate railing on the staircase leading up on the city walls. Photo: Diyarbakır Platform

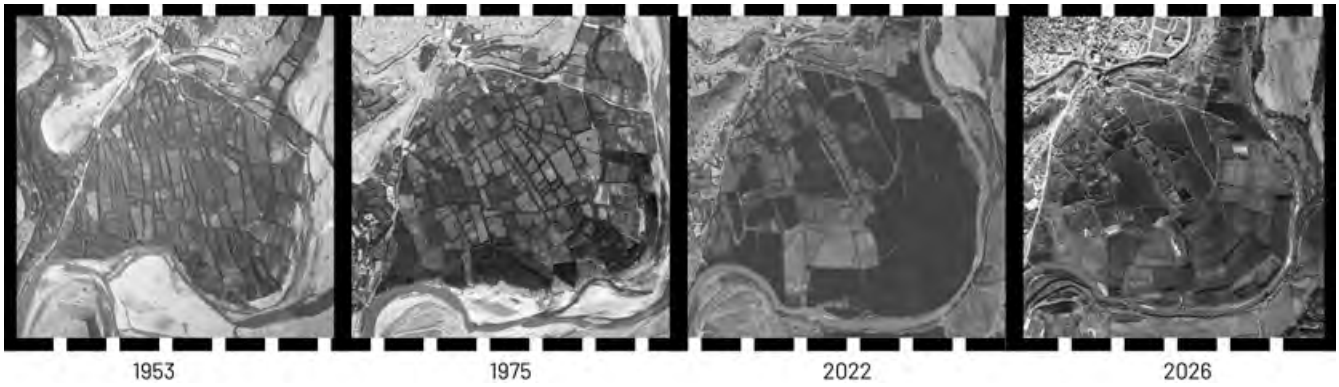


Fig. 5: Changes in the parcel structure of the Hevsel Gardens, 1953 - 2026. Photo: Diyarbakır Platform



Fig. 6: Large cornfields dominate now over the traditional family gardens. Photo: Diyarbakır Platform

Hevsel Gardens, the Tigris Valley, and the surroundings of the Ten-Eyed Bridge

1. Monopolization practices in the region that harm traditional agriculture and crop diversity, together with the spread of industrial agricultural practices, form the basis of serious problems (Fig.s 5, 6)

   The conflict that took place in 2015, the process of urban destruction, and the forced displacement of residents from Surici have also negatively affected the Hevsel Gardens. The agricultural workforce in the Hevsel Gardens had largely been supplied by residents of the neighborhoods in Surici that were destroyed after the conflict, as well as from the Ben u Sen neighbourhood. During the 2015 conflict process, residents of the Surici neighbourhoods were first subjected to forced displacement. Subsequently, parts of the Ben u Sen neighbourhood particularly those close to the city walls and Hevsel were depopulated as a result of urban transformation interventions.

   As a consequence, market gardeners (bostancıs) faced serious difficulties in finding labor to work in the market gardens. This led to a rapid transformation in agricultural production. The market gardens, which for centuries had been enclosed by mulberry trees and other fruit trees characteristic of Hevsel, were purchased or leased by one or two individuals. The historic fruit trees that defined these market gardens were cut down, and large-scale parcels were created where industrial agriculture began to be practiced. In these areas-primarily cultivated with corn and cotton—intensive use of agricultural chemicals has been observed.

   While this situation has led to monopolization in agriculture, it has also caused significant harm to agricultural practices that have continued for thousands of years. The emergence of monopolization driven by changes in land ownership in the region not only weakens traditional crop diversity but also leads to deep-rooted structural problems. Furthermore,

in response to demands from those engaged in industrial agriculture, new roads have been opened within the Hevsel Gardens to facilitate the transportation of products by heavy trucks, and some existing roads have been widened.

Wide roads for cars and agricultural vehicles have been opened in the Hevsel Gardens, which have never been there before.

2. Irrigation constitutes one of the fundamental problems of the Hevsel Gardens. The cultivation of crops such as corn and cotton increases water demand in the area, leading market garden owners to rely more heavily on the use of wastewater. The use of wastewater, in turn, causes contamination of both the soil and groundwater.
3. There is significant development pressure within the area. The spread of construction associated with functions such as cafés and restaurants — particularly within the Hevsel Gardens, along the banks of the Tigris River, and especially around the Ten-Eyed Bridge — creates major problems. In addition, there is the presence of excavation debris, waste, and similar materials. This situation not only harms traditional agricultural practices but also leads to environmental pollution, contamination of water and soil, visual pollution, and excessive human circulation (Fig. 7)
4. Furthermore, farmers engaged in traditional production in the Hevsel Gardens face challenges related to organization and market access, which makes the continuation of traditional practices increasingly difficult. It is necessary to provide technical and financial support to these farmers and to encourage their organization.



Fig. 7: Illegally built structures in te Hevsel Gardens operate as cafés.
Photo: Diyarbakır Platform

Projects implemented or planned within the World Heritage Site and Buffer Zone

Anzele Urban Design Project

The Anzele water source is one of the components of the World Heritage site. As one of the ancient water sources of the city, it also constitutes an important part of Diyarbakır's socio-cultural life. The proposed design project envisions demolishing a significant portion of the neighbourhood in which the water source is located, opening up its surroundings, and transforming it into a modern recreational park area. This approach reflects an ill-conceived, unnecessary, and misguided vision that lacks adequate consideration.

Throughout history, the Anzele water source, together with the historic tannery structure associated with it and the Ayn Zulal Church mentioned in written sources, has coexisted with and shaped the surrounding neighbourhood. The demolition of numerous streets surrounding the water source to create open space represents a large-scale intervention that would alter the original urban layout and lead to the depopulation of the area.

Following the 2015 conflict, the projects and interventions implemented and ongoing in Surici have already been transforming the historic city from a living urban space into a commercial and touristic zone, thereby eroding its urban character. If this flawed approach is implemented, it will inflict further damage on the authenticity of Surici.

Restoration Works of Civil Architecture in the Demolished Neighborhoods

Erroneous restoration interventions applied to registered (listed) structures have distanced these buildings from their original values. Not only have spatial dimensions been altered, but architectural elements such as windows, pools, *gezemek* (semi-open circulation spaces), hearths, and staircases have also been modified in terms of their original dimensions and forms, resulting in a loss of quality.

Traditional Diyarbakır houses have either been rebuilt or completed in a haphazard and careless manner due to interventions that have strayed from their original character. Some of the registered examples of civil architecture have been rebuilt in accordance with the Conservation-Oriented Development Plan adopted in 2018. Unfortunately, these projects were carried out in a manner that differed from the original lot dimensions and extended beyond the original street boundaries. In areas where viable solutions could not be developed, walls with undefined boundaries were constructed.

At the intersections of some streets, small open squares have been created by disrupting the integrity of the original building volumes; certain elements of the houses, such as kitchens, have been incorporated into the street. These practices, which demonstrate a lack of respect for cultural heritage and violate conservation principles, cause serious harm to the urban identity when combined with the construction of clusters of low-quality reinforced concrete buildings in the area (Fig.s 8, 9).

Fundamental structural problems

1. The Tigris River originates within the boundaries of Diyarbakır and is a transboundary river. However, the section extending



Fig. 8: "Restoration" in Surici, 2022. Photo: Diyarbakır Platform

from its source, passing through the World Heritage Site, and continuing to the Bismil district in the southeast of Diyarbakır has not been legally designated as a "river." Since the segment within the World Heritage site is not formally defined as a river, coastal protection legislation is not applied in this area. This situation constitutes a fundamental problem for the protection of the natural character of the riverbed and its surroundings.

Granting legal "river" status to the stretch of the Tigris from its source to Bismil is therefore of critical importance. Similarly, the ambiguity surrounding the legal protection status of the Hevsel Gardens also hinders the implementation of effective conservation measures.

2. The Surici area, which constitutes the historic urban center of Diyarbakır, was declared a "Risk Area" in 2010, and based on this designation, a decision for "Urban Transformation" was adopted. However, the area in question is a registered historic site with a history spanning thousands of years and also forms the buffer zone of the World Heritage site. At the same time, it constitutes the very basis for the existence of the Diyarbakır Fortress and Hevsel Gardens.

The designation of the entire area as a "Risk Area" and its subjection to "Urban Transformation" decisions have created the legal basis for the implementation of interventions within this framework. Accordingly, six neighborhoods in Surici where conflicts took place, as well as the Alipaşa and Lalebey neighborhoods where no conflict occurred, were completely demolished and rebuilt under these decisions.

As a result, the integrity of Surici as a historic urban site has been disrupted, and the OUV of the World Heritage site has been adversely affected. Since the aforementioned decisions remain in force, the risk of urban transformation continues for the remaining parts of Surici. Indeed, both the interventions implemented to date and the Conservation-Oriented Development Plan approved in 2018 indicate that this transformation continue to be pursued.

Through piecemeal projects such as the Anzele Urban Design Project, it is evident that there is an ongoing intention to transform the remaining parts of the area as well. For these reasons, it is necessary to annul the decisions declaring Surici a "Risk Area" and subjecting it to "Urban Transformation." This would eliminate potential future risks.



Fig. 9: "Restoration" in Surici, 2022. Photo: Diyarbakır Platform

The Iraqi Marshes Between Drought and Oil Extraction: An Independent

Save the Tigris

We address you as Save the Tigris, a coalition of Iraqi and international civil society organizations dedicated to protecting the World Heritage Property "The Ahwar of Southern Iraq: Refuge of Biodiversity and the Relict Landscape of the Mesopotamian Cities" Since its inscription on the World Heritage List in 2016, our organization has been continuously monitoring the conservation status and the environmental and social challenges facing both the natural and cultural components of the property.

The marshes of southern Iraq, particularly the Hammar and Hawizeh marshes, have witnessed rapid environmental and social degradation in recent years due to a number of factors, most notably persistent drought, poor water resource management practices, and the expansion of oil extraction activities within, or adjacent to, the areas of the natural components of the World Heritage site.

This report, based on field testimonies from local residents and official documentation from Iraqi government institutions, concludes that aforementioned factors pose a genuine threat to the integrity of the site and its Outstanding Universal Value, requiring an urgent and comprehensive response.

Local communities in the marshes rely on traditional activities directly linked to water, such as fishing, buffalo herding, and reed harvesting. Historically, hydrological stability has been essential for the sustainability of these livelihoods. Any disruption to this balance immediately impacts the lives of the inhabitants and the ecosystem as a whole.



Fig. 1: Hawizeh Marshes. Continuing drought renders livelihoods in the Ahwar of Iraq unsustainable. Photo: Murtadha Aljunubi, 2026

We have assessed the State of Conservation report by the State Party published in January 2025, submitted in response to World Heritage Committee decision (46 COM 7B.Add4), which outlines a range of institutional and technical measures taken to safeguard the Outstanding Universal Value (OUV) of the property. We also take note of Decision 47COM 7B.61 of the World Heritage Committee at its forty-seventh session (2025), which commended some progress made, while expressing grave concern about the continuing water scarcity and reports from third parties regarding potential oil extraction within or adjacent to the Hawizeh Marshes component.

The State party's report explained that the Government of Iraq had taken measures to ensure that a minimum of water releases for the four natural components (Hawizeh Marshes, the Central Marshes, and the eastern and western Hammar Marshes) is made available, in addition to updating the Strategy for Water Land Resources in Iraq (SWLRI) and strengthening regional cooperation with upstream countries.

At the same time, the World Heritage Committee decision (47 COM) notes the continued water scarcity for the fifth consecutive year and emphasizes that the failure to guarantee sufficient water flows could pose a real threat to the OUV of the property. Independent media reports during 2024–2025 indicate that water levels in the Hawizeh Marshes have remained below the required minimum for extended periods, with declining water quality and increasing salinity, which has directly impacted the livelihoods of local communities. Therefore, we believe there is a need for greater transparency and accuracy in the available hydrological data supplied by the State Party. We would like to request that the State Party's commitments should be linked to verifiable quantitative indicators which should be submitted to the World Heritage Centre on a regular basis.

The State Party's report affirmed Iraq's commitment to not permit any oil activities within the property boundaries, subjecting projects in adjacent areas to environmental impact assessments, establishing joint committees of the Ministry of Water Resources

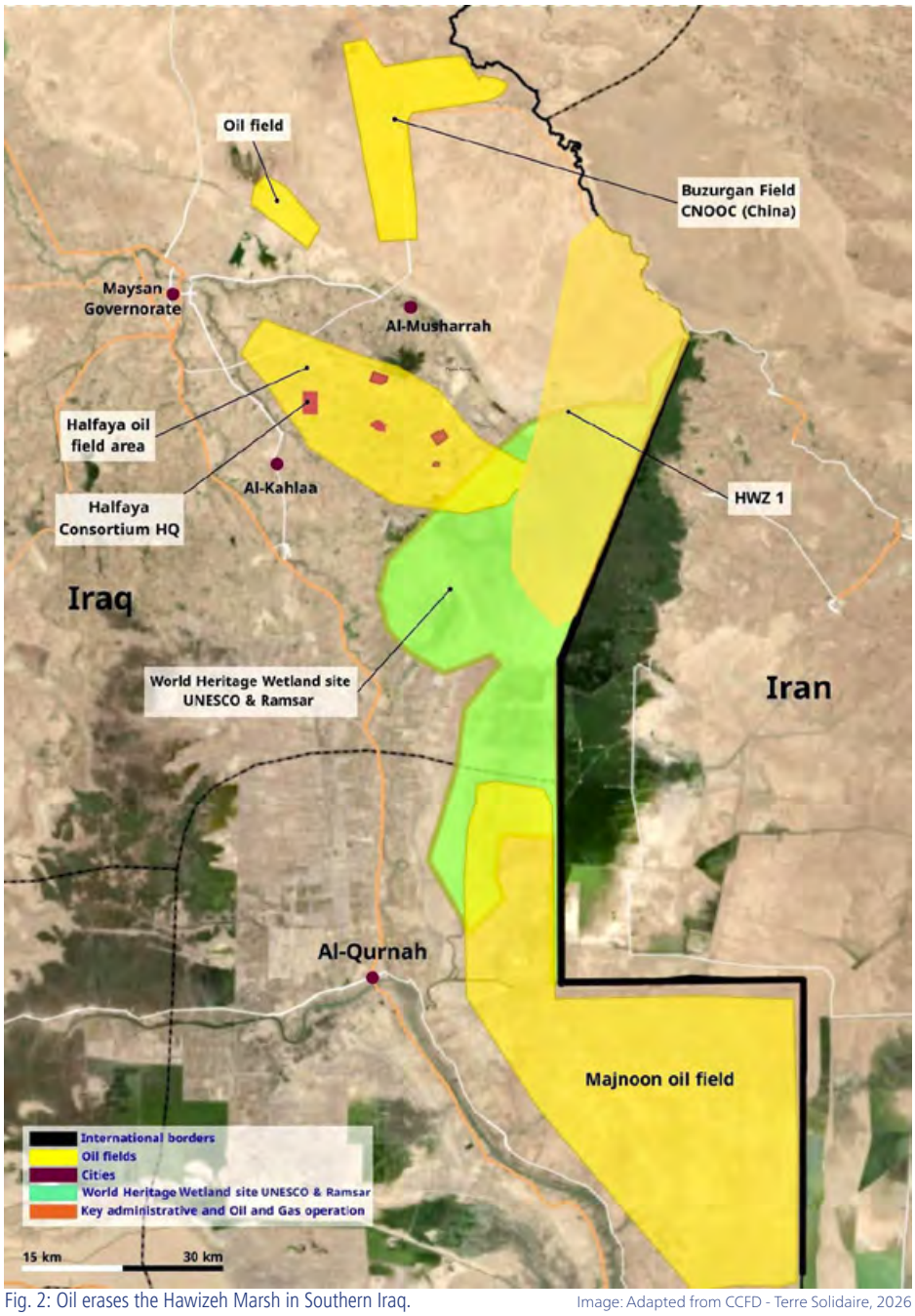


Fig. 2: Oil erases the Hawizeh Marsh in Southern Iraq. Image: Adapted from CCFD - Terre Solidaire, 2026

facilities, thereby contributing to the desiccation of the marsh areas. Then in 2023, the Chinese company Geo-Jade Petroleum started operations in Hawizeh marshes after having been awarded concession for the development of the Hawizeh 1 (HWZ 1) field, located south of Halfaya, in the heart of the protected wetlands. The oil extraction area overlaps the protected area by 300 km².

According to documentation by local organizations and media reports published in late 2024 and early 2025, seismic survey equipment and utility road construction were observed in areas within the Hawizeh Marshes, which had experienced extensive drought in recent years. Indeed, official documents issued in March 2025 by the Iraqi Marshes and Wetlands Restoration Center of the Ministry of Water Resources indicate that the Oil Exploration Company submitted a formal request to facilitate the entry of engineering equipment and the opening of pathways within the Hawizeh Marshes, within the core zone of the World Heritage property. Correspondence from the Oil Exploration Company indicates its intention to open pathways up to 10 meters wide to facilitate the movement of heavy equipment, which constitutes direct physical interference with the marsh's natural fabric.

with the Ministry of Oil, and reiterated that no oil exploration or exploitation is permitted within the property, and outside the boundaries only if there is no risk.

However, following third party reports of potential oil exploration in the Huwaizah marshes component of the property, on 16 May 2025, the World Heritage Centre requested a detailed response from the State Party in line with paragraphs 172 and 174 of the Operational Guidelines.

In 2010 the oil field of Halfaya, adjacent to Hawizeh Marshes, was awarded for exploitation to PetroChina, Total Energies and Petronas. Since then, oil installations are located less than 2.5 km from the nearest wetlands of Hawizeh. Two stations pump enormous quantities of fresh water every day for use in industrial

Satellite images from November 2025 captured by Terre Solidaire confirm ongoing activity in the central zone of this protected site such as seismic prospecting and geological reconnaissance operations. An Environmental Impact Assessment (EIA) has not been released, even though the Ministry of Oil reports having completed such a study for oil extraction in the Hawizeh marshes. It is not clear what the scope was of this study, nor if a specific assessment was conducted of the impacts on the natural heritage site, nor whether relevant international bodies were notified. In any case, the fragility of the marshland ecosystem means that these activities would have a devastating impact on the OUV of the Hawizeh marshes.

Extensive field testimonies from local residents in the vicinity of the Hawizeh marshes indicate that the drought that has affected

the region since 2021 was not merely a seasonal phenomenon, but rather linked to tangible changes in water flow management. These changes included opening regulators and depleting water reserves following the 2019 floods, in addition to reducing water releases into the marshes. This coincided with a near-complete cessation of water flow from the Karkheh River in Iran, a tributary of the Tigris River. The result has been widespread drought, the collapse of traditional livelihoods, and the displacement of large parts of the population. When Geo-Jade Petroleum started its operations in the marshes, further raised community concerns were raised about the impact of extraction activities on the natural heritage of the property. The previous changes in water flow management were then regarded by local population as a means to prepare for upcoming oil licensing of the area.

Meanwhile, the Iraqi Ministry of Agriculture has formed committees to assess drought damage and compensate owners of livestock losses in the property. This reflects an institutional acknowledgment of a widespread crisis. However, these committees have acknowledged significant difficulties in collecting accurate and comprehensive data from the Hawizeh marshes, preventing the development of damage estimates or effective compensation mechanisms.



Fig. 3: A buffalo sank in the mud before he could reach water to drink.
Photo: Murtadha Aljunubi, 2025



Fig. 4: Drinking troughs had to be built for livestock, and water brought from outside, due to the lack of natural water in the marshes. Photo: Murtadha Aljunubi, 2025

Local residents have also expressed concern regarding the State Party's possible intentions to re-examine or redraw the boundaries of the Hawizeh marshes, which could lead to a reduction in the area designated as a World Heritage Site. This possibility is considered a highly sensitive issue, given its potential direct impact on the site's integrity.

Save the Tigris contacted the Ministry of Water Resources in 2025 to inquire about the oil developments in Hawizeh Marshes. Our aim was to obtain official clarifications. However, we did not receive any response.

We believe it is essential that the State Party:

- Establishes an immediate ban on all oil-related activities in and around the Hawizeh Marshes;
- Withdraw licenses to develop oil extraction in the Hawizeh Marshes;
- Restore the marsh areas affected by desiccation and oil projects;
- Publishes an updated official map accurately showing the locations of oil extraction activities in relation to the property boundaries and buffer zones;
- Share the results of Environmental Impact Assessment (EIA/SEA) studies if oil extraction activities with the World Heritage Centre and its advisory bodies before proceeding with any implementation decisions, as explicitly requested by the Committee;

We appreciate the State Party's community engagement, capacity building, combating illegal fishing, and supporting traditional livelihoods. However, consistent testimonies from marshland residents indicate a growing sense of concern about declining water resources, changing land-use patterns, and weak communication from government stakeholders regarding extraction activities in the area. We would like to request the State Party to provide enhanced transparency and disclosure, based on data.

To the WHC we would like to request:

- To request immediately the invitsatia monitoring mission to the site. The World Heritage Centre recommended a monitoring mission to be undertaken in 2027, but we urge this mission to take place earlier given the urgency of the threat.
- Possibly inscribe the site on the World Heritage in Danger List.
- To urge the State Party of Iraq to maintain the boundaries of the site.

Resisting Tourism: Subak Discontent in Bali's Cultural Landscape

Wiwik Dharmiasih, Universitas Udayana, University of Hawai'i at Mānoa, and Dala Institut Wayan Subawa, Farmer in Jatiluwih
I Gede Yudha Bhismaya, Photovoices International
Yefta Sutrisno, Government Rice Aid Programs in Bali and West Nusa Tenggara Province



Fig. 1: Iron sheets protest. *Photo: W. Subawa*

In late 2025, a sudden enforcement of spatial planning regulations at the UNESCO Cultural Landscape of Bali Province forced small-scale, farmer-owned businesses to close, sparking a wave of grassroots protest. These farmers erected corrugated iron sheets in their rice fields to disrupt the views at the most popular viewing sites of the subak landscape, signaling their discontent with what they describe as selective enforcement alongside larger tourism destination facilities and investments.

The designation of the Subak as the main feature of the UNESCO Cultural Landscape has created a growing rift between state-led tourism agendas and the livelihoods of local farmers and water resource managers. While the government continues to implement mass-market tourism attractions, like festivals and high-end infrastructure, farmers remain marginalized from the growing revenue streams from World Heritage destination tourism. This economic exclusion, combined with rigid land-use restrictions favor large-scale developers over smallholders. As a result, the main visitation location at Jatiluwih has transformed into a site of active conflict over resource distribution and management authority.

We have been reporting on the Cultural Landscape of Bali Province (CLBP) with World Heritage Watch since 2015. This group of authors represents various stakeholders, including individuals involved in the original UNESCO nomination process, youth and local interest groups, and local farmers and landowners who continue to farm within the core zone. Our perspective is rooted in the daily reality of these water irrigation management associations (the subak), and we aim to provide an account of the site that reflects the lived experience of those that have served as its stewards for generations.

Status of the Site

The "Outstanding Universal Value" (OUV) of the Cultural Landscape of Bali Province was nominated not merely as a physical landscape, but for the broader *Tri Hita Karana* philosophy that local land relations represent. This place-based philosophy mediates the harmony between humans, the environment, and the spiritual world. The subak is described as the physical manifestation of this harmony. Its loss, and the significant transformations it is undergoing thus represents the deeper changes unfolding in Balinese society. The 2012 designation intended to safeguard subak landscapes due to various drivers. Rapid urbanization and tourism development result in a consistent loss of approximately 1,000 hectares of rice land every year. Today, subak members express compounding agricultural hardships: declining water quality, a labor crisis from younger generations migrating for urban work, rising production costs, and stagnating farm-gate prices. All of these pressures occur alongside increasingly volatile weather patterns and climate change that disrupt traditional cultivation cycles.



Fig. 2: Development restricted sign, with construction. Photo: I.W. Sukamerta

Selective enforcement and the "leapfrog" phenomenon

Recent interventions by the Special Committee (*Panitia Khusus,* or Pansus for short) on Spatial Planning, Assets, and Licensing (TRAP) have highlighted a significant double standard. In early December 2025, authorities ordered the closure of 13 local farmer-owned stalls and restaurant businesses in Subak Jatiluwih, citing violations of Regional Regulation (Perda) No. 3 of 2023 regarding Sustainable Food Agricultural Land (LP2B).

However, these closures became contentious when farmers observed that only small, local establishments were being targeted. One farmer, who had been summoned by police for building a small food stall, questioned the logic of government enforcement: *"I only wanted to get a small share of the tourism 'cake' since local authorities were seen as not truly enforcing construction bans."*

Farmers noted that while they are threatened for building huts in their field to hawk cold drinks, snacks, and farm products, large-scale restaurants along the Jatiluwih road continue to violate the green zone policy. These larger restaurants have invested in sizable investments since designation, at times at the expense, and conversion of rice fields. Local farmers famously describe the "no-building" signs in these zones as being *"like frogs—always moving to a new spot whenever there's new construction."* This disparity is further evidenced by the allocation of 500 million rupiah in tourism area (DTW) funds to create a trekking path for a restaurant with a helipad, while the main village road, which collapsed in late 2025, remains unfixed despite promises of a much-needed bridge project crucial for farm access.

The "Subak Spirit" Festival

The institutional shift toward extractive tourism reached a breaking point during the 2025 "Subak Spirit Festival." As detailed in our 2025 report, the government-supported an event that triggered an overwhelming influx of visitors, including a surge of 1,500 domestic tourists per day and an overall crowd of 45,000 in the Jatiluwih core zone.

Rather than empowering the farmers, the festival showed how selective interpretation deepens marginalization. Despite the event being centered on subak symbols, the actual water management associations were excluded from the planning process. Farmers reported that they were only contacted when their fields were needed as staging areas. Most disturbingly, several farmers were forced to harvest their rice while the paddies were still unripe, a direct violation of agricultural and spiritual practice, simply to make room for performance stages. This commodification of the landscape demonstrates that the "Subak Spirit" promoted by the state is one where the farmer is a backdrop of the visual landscape rather than the steward of the living landscape.

Spiritual neglect and the eroding trust

Beyond impacts to local authority and livelihoods, these institutional failures also extend to the *niskala* (spiritual) realm. In Tempek Kedamian, for example, a landowner allowed his land to be excavated for a temporary road after being promised a *pecaruan panca sanak* (purification ceremony) and development of a small shrine. These promises remain unfulfilled and the landowner has since suffered chronic illness which, according to local balian (healers), is caused by disturbances and lack of respect for the lack of purification practices rooted in core practices of caring for the land.

The daily reality for farmers involves managing these negative externalities of tourism and economic development with little support for making things right. Tourists frequently pick rice and trample crops, and some have even been observed urinating near shrines (*pelinggih*). Local custom believes that such practices require ritual correction. With no official intervention from formal authorities, farmers have taken things into their own hands. They are increasingly constructing bamboo fences for protection to keep visitors out of their fields and sacred areas.

After growing discontent, a meeting with the Tabanan Regent was convened on July 5th, 2025. At this meeting farmers who attended said they were *"pressured legally"* to remove their protest barricades. One local observer noted: *"Why is the Tabanan regent only speaking up now? If from the beginning they had supported the preservation of the subak system and prioritized farmers' welfare then we could have tried to anticipate and respond to these problems... Now, whatever the regent says won't belistened to."*

Conclusion: Emboldened resistance

The construction of the corrugated iron sheet barricades at Telabah Gede are more than an isolated protest. They have grown out of a decade of eroding trust. These incidents are becoming increasingly emboldened because farmers feel they have lost all agency within the UNESCO system that was designated to protect them from growing external pressures. Without immediate intervention and reshaping the terms of participation and ownership over decisions governing the site, these localized acts of defiance are likely to grow. The future of the subak depends on whether its stewards are treated as active managers of a living landscape rather than just serving as the photographic backdrop and playground for an extractive industry.

Recommendations to UNESCO and the State Party

Independent Audit of DTW Funds: Establish a transparent, publicly accessible audit to ensure a fair percentage of tourism revenue directly supports *subak* maintenance and farmer welfare.

Equitable Spatial Enforcement: End the "moving frog" phenomenon by applying green-zone regulations with the same rigor to large-scale developers as to local smallholders.

Cessation of Legal Harassment: Halt the use of police summons and legal intimidation against farmers who are attempting to secure a livelihood.

Support Rituals Rooted in Local Sacredness of the Site: Immediately fulfill promised purification ceremonies and infrastructure repairs in areas like Tempek Kedamaian.

Support Subak Infrastructure: Prioritize farmer-driven infrastructure development with the same if not greater priority than tourism infrastructure development

Farmer-Led Management: Formalize a process where subak associations have veto power over festivals and tourism initiatives that disrupt agricultural cycles or sacred spaces.

IV. Properties of Relevance for Indigenous Peoples

The Grand Canyon's Waters and Lands are Under Threat

Jen Pelz, Amanda Podmore, and Amber Reimondo, Grand Canyon Trust



Fig. 1: Over millions of years, the Colorado river has carved the its way through the Colorado Plateau, creating the Grand Canyon.
Photo: Amanda Podmore / Grand Canyon Trust

Long considered protected by nature of it being both a national park and a UNESCO World Heritage Site (designated in 1979), the Grand Canyon is surprisingly threatened. From nearby uranium mining to declining flows of the Colorado River, its waters, lands, and air need continued vigilance for the sake of the landscape and the communities that depend on it. This paper details two current threats to the health and integrity of the Grand Canyon: ongoing uranium mining near the rim and a dwindling Colorado River flows in the canyon.

Uranium mining threatens the Grand Canyon

The Grand Canyon region has a long history of uranium mining that continues today. Indigenous peoples in the region have been disproportionately impacted by a legacy of uranium mining and milling that started in the 1950s. As one example, there are over 500 abandoned uranium mines across Navajo Nation that have not been remediated.

For decades, the leaders of the Havasupai Tribe who live inside the Grand Canyon have sought protection for their water and people from uranium mining near Grand Canyon National Park. In 2023, President Joseph R. Biden designated the Baaj Nwaavjo I'tah Kukveni – Ancestral Footprints of Grand Canyon National Monument on federally managed lands surrounding Grand Canyon National Park. This action to protect just under one million acres of culturally significant lands also created a path for co-stewardship for 13 Tribes (Havasupai Tribe, Hopi Tribe, Hualapai Tribe, Kaibab Band of Paiute Indians, Las Vegas Paiute Tribe, Moapa Band of Paiutes, Paiute Indian Tribe of Utah, Navajo Nation, San Juan Southern Paiute Tribe, Yavapai-Apache Nation, Pueblo of Zuni and the Colorado River Indian Tribes) and further cemented an existing mineral withdrawal that prohibits new mines.

Two mines are exempt from the Baaj Nwaavjo I'tah Kukveni proclamation and an underlying mineral withdrawal: the Pinyon Plain Mine (formerly Canyon Mine) and one other that was not specified by the Biden Administration, but could be the Arizona One Mine that has been on standby since 2014 and was said by the mining company to be mined out. The Pinyon Plain Mine is actively mining a small amount of high-grade uranium ore just 9 miles from the south rim of the Grand Canyon. Over the short life of the mine, the company expects to produce about 2.5 million pounds of yellowcake (also known as uranium oxide, this is the portion of uranium ore that eventually becomes nuclear fuel). Meanwhile, the U.S. nuclear fleet has used an average of 46.5 million pounds of yellowcake equivalent every year over the past decade. The amount of uranium being mined from the Grand Canyon is a drop in the bucket

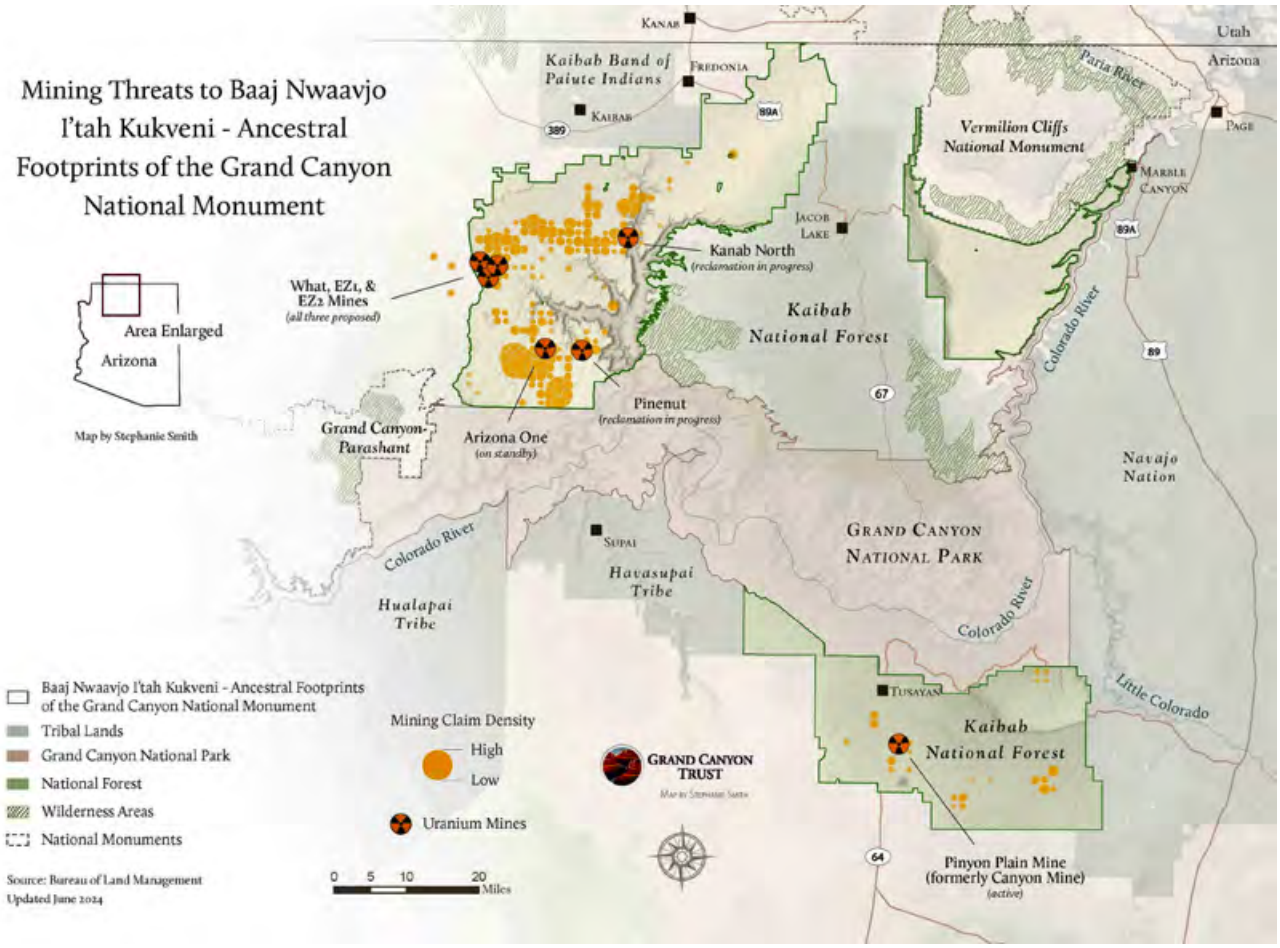


Fig. 2: Uranium mining in the vicinity of the Grand Canyon National Park. Map: Stephanie Smith / Grand Canyon Trust

compared to the United States' needs – and yet its environmental and health toll could be significant.

The Pinyon Plain mine shaft punctured a perched aquifer in 2016 and since then, more than 80 million gallons of groundwater have been pumped from the mine shaft to a lined surface impoundment to be evaporated. This water contains levels of arsenic, lead, and uranium that exceed the U.S. Environmental Protection Agency's standards, which is relevant because it will require monitoring and management even after the mine closes to ensure groundwater isn't polluted. The biggest concern is that even if groundwater pollution can be detected, according to hydrologists, it's unlikely to be cleaned up in this complex hydrologic environment. Given the many faultlines in the geologic layers of the Grand Canyon, increased mining elevates the risk that these contaminants will move vertically and horizontally via faultlines and other pathways into aquifers and/or seeps and springs. In a peer-reviewed paper in the Annual Review of Earth and Planetary Sciences, authored analyzed recent groundwater studies and concluded that: "the protection of spring ecosystems and tribal water sources and sacred sites requires cessation of all uranium mining activities at Pinyon Plain Mine…"[1] In particular, studies show that contamination from uranium mining could reach springs in Grand Canyon National Park and Havasu Creek– the primary water source for the Havasupai people in Supai Village–in tens to hundreds of years.

Another publication coauthored by Carletta Tilousi (Havasupai) and the United States Geological Survey expanded the traditional risk framework for uranium mining contamination to include traditional Indigenous ways of knowing, recognizing that the Havasupai people have expanded pathways of contamination exposure from mining, including via hunting, ceremony, and medicines.[2]

1 Crossey, L. J., Karlstrom, K. E., Curry, B., McGibbon, C., Reed, C., Wilgus, J., Whyte, C. J., & Darrah, T. (2024). Hydrotectonics of Grand Canyon Groundwater. Annual Review of Earth and Planetary Sciences, 52(Volume 52, 2024), 521-547. https://doi.org/10.1146/annurev-earth-080723-083513

2 Tilousi, C., and Hinck, J.E., 2024, Expanded conceptual risk framework for uranium mining in Grand Canyon watershed—Inclusion of the Havasupai Tribe perspective (ver. 1.1, February 2024): U.S. Geological Survey Open-File Report 2023–1092, 25 p., https://doi.org/10.3133/ofr20231092.

Science has come a long way since the Pinyon Plain mine's environmental review was completed in 1986. The forty-year old review does not accurately analyze the risks to the Grand Canyon's waters and peoples. Now, increased interest for more nuclear energy in the United States, paired with administrative policies and pressure for more domestic uranium, are putting a spotlight on the Grand Canyon region. Since 2016, the price of uranium has steadily risen to around $85 USD per pound. The current administration declared an energy emergency in 2025 that prioritizes conventional energy sources like nuclear generation and set a goal of quadrupling U.S. nuclear generation capacity by 2050. Policies like this lead to special treatment for extraction projects at the expense of local communities and only add pressure to land protections like Baaj Nwaavjo I'tah Kukveni National Monument. In 2025, it was leaked that the administration plans to "right-size" national monuments, and Baaj Nwaavjo I'tah Kukveni National Monument was one of six monuments listed for review. Since then, administration officials have denied that monument resizing is a priority, but uncertainty for the future of this critical and widely popular monument remains.

Colorado river flows in Grand Canyon are in peril

The mighty Colorado River, named after its traditionally sediment-rich red color, flows 1,450 miles (2,330 km) from the Wind River range in Wyoming to Mexico, providing water to 40 million people in seven states, two nations, and 30 tribes. The river wends 277 miles through Grand Canyon National Park, where it is fed by additional seeps and springs. Decades of overuse from the southwest United States' water storage reservoirs paired with dwindling river flows due to climate change has led to a significant water supply-demand imbalance. In 2000, Lake Powell, the reservoir that feeds water into the Grand Canyon, was full. Since the start of the century, water levels in the Lake Powell reservoir have declined significantly. As of May 2026, the reservoir is at 23% capacity[3] and projected to reach "power pool" – the reservoir level at which the dam can no longer generate hydropower – as soon as July 2026.

The Millenium Drought plaguing the Southwest since 2002 has tipped the Colorado River into existential crisis, and the Grand Canyon is at the heart of the management predicament. Glen Canyon Dam, just upstream of the Grand Canyon, is the demarcation between the two main user groups of the Colorado River: the Upper Basin States (Colorado, New Mexico, Utah, and Wyoming) and the Lower Basin States (Arizona, California, and Nevada). How much water and when is delivered downstream through the dam determines the health of the river ecosystem in Grand Canyon National Park.

Currently, the federal government is developing new rules to govern how water is shared between the Upper Basin and Lower Basin states – which will have serious implications for when and how much water flows through the Grand Canyon. Current guidelines expire at the end of 2026, which is why the U.S. Bureau of Reclamation is conducting an environmental review outlining different alternatives to manage water deliveries through Glen Canyon Dam post-2026. We expect these new rules will be finalized in the fall.

In addition to these new guidelines, we are deeply concerned about two other significant challenges in delivering water downstream through Glen Canyon into the Grand Canyon. The first is ensuring that water can get through the dam as water levels drop near or below the outlets. The second is maintaining native fish populations in the Grand Canyon by preventing nonnative, predatory fish from passing through the dam and establishing permanently in the canyon below.

Glen Canyon Dam infrastructure Modification is Needed

Glen Canyon Dam was not built to weather significant drought and aridification. The design of the dam makes it impossible to generate hydropower below elevation 3,490 feet and no outlets exist below elevation 3,370 (also known as "dead pool")

3 https://lakepowell.water-data.com/ (May 8, 2026)



Fig. 3: The Colorado watershed area (the Colorado Basin) consists of an Upper and a Lower part, divided by the Glen Canyon Dam. The Grand Canyon National Park WHS covers most of the river's stretch in the Lower Basin almost down to the back end of Lake Mead. Map: Stephanie Smith / Grand Canyon Trust

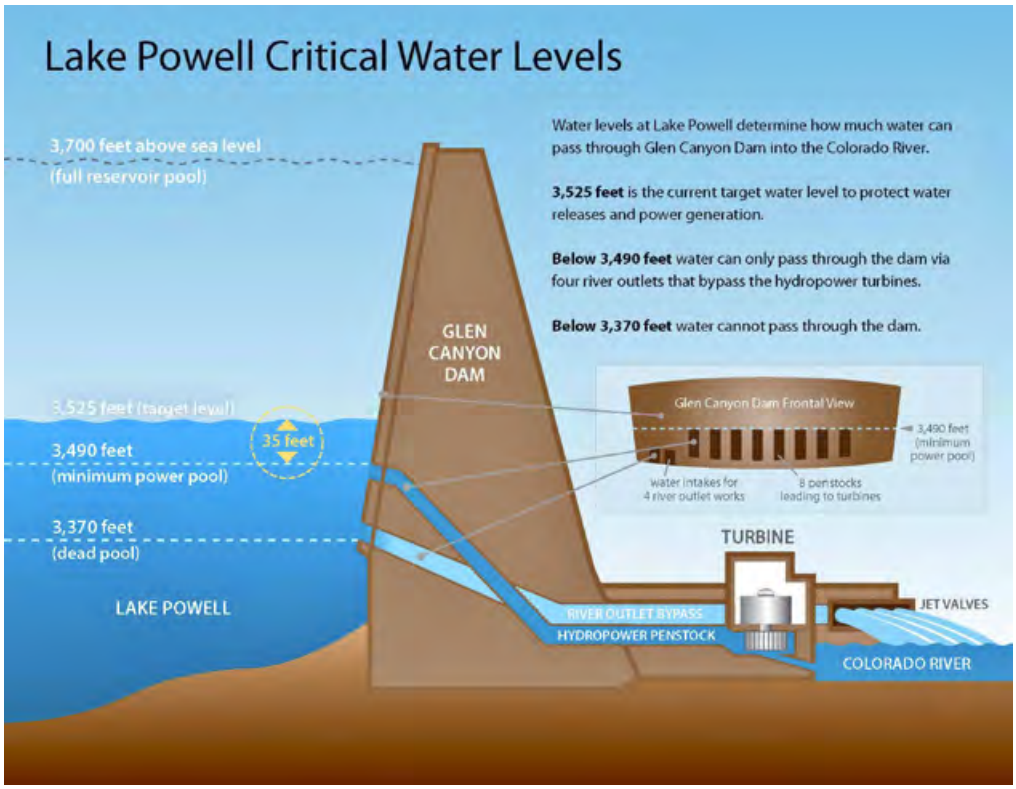


Fig. 4: Lake Powell critical water levels. Graphic: Grand Canyon Trust

where most water becomes trapped behind the dam. Reaching "dead pool" would mean only a trickle of water would flow through the Grand Canyon. A comprehensive planning effort to study Glen Canyon Dam infrastructure authorized and funded by the U.S. Congress is necessary to ensure that the dam's design does not prevent adequate flows from being released through the dam as critically low water levels become the norm.

Native fish at risk in the Grand Canyon

The Grand Canyon provides refuge for native fish in the Colorado River, including ninety-two percent of all humpback chub. Only five of the original eight endemic fish species can still be found in the Colorado River below the dam, including the threatened humpback chub.

Low reservoir levels in Lake Powell are creating challenges for native fish by allowing nonnative sportsfish like Smallmouth bass to travel through Glen Canyon Dam's turbines and into Marble and Grand Canyons downstream. The introduction of Smallmouth bass was alarming, as they prey on and compete for resources with Humpback chub and other native fish. Because Tribes of the Grand Canyon do not consent to the taking of lives in the canyon, including nonnative fish, it is important to find other solutions to protect native fish populations, as killing nonnative fish is not a viable option.

One such solution is maintaining Lake Powell water levels above 3,525 feet – ideally 3,540 feet. This prevents non-native fish passage and protects native species like the humpback chub. This also ensures that high-flow experiments, which protect the Grand Canyon's ecology, can continue. Another solution is continuing to do cool water releases through the dam to maintain temperatures that discourage non-native fish reproduction. These cool releases began in 2024 but are at risk of being cancelled. A final solution being assessed is to build a physical barrier to prevent non-native fish from passing through the dam. This time sensitive issue must be addressed quickly, as once non-native fish are established, it can be very difficult and costly to remove them.



Fig. 5: The Humpback Chub (Gila cypha) is one of the eight fish species endemic to the Colorado river and listed as "Endangered" by the IUCN. The Grand Canyon NP remains its only major habitat, and a depletion of the Colorado river's water level could well lead to its extinction. Photo: Melissa Trammel / US National Park Service

Chaco Canyon is Again Under Threat

Paul F. Reed, Archaeology Southwest



Fig. 1: Pueblo Bonito is the most prominent ancient structure in the Chaco Culture National Historic Park, with numerous kivas, circular ceremonial chambers used by different clans and spiritual brotherhoods

Photo: Wikipedia commons

One of our most beloved and special places — Chaco Culture National Historical Park — is once again threatened.

In late March and early April of this year, the Trump administration completed an extremely short 7-day Public Scoping period as it moves quickly to revoke the mineral withdrawal in the 10-mile zone of protection around Chaco Park and allow oil and gas drilling on Chaco's doorstep!

In October 2025, the administration initiated this action by announcing Tribal consultation on its proposal to reverse Public Land Order (PLO) 7923, which withdrew and put 336,400 acres surrounding Chaco Culture National Historical Park off limits to unchecked extractive mineral development for 20 years. If the Department of Interior (DOI) moves forward with its proposal, new oil and gas leasing and development on Federal lands will be allowed within 10 miles of the Park's boundaries — even on lands directly bordering the Park — threatening the irreplaceable sacred and cultural resources throughout the Greater Chaco Landscape.

The Greater Chaco Landscape includes Chaco Culture National Historical Park and thousands of archaeological and cultural sites, including great houses, small pueblos, roads, and special sites constructed by the ancestors of today's Pueblo people of New Mexico and Texas, and the Hopi Tribe, as well as sites of continuing significance to the Navajo Nation and other Indigenous Nations. Chaco Canyon flourished as a major cultural and ceremonial center between 850 and 1250 CE, and its legacy remains central to the cultural identity, traditions, and ongoing practices of Indigenous peoples in the region. Chaco Canyon was designated as a UNESCO World Heritage Site because the culture and heritage of the Indigenous peoples of the American Southwest are inextricably linked to the ongoing protection of the Greater Chaco Landscape.

The DOI is rushing to overturn protections and is giving the public only 7 days to weigh in. This hasty and deficient process stands in stark contrast to the robust public process used to create the withdrawal, which included 150 days for public comment, 8 public meetings, and 1.5 years of careful consideration. In addition to DOI's "preferred alternative," which would remove protections all together, the DOI has also proposed a second alternative that would reduce the size of the buffer around the park to only 5 miles.

Although only 15–20% of the area has been surveyed, archaeologists estimate that as many as 12,000 cultural sites and traditional cultural places lie within the 5-to-10-mile zone, all of which would be exposed to harmful drilling under this second option.

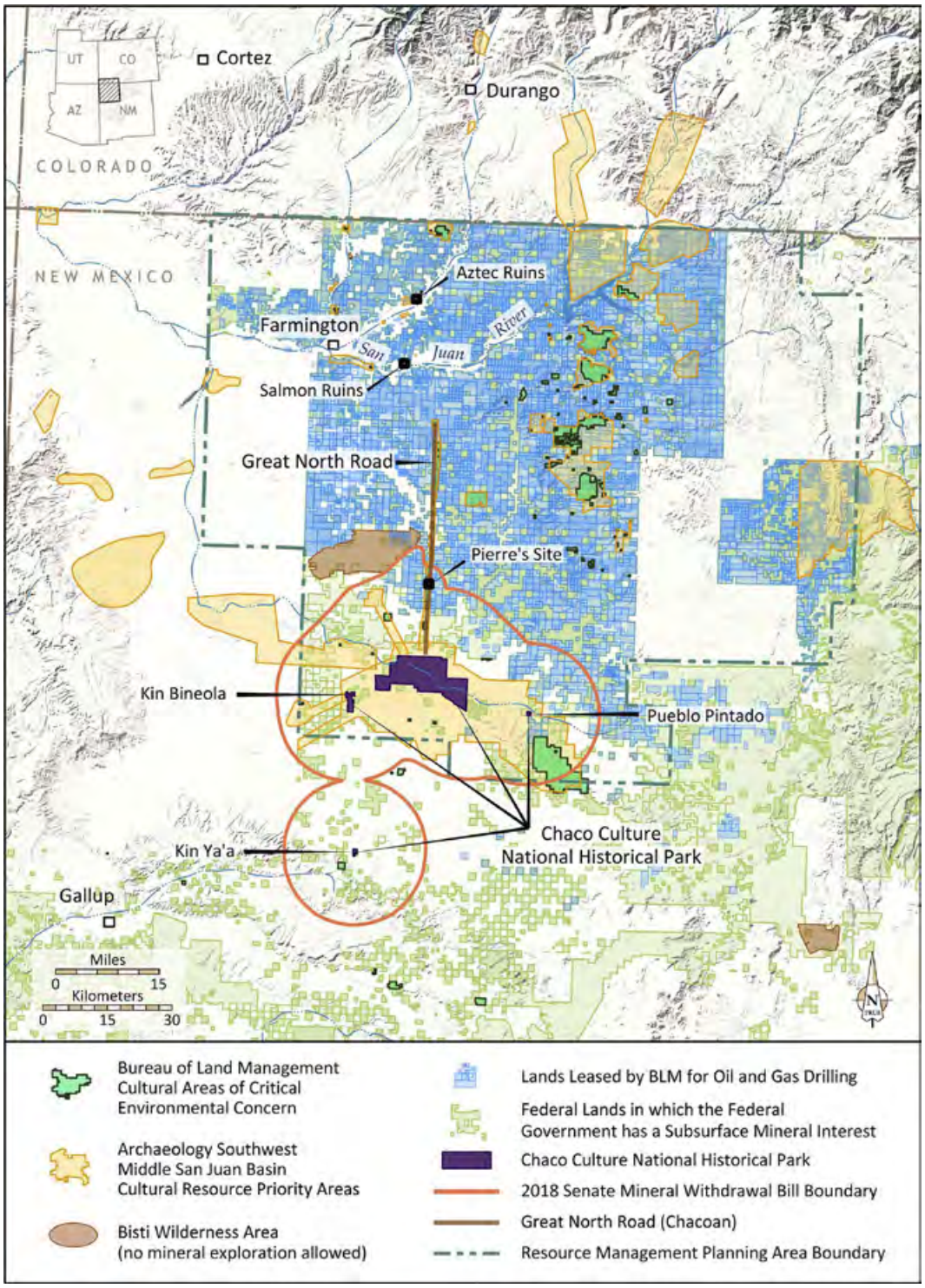


Fig. 2: Oil and gas development around the Chaco Culture National Historical Park and World Heritage site. Map:ArcheologySouthwest

With nearly 90% of the region already leased before protections were put in place, intensive drilling has caused significant harm to the health of local and Indigenous communities, air quality, and cultural integrity in the landscape surrounding Chaco Culture National Historical Park. Oil and gas wells, roads, pipelines, and other infrastructure have destroyed significant cultural sites and transformed others into industrial wastelands. To allow more drilling in this area would completely disregard the calls from Tribes, including the 20 sovereign Pueblos that collectively participate in the All Pueblo Council of Governors, the National Congress of American Indians, the Mescalero Apache Tribe, elected officials, and other communities who share a deep connection to Chaco Canyon.

Without this critical safeguard in place, the landscape is at great risk of being further degraded. The Greater Chaco region has already suffered from significant damage to air, water, and public health due to oil and gas extraction, and unrestrained oil and gas development will jeopardize the longevity of invaluable traditions and cultures.

This proposal is part of a much larger effort by the administration and DOI leadership to turn over public lands, including places with exceptional conservation and cultural values like the Greater Chaco Landscape, to the oil and gas industry. Already, the July 2025 federal budget reconciliation bill required the Bureau of Land Management to offer a staggering 87% of New Mexico's public and private lands with federally managed subsurface minerals for oil and gas leasing several times each year. This administration is seeking to elevate oil and gas above all other uses of public lands, even in areas with irreplaceable values like Chaco Canyon and where there is widespread opposition from local communities. A Colorado College poll which was released this year found that 71% of voters in New Mexico oppose allowing energy development on public lands near Chaco Culture National Historical Park.

The All Pueblo Council of Governors (APCG) has spoken out against this harmful action: "the All Pueblo Council of Governors strongly opposes the Bureau of Land Management's proposed revocation of PLO 7923 in whole or in part, and demands that the Department of the Interior immediately suspend all actions related to the revocation pending full, meaningful, and government-to-government consultation with affected Pueblos and Tribes." APCG Resolution 2025-07 (annexed).

U.S. Senator Martin Heinrich (Democrat – New Mexico), U.S. Senator Ben Ray Luján (D-N.M.), U.S. Representative Teresa Leger Fernández (D-N.M.), U.S. Representative Melanie Stansbury (D-N.M.), and U.S. Representative Gabe Vasquez (D-N.M.) released the following statements regarding the Trump administration's new actions to eliminate protections for the Greater Chaco Region that safeguard the area from new oil and gas leasing, undoing a 20-year mineral withdrawal that has kept public lands surrounding Chaco Culture National Historical Park off-limits to new development.

> "Chaco Canyon is one of the most important living cultural landscapes on the planet. It holds deep meaning for many communities and Pueblos across New Mexico. By wrongfully revoking Chaco's protections, the Trump Administration is hoping to allow new oil and gas development in the vicinity of Chaco Culture National Historical Park and the Chaco Canyon landscape. To deface and destroy this irreplaceable and sacred landscape is not only morally wrong: It is utterly disrespectful to the Pueblos, Tribal Nations, and New Mexicans who have called for permanent protection of the Chaco landscape," said the N.M. Delegation.
>
> "We will do everything we can to get our Chaco Cultural Heritage Area Protection Act passed into law to permanently protect Chaco Canyon. This is not about the past; it is about the generations to come. And we stand united alongside everyone who believes that Chaco Canyon is a place worth protecting." (https://www.heinrich.senate.gov/newsroom/press-releases/breaking-nm-delegation-condemns-trump-administrations-move-to-begin-reversing-protections-for-chaco-canyon?fbclid=IwY2xjawN2-lhleHRuA2FlbQIxMQBicmlkETFzdWlsYzVJV3E5djJ4WkowAR6BA9W7ZnNWd5zZJTjNdsAIPDlta-H7IRlN4MRefUJzHIa0GxFtYS6X-D41G_g_aem_lyMT3GnS_UQtcsJTTYQnLw)

The scoping comment period, which ended April 7, was intended to identify issues that should be included in a forthcoming environmental assessment. Another comment period will open when the assessment is made available to the public, the agency said. It is evaluating three possibilities: leaving the 10-mile withdrawal zone in place; shrinking it to five miles around Chaco Canyon; or — the agency's preference — striking the protections altogether. As our Greater Chaco Coalition rallied supporters and generated more than 100,000 comments against this terrible action!



Fig. 3: Paul F. Reed and his wife Tristan Kwiecinski holding up placards in Taos, New Mexico, itself the location of a World Heritage property.

DOI is expected to announce the Environmental Assessment (EA) process under the provisions of the National Environmental Policy Act (NEPA) in May and move to allow incredibly damaging oil and gas development on Chaco's boundary. This is expected to unfold under a very short 14-day comment period.

I am personally appalled that Secretary Burgum is moving to revoke the mineral withdrawal and put Chaco's 10-mile zone of protection and the Greater Chaco Landscape at risk. My wife and I walked the streets of Taos, New Mexico to rally support (Fig. 3). The amazing cultural heritage of Chaco Culture National Historical Park must not be compromised. As the process moves forward, we demand a full 90-day NEPA process with several public meetings, allowing the public to fully participate and make their feelings known.

Annex: Resolution 2025-07 of the All Pueblo Council of Governors

All Pueblo Council of Governors

Officers:
Dominic Gachupin, Chairman
Lt. Governor Craig Quanchello, Vice Chairman
Governor Cordelia Hooee, Secretary

RESOLUTION

ALL PUEBLO COUNCIL OF GOVERNORS
RESOLUTION NO. APCG 2025-07

Acoma
Cochiti
Isleta
Jemez
Laguna
Nambe
Ohkay Owingeh
Picuris
Pojoaque
Sandia
San Felipe
San Ildefonso
Santa Ana
Santa Clara
Santo Domingo
Taos
Tesuque
Ysleta del Sur
Zia
Zuni

TO OPPOSE THE BUREAU OF LAND MANAGEMENT'S INITIATION OF THE PROCESS TO REVOKE PUBLIC LAND ORDER NO. 7923, TO DEMAND SUSPENSION OF THE REVOCATION PROCESS PENDING GOVERNMENT-TO-GOVERNMENT CONSULTATION, AND TO REAFFIRM THE ALL PUEBLO COUNCIL OF GOVERNORS' COMMITMENT TO THE PROTECTION OF THE GREATER CHACO LANDSCAPE

WHEREAS, the All Pueblo Council of Governors (APCG) is comprised of the Pueblos of Acoma, Cochiti, Isleta, Jemez, Laguna, Nambe, Ohkay Owingeh, Picuris, Pojoaque, San Felipe, San Ildefonso, Sandia, Santa Ana, Santa Clara, Santo Domingo, Taos, Tesuque, Zia, and Zuni, and one Pueblo in Texas, Ysleta del Sur, each possessing inherent sovereignty and the authority to govern its own affairs; and

WHEREAS, the Greater Chaco Region, encompassing Chaco Culture National Historical Park ("Chaco Canyon") and surrounding cultural landscapes, holds profound spiritual, historical, and cultural significance to many Pueblos and Tribes, including the Hopi Tribe, in the Southwest; and

WHEREAS, for more than a decade, the APCG has consistently acted to protect Chaco Canyon and the Greater Chaco Region, as reflected in prior resolutions including APCG 2025-02, 2024-06, 2024-05, 2023-08, 2022-06, 2019-10, and 2017-12, which collectively call for permanent withdrawal of federal lands from mineral leasing, completion of the Greater Chaco Resource Management Plan Amendment (RMPA), and passage of the Chaco Cultural Heritage Area Protection Act; and

WHEREAS, on June 7, 2023, the U.S. Department of the Interior issued Public Land Order (PLO) No. 7923, withdrawing approximately 336,404 acres of federal lands in an approximate ten-mile buffer area surrounding Chaco Culture National Historical Park from new mineral leasing and entry under the U.S. mining laws for a period of twenty (20) years, recognizing the cultural and environmental sensitivity of the area; and

WHEREAS, PLO No. 7923 protects valid existing mineral and leasing rights along with Navajo Nation's and Navajo Allottees mineral and leasing rights;

WHEREAS, since December of 2019, Congress through appropriations legislation has also maintained a moratorium preventing new oil and gas leasing and development on federal land in the ten-mile buffer area; and

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Dominic Gachupin, Chairman
Lt. Governor Craig Quanchello, Vice Chairman
Governor Cordelia Hooee, Secretary

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WHEREAS, prior to the PLO 7923 the New Mexico State Land Office withdrew adjoining state trust lands within the same ten-mile buffer, as part of a cooperative framework of federal, state, and tribal protection; and

WHEREAS, PLO 7923 was initiated in full compliance of the Federal Land Policy and Management Act, the National Environmental Policy Act (NEPA), and the National Historic Preservation Act (NHPA);

WHEREAS, on October 30, 2025, the Bureau of Land Management (BLM) Farmington Field Office issued formal written notice initiating a process to revoke PLO 7923 in whole or in part, citing Executive Order 14154 ("Unleashing American Energy") and Secretary's Order 3418, and proposing to revert management of the area to the outdated 2003 Farmington Resource Management Plan; and

WHEREAS, the BLM's proposed preparation of only an Environmental Assessment (EA) is procedurally and substantively inadequate, as the revocation of PLO 7923 would reopen over 336,000 acres to new mineral leasing and mining, constituting a major federal action that may significantly affect the quality of the human environment; and

WHEREAS, under NEPA, such an action requires preparation of a full Environmental Impact Statement (EIS) to assess cumulative, cultural, and environmental consequences, given that the proposed revocation would materially alter and disturb landscapes of exceptional cultural importance; and

WHEREAS, the BLM letter announced an expedited process and 14-day public comment period without adequate prior government-to-government consultation, contrary to Executive Order 13175, the Department of the Interior's Tribal Consultation Policy, NHPA, and the federal trust responsibility; and

WHEREAS, the timing of the BLM's notice and proposed 14-day comment period coincides with an ongoing federal government shutdown that limits agency operations and communication, and may overlap with Pueblo leadership transitions in December and January, together preventing meaningful consultation and timely participation as required under Executive Order 13175, NEPA, and the Department of the Interior's Tribal Consultation Policy; and

WHEREAS, proceeding with consultation or public comment during a period of government shutdown and tribal transition fails to provide the meaningful and timely engagement; and

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WHEREAS, the proposed revocation of PLO 7923 disregards the thorough procedural and guidance followed under FLMPA, NEPA, and NHPA with more than a decade of formal consultation and public record supporting the withdrawal, and exposes irreplaceable cultural resources to immediate and cumulative harm; and

WHEREAS, any attempt to revoke or reduce the withdrawal before completing an updated RMPA would return management to a plan that predates horizontal drilling and fails to account for the extensive oil and gas development, cumulative impacts, and updated scientific and cultural information that have emerged since the 2003 Resource Management Plan was adopted; and

WHEREAS, such an action would also disregard the Chaco Heritage Tribal Association (CHTA) ethnographic study, a federally funded study specifically done to address the absence of needed information in the records of the BLM, which provides a foundation for understanding the cultural significance of the Greater Chaco Region and should inform all future federal planning and decision-making; and

WHEREAS, the APCG finds that the BLM's action threatens to dismantle years of tribal, federal, and state coordination, undermines the integrity of the consultation process, and places the Greater Chaco Region at renewed risk from extractive development.

NOW THEREFORE BE IT RESOLVED, that the All Pueblo Council of Governors strongly opposes the Bureau of Land Management's proposed revocation of PLO 7923 in whole or in part, and demands that the Department of the Interior immediately suspend all actions related to the revocation pending full, meaningful, and government-to-government consultation with affected Pueblos and Tribes; and

BE IT FURTHER RESOLVED, that the APCG reaffirms its demand that the Department of the Interior restart and complete the Greater Chaco RMPA, incorporating robust tribal consultation, ethnographic data, and updated scientific analysis to ensure that any future management decisions are culturally and environmentally responsible; and

BE IT FURTHER RESOLVED, that the APCG urges the United States Congress to expedite passage of the Chaco Cultural Heritage Area Protection Act to make the ten-mile buffer permanent, protecting the Greater Chaco Landscape from future administrative reversals; and

BE IT FURTHER RESOLVED, that the APCG calls upon the New Mexico State Land Office and other state and local partners to maintain their protective withdrawals and to coordinate with the Pueblos in opposing the federal revocation effort; and

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BE IT FURTHER RESOLVED, that this resolution shall serve as a reaffirmation of APCG Resolution No. 2025-02 and as an urgent response to the BLM's October 30, 2025, action, declaring the proposed revocation an imminent threat to the cultural and spiritual integrity of the Greater Chaco Region; and

BE IT FINALLY RESOLVED, that the Chairman or his designee is authorized to take all actions necessary to implement this resolution, including transmitting it to the President of the United States, the Secretary of the Interior, the Director of the Bureau of Land Management, the New Mexico Congressional Delegation, and other relevant agencies and partners.

CERTIFICATION

We, the undersigned officials of the All Pueblo Council of Governors, hereby certify that the foregoing Resolution No. APCG 2025-07 was considered and adopted at a duly called council meeting held on the 14th day of November, 2025, at which a quorum was present, and the same was approved by a vote of 17 in favor, 0 against, 0 abstaining, and 3 absent.

ALL PUEBLO COUNCIL OF GOVERNORS

By: Dominic Gachupin
Dominic Gachupin, Chairman

ATTEST: Cordelia Hooee
Cordelia Hooee, Secretary

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Action Plan for El Pinacate Still Outstanding; In Danger Listing Remains Warranted

Alejandro Olivera, Center for Biological Diversity

Background: OUVs and cross-border wildlife connectivity remain at stake

Unique Sonoran Desert wildlife is among the Outstanding Universal Values (OUV) of El Pinacate and Gran Desierto de Altar Biosphere Reserve (El Pinacate), and several key species depend on landscape-scale ecological connectivity across the U.S.–Mexico border to support dispersal, seasonal movement, and genetic exchange. In Mexico's 2026 State of Conservation (SOC) update[1]—discussing the endangered Sonoran pronghorn—the SOC states that "[t]he long-term survival of this subspecies requires ensuring ecological connectivity across the international border." This makes clear that the border wall threatens the property's ecological integrity by cutting off cross-border wildlife movement.

Border barrier impacts: fragmentation of habitat and corridors

Mexico's 2026 SOC submission reports that the U.S. border wall extends roughly 48 km in the border region relevant to El Pinacate and was built during the first half of 2020. While earlier infrastructure (e.g., Highway 2 and fencing) already constrained movement, the current wall's continuous design increased height, and underground anchoring further reduce functional connectivity. Mexico reports that these features limit wildlife movement and recolonization, reduce gene flow, and constrain adaptive responses at landscape scale—directly implicating the property's integrity and biodiversity values.[2]

Mexico's SOC also identifies multiple affected species and emphasizes that "natural movements have been interrupted," including the endangered Sonoran pronghorn and other wide-ranging mammals (e.g., bighorn sheep, mule deer, puma, bobcat), underscoring continuing corridor and connectivity impacts at the boundary.[3]

Committee process: latest decision (2025) and postponed reactive monitoring mission

In its 2025 decision (47 COM 7B.37), the Committee continued to keep the property under active review and reiterated that a



Fig. 1: Map of the El Pinacate and Gran Desierto de Altar Biosphere Reserve and the adjacent U.S.– Mexico border segment, showing the approximate alignment of the border barrier (red/orange line) running along the northern edge of the property near Organ Pipe Cactus National Monument. *Map: Wildlands network*

joint U.S.–Mexico action plan remained outstanding and that the requested reactive monitoring mission had once again been postponed. The Committee further reaffirmed that if "ecological connectivity is not restored to safeguard the viability of key wildlife populations, the property may meet the conditions for inscription on the List of World Heritage in Danger."[4]

Limited mitigation steps: small openings do not resolve connectivity severance

Under the July 2023 settlement filed in federal court (*Sierra Club v. Biden*), the US Department of Homeland Security/Customs and Border Protection committed to a limited set of discrete "openings" in the existing barrier system, including three "large wildlife passages" (one at Cabeza Prieta NWR–Pinta Sands designed for Sonoran pronghorn, with an 18-foot ceiling height) and a requirement to keep stormwater gates open full-time at four locations, including two sites in Organ Pipe National Monument (Rio Sonoyta and Aguajita Spring). These measures are geographically limited and operationally contingent (temporary closures are allowed), and the agreement also references additional "small wildlife" passages without committing to a fixed number—underscoring why these steps do not substitute for restoring landscape-scale connectivity along the broader walled segment affecting the property's ecological integrity.5,6 Against Mexico's reported ~48-km wall length in this border context, that is only three specified openings—roughly one every 16 km—before accounting for any additional small-wildlife passages, which the settlement does not quantify or site specifically. Even where openings exist, the best available science indicates that small passages provide partial benefit for some animals but do not address the near-complete barrier for many large mammals and corridor-dependent species.7

Best available science: severe reductions in successful wildlife crossings

Newer evidence continues to demonstrate that the border wall system is functionally incompatible with maintaining cross-border ecological connectivity. A peer-reviewed study found that only 9% of recorded wildlife encounters with the wall resulted in a successful crossing—an 86% decline compared with crossings at earlier vehicle barriers—and documented zero successful crossings at wall segments for several large-bodied species (including mule deer, white-tailed deer, black bear, badger, wild turkey, and mountain lion)[8] The same study found that the small "wildlife openings" increased crossings for some species, but such passages were sparse and insufficient in size/frequency to mitigate broader connectivity loss at landscape scale.[9] These findings support and quantify the Committee's previous findings that the border wall greatly impedes ecological connectivity.



Fig. 2: A coyote navigates the steel bollard border wall at a small wildlife passage (camera-trap image). *Photo: Wildlands Network*



Fig. 3: A mountain lion pauses at the steel bollard border wall, illustrating barrier effects on large mammals (camera-trap image). *Photo: Wildlands Network*

2025–Jan 2026 U.S. context: no confirmed new construction immediately adjacent to the property, but renewed expansion pressure elsewhere

In 2025, the United States did not build new border-wall immediately adjacent to the northern boundary of El Pinacate (the Organ Pipe–Cabeza Prieta segment). However, this area has already been deeply severed by existing border wall (Figures 1 and 2).[10]

At the same time, renewed border-infrastructure activity in other corridors along the Arizona border demonstrates that expansion pressure can re-emerge quickly, and the Committee's request that the United States refrain from new intensification pending an action plan and Advisory Body review remains important. As an illustrative parallel, recent U.S. reporting on the San Rafael Valley corridor describes renewed wall expansion pressure in a landscape used by wide-ranging wildlife (including rare jaguar dispersal into the U.S.), highlighting how quickly corridor functionality can be lost when barrier projects advance without a connectivity strategy.[11,12]

Requested Committee actions (2026 priorities)

Require submission and public availability (as feasible) of the joint U.S.–Mexico action plan addressing ecological connectivity, mitigation, financing, governance, and implementation timelines, for review by the Advisory Bodies.

Deploy the reactive monitoring mission without further delay, with a clear mandate to evaluate connectivity impacts, adequacy of mitigation, and the feasibility of restoring functional wildlife movement across the barrier system.

Request the United States to refrain from any new barrier expansion or intensification in the El Pinacate border context pending delivery of the action plan and Advisory Body review of mitigation adequacy, consistent with prior Committee concern about impacts to integrity.

Proceed toward "In Danger" listing at the next Committee session as the continued absence of a joint action plan and repeated delays to the reactive monitoring mission—against the backdrop of ongoing connectivity impairment—mean that conditions for "In Danger" inscription are met.

OUV / requirement	What is at stake (WH framing)	Border barrier relevance (key impact pathway)	What the Committee should request / what to evidence
Criterion (vii)	Exceptional natural beauty; intact desert landscape setting	Linear infrastructure near the boundary can degrade the natural setting (visual intrusion, lighting, edge effects)	Mission to document visibility/lighting footprint from within the property; measures to avoid/disable/remove lighting and minimize visual/edge impacts
Criterion (viii)	Geological/geomorphological values (volcanic and desert landforms)	Typically, indirect risk: access/roadworks and ground disturbance can affect land-surface stability and setting near the boundary	Confirm any new ground disturbance/ roads; assess erosion/hydrological changes linked to cleared patrol roads
Criterion (x)	Biodiversity values; habitats and ecological processes supporting threatened species	Direct integrity risk: barrier interrupts movement/dispersal, increases fragmentation and population isolation; alters behavior; constrains climate adaptation	Require a funded, operational mitigation plan with measurable connectivity outcomes (openings design/spacing; monitoring; governance; financing); species-focused movement evidence
Conditions of integrity	Maintenance of ecological processes and (where relevant) landscape-scale connectivity	Barrier effects can undermine integrity by severing functional connectivity with adjoining protected lands/corridors	Mission to assess corridor functionality and feasibility of restoring functional movement; define connectivity indicators/ benchmarks
Protection & management requirements	Effective management and transboundary cooperation consistent with OUV	Connectivity mitigation requires binational coordination; absence of an agreed plan is a management deficiency	Request submission/public availability (as feasible) of the joint action plan; implementation timetable; reporting on measures delivered vs. planned

Fig. 4: Outstanding Universal Value (OUV) elements potentially affected by U.S. border barrier impacts at El Pinacate, and related Committee information needs

Notes

1 El Pinacate and Gran Desierto de Altar Biosphere Reserve. State of Conservation Report 2026; Consistent with that timeframe, the U.S. government issued a Department of Homeland Security (DHS) determination/waiver (under IIRIRA §102(c)), effective 20 February 2020, to expedite border-barrier construction and related works in Pima County, Arizona (among other border counties), which includes the Organ Pipe/Cabeza Prieta segment.

2 Id.

3 Orellana Hernandez, A. (2025, August 10). A rare jaguar roams Arizona. Border wall expansion imperils its future. The Washington Post. https://www.washingtonpost.com/nation/2025/08/10/jaguar-arizona-border-wall-wildlife/

4 World Heritage Committee, 2025, Decision 47 COM 7B.37

5 California Department of Justice. (2023). Settlement agreement (Sierra Club et al. v. Trump et al.) (filed July 2023). https://skyislandalliance.org/wp-content/uploads/2024/11/Border-Wall-Study_PR_11.21.24-FINAL.pdf ; American Civil Liberties Union. (2023, July 17). Sierra Club, Southern Border Communities Coalition, and ACLU reach settlement with U.S. government in border wall case challenging the illegal transfer of military construction funds [Press release]. https://www.aclu.org/press-releases/sierra-club-southern-border-communities-coalition-and-aclu-reach-settlement-with-u-s-government-in-border-wall-case-challenging-the-illegal-transfer-of-military-construction-funds State of California et al. (2023, July 10). Settlement agreement (Border wall settlement with signature pages) [Settlement agreement]. California Department of Justice. https://oag.ca.gov/system/files/attachments/press-docs/Border%20Wall%20Settlement%20with%20Signature%20Pages.pdf

6 KAWC. (2023, July 19). Arizona border wall to get openings for wildlife. https://www.kawc.org/news/2023-07-19/arizona-border-wall-to-get-openings-for-wildlife

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9 Id.

10 World Heritage Committee, 2025, Decision 47 COM 7B.37

11 Orellana Hernandez, A. (2025, August 10). A rare jaguar roams Arizona. Border wall expansion imperils its future. The Washington Post. https://www.washingtonpost.com/nation/2025/08/10/jaguar-arizona-border-wall-wildlife/

12 USAspending.gov lists CBP contract actions for "NEW VERTICAL BARRIER BORDER WALL … within the Tucson, Arizona Sector," including the Sonoita area (TCA 10-4). U.S. Department of the Treasury. Award: CONT_AWD_70B01C25F00000328_7014 [Contract award record]. USAspending.gov. Retrieved January 27, 2026, from https://www.usaspending.gov/award/CONT_AWD_70B01C25F00000328_7014; U.S. Department of the Treasury. Award: CONT_AWD_70B01C26F00000073_7014 [Contract award record]. USAspending.gov. Retrieved January 27, 2026, from https://www.usaspending.gov/award/CONT_AWD_70B01C26F00000073_7014

Canaima National Park Facing the Increase of Illegal Dredge Gold Mining Along the Caroní River

Cristina Burelli, SOSOrinoco

Illegal gold mining, unmanaged tourism (including helicopter overflights and mass use above carrying capacity on tepui summits), invasive alien species, recurrent wildfires, and unsustainable governance continue to erode the Outstanding Universal Value (OUV) of Canaima National Park (CNP), a Natural World Heritage Site since 1994. Between 2018 and 2025, satellite-based assessments and literature reviews consistently documented the expansion of the mining footprint inside the property and in its de facto buffer zone, escalating forest loss, and rising mercury exposure risks for indigenous Pemón and local communities and aquatic biota (SOSOrinoco, 2021-2025).

Until the end of 2025, remote sensing analysis identified 1,852 hectares of illegal gold mining activities (Fig.s 2 and 4), transforming the landscape of the national park, and 49 or more active dredge rafts ("balsas" or "dragas") deployed along the Caroní River, whose riverbed and body of water are entirely within the limits of the national park (Fig.s 1,3, 5), and also along the Karuai river in the center of the NP. During the 2024–2025 period, an additional 300 hectares of land were lost to illegal mining expansion. This includes 72 new hectares at the base of the Chimantá tepuy, in the heart of the park. This situation reveals utter negligence on the part of the park authorities. Using the Mining Impacts Calculator (standard 55 hp engine, 1-year operation), these 49 dredges could drive a socio-environmental impact estimation of ~US$ 52.3 million, extraction of 195,334 g of gold and mobilize ~7.5 million tons of sediments in one year, degrading water quality, local fisheries and potable water services. Mercury used in processing directly contaminates the river system, with plumes traveling up to ~100 km downstream and ~2.6 kg Hg per kg Au, of which ~13 % is discharged to rivers and ~3 % becomes methylmercury available to fish bioaccumulation.[1]



Fig. 1: Dredge mining along the Caroní River, Canaima National Park. Photo: Google Earth / SOSOrinoco

Fig. 2: Gold Mining activities quantified inside Canaima National Park using remote sensing. Source: visual interpretation of high resolution imagery from Planet Labs.

Rivers directly impacted by mining along their banks	Hectares
Acanan	7.85
Caroní	800.31
Carrao	82.15
Caruay	105.45
Cucurital	80.19
Cuquenán	777
Total	1,852.96



Fig. 3: Riverine dredging along the Caroní River and adjacent mining activities along the borders of Canaima National Park. Photo: Google Earth / SOSOrinoco

The most intensive mining activity within Canaima National Park is concentrated along the right banks of the Cuquenán and Caroní Rivers (Fig. 6). Furthermore, mining along the buffer zone —primarily located on the left bank — remains significant. The Caroní River islands are also being heavily impacted by intensive operations, most notably in the Apacara sector. The resulting sediment runoff into the Guri Reservoir is a matter of grave concern, as it diminishes water storage capacity and compromises the operational lifespan of the hydroelectric turbines. As of February 2026, 148 mining polygons have been identified

1 Values derive from field-verified satellite detections (Google Earth, 2025 scenes) and standardized calculator parameters https://miningcalculator.conservation-strategy.org/calculator



Fig. 4: Distribution of mining footprint and riverine dredging in Canaima National Park, including detailed site analysis.

Map and photos: SOSOrinoco



Fig. 5: Distribution of dredges along the Caroni River. Photo: Google Earth / SOSOrinoco

within Canaima National Park, covering a total area of 1,852.96 hectares. This is a significant impact for a World Heritage Site in absolute terms, regardless of the overall size of the Site; moreover, it has large qualitative and functional impacts on its ecosystem impacts that are several times larger than the simple size of the mining footprint.

The 2018–2025 record shows sustained deterioration of Canaima's OUV driven by illegal mining, use of mercury, wildfires, and unmanaged tourism amid systemic governance failure. In 2026, the detection of 49 dredges operating within the legal river boundary of the park represents a slippery slope toward ecological collapse, shifting acute disturbance into the core of a property inscribed for its pristine waterscapes and tepui ecosystems. Without immediate suppression of in-channel dredging, restoration actions in critical riparian habitats, and enforceable

controls on tourism and invasive species, Canaima's biodiversity, cultural values, and ecosystem services may face irreversible loss.

The Venezuelan government's recent report in response to Decision 47 (WHC/25/47.COM/7B.Add.2) rhetorically downplays illegal mining as a marginal phenomenon affecting a negligible area. While claiming to combat these activities, the State deflects accountability for its mismanagement onto international sanctions, ultimately denying any threat to the park's OUV. This stance reveals a clear lack of political will to address the crisis. By systematically delaying the UNESCO reactive monitoring mission, the government seeks to conceal its negligence and avoid international scrutiny of the park's ongoing degradation. It is obvious that the authorities do not attach importance to its status as a World Heritage Site, and ignore or minimize the magnified functional impacts that each hectare of mine and each dredge has on the ecosystem, and which are also cumulative.

Implications

- Outstanding Universal Value: degradation via bed scouring, plume turbidity, habitat simplification, and cumulative MeHg biomagnification; risks concentrated along Caroní–Canaima axis critical for tourism, Pemón fisheries, and downstream water uses.
- Cultural and social: escalation of illicit economies, internal community tensions, exposure to violence tied to mining control, and erosion of traditional livelihoods — a pattern documented since 2018 and persisting through 2025.

Priority recommendations

To the World Heritage Committee / UNESCO

- List CNP on the "World Heritage in Danger" List to catalyze corrective measures and international assistance, consistent with the trend analyses since 2018 and the 2026 dredge escalation.
- Insist that the State Party (Venezuela) set a firm date for the pending visit by the Reactive Monitoring Mission with an expanded mandate: (i) verify in-channel dredge operations within the legal boundary; (ii) quantify mercury pathways (water–sediment–biota–human); (iii) assess invasive species control on top of tepuis and tourism carrying capacities; (iv) evaluate fire management readiness.

To the State Party (Venezuela)

- Immediate removal of dredge operations within the Caroní river, with judicial follow-up on owners and supply chains (fuel logistics, mercury trade).
- Enforce park zoning and tourism carrying regulations (e.g., Roraima summit), prohibit summit helicopter landings, and implement biosecurity/clean-gear protocols to prevent invasive species.
- Rebuild INPARQUES operational capacity: ranger recruitment/training, riverine patrols, fire management systems (prevention, early warning, rapid response), and visitor regulation at high-pressure nodes (Laguna de Canaima, Auyantepui Kukenan and Roraima access).
- Establish a basin-wide mercury monitoring and health program (hair, blood, fish tissue, sediments, drinking water) with transparent public reporting and clinical referral pathways for affected Pemón and local communities.

To Partners and Donors

- Support independent remote sensing of dredge fleets and mine expansion, which requires expensive high resolution images; fund community-based monitoring, mercury health screenings, alternative livelihoods, and invasive species eradication pilots on tepui summits.

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Statement on the Two Presidential Commissions Reports

Maasai International Solidarity Alliance (MISA)



April 2025 - Communities wait to present their case to a Presidential Commission. Two investigative commission were created in response to the massive protests against evictions in the Ngorongoro Conservation Area in 2024. Photo: MISA

We, the Maasai International Solidarity Alliance, a platform that defends the rights of the Maasai in Tanzania and internationally, issue this statement in response to the reports of the two Presidential Commissions presented on **12 March 2026,** concerning land use and relocation policies in our homeland.
After careful consideration, we **categorically reject the recommendations of these commissions**.

A flawed process

The formation of the two Commissions in December 2024 was a direct response to the large protests of August 2024. When we, the Maasai, stood up to demand our rights, it was to send a clear message to state authorities that repression should stop. The establishment of two Commissions has created hope among our communities that their concerns, experiences and proposals would be heard and reflected in the reports. Our people came out in large numbers to testify, hoping that the process would help resolve existing land-use disputes. From the outset, however, **the Terms of Reference (ToR) were designed to rubber-stamp decisions that had already been made**. Both Commissions focused on how relocation out of the Ngorongoro Division could be carried out successfully, rather than on how to address the issues raised by its residents.

Non-credible reports

The Commission reports are neither independent nor credible assessments of the factual realities of the people living in Ngorongoro, Loliondo, Sale and Msomera. They rely heavily on previously contested policy documents such as the 2019 Multiple Land Use Model (MLUM) Report (revised 2024) and reproduce the same narratives that have long been used to justify the **displacement of Maasai pastoralists from our ancestral lands**. The conclusions presented are based on **inflated population projections, selective and incorrect use of human, wildlife and livestock data, and serious institutional conflicts of interest**, while ignoring scientific evidence that contradicts the state narrative. We are deeply concerned that the Commissions' recommendations completely ignored residents' opinions. If implemented, such recommendations will increase existing land use disputes instead of resolving them.

False narratives

For generations, we Maasai have lived in Ngorongoro in a system of **co-existence with wildlife**. Our pastoral livelihood is not and will not be a threat to conservation. On the contrary, our traditional knowledge and communal land management practices have **sustained this ecosystem for centuries**. The two Commissions attempt to portray our presence as the primary source of environmental pressure, which is not true. At the same time, the Commissions are completely **ignoring the rapid expansion of tourism infrastructure, luxury lodges, roads, hunting and safari traffic,** which have a negative impact on wildlife and the environment. These omissions reveal a clear bias: pastoralist communities are blamed, while commercial interests are treated as environmentally neutral.

Some admissions but no accountability

We welcome the admission by one of the two Commissions that relocation policies implemented since 2021 have not been

voluntary. We have repeatedly stated that our communities have experienced unacceptable restrictions on basic services, land access, and social infrastructure that have effectively **coerced our people to leave their homes through deprivation rather than choice**. We denounce the fact that the Commissions are silent on the implication of government officials in the mistreatment and repression of the Maasai, a silence that reflects potential bias. The two Commissions failed to hold the government accountable for the removal of social services, including the grounding of the Flying Medical Service, which has had devastating consequences on our people's health. We categorically reject the recommendation that relocation should continue.

We welcome the admission that residents from Loliondo want land in Pololeti back, but condemn the Commissions for **failing to address the legality of the creation of Pololeti Game Reserve**. We disagree with the fact that the Commissions made recommendations about Lake Natron, which was not part of the Commissions' mandate and whose people did not speak with the Commissions. We **reject the Commissions' statement that Lake Natron is a Game Controlled Area (GCA).** The area counts 26 villages and more than 70,000 people. According to Tanzanian law, no GCA can be established or continued in village lands.

Continued harassment

We are equally troubled by developments that have taken place since the reports were submitted to the President. The Tanzanian Broadcast Corporation (TBC) produced a documentary that mirrors the Land Commission's executive summary and amplifies the state propaganda we have witnessed since 2021. It promotes degrading narratives about Ngorongoro Conservation Area (NCA) residents that we consider racist and discriminatory. Now, these narratives are not only aired by media houses but by the State House itself. We are also concerned that, on 15 March, NCAA rangers arrested three Ngorongoro residents in the Ndutu area, ordering them to vacate their land to allow for the expansion of tourism activities.

We therefore state clearly:

- **We reject the recommendations of the Presidential Commissions and urge the State not to implement them. People's voices must be heard.**
- **We will not accept any relocation from our ancestral lands.**
- **We reaffirm our right to Free, Prior and Informed Consent (FPIC) and our legitimate right to remain in Ngorongoro District and continue our pastoral way of life.**
- **We reject the proposed upgrading of Lake Natron into a Game Reserve. We reaffirm that Lake Natron is not a Game Controlled Area (GCA) and is village land under the law.**
- **We reaffirm our legitimate right to manage and access the 1,500 square kilometres of land in Loliondo. Our village lands were illegally and violently converted to the Pololeti Game Reserve in 2022. Livestock confiscations, harassment and arbitrary arrests of herders must stop.**
- **We will not accept any amendments to the NCA Act to legalise the eviction of our people in any way. We will resort to mass peaceful action to resist any attempt to take away the legal protections that were given to our people after being evicted from Serengeti.**
- **We call on the government to stop the ongoing harassment of herders across Pololet, Ndutu, Oldupai and other places in the name of conservation.**
- **We reject the Commission's view that the Multiple Land Use Model has failed. We reaffirm our right to coexist with wildlife and demand that NCA management be placed in the hands of Indigenous Peoples.**

We are **not enemies of conservation**. We are **its custodians**. Our communities have managed and protected wildlife and landscapes for centuries, through systems rooted in culture, strategic mobility, and communal land use. We have a right to stay and should be allowed to live as free Peoples. As Tanzania's first President, Nyerere said:

"You can't turn round and say we no longer want you, you are no longer citizens of our country. What are you going to do? To return them alone or return them with a piece of land? You can't say go home, home where? We couldn't in Tanzania, fed up with Maasai and tell Maasai to go back to Kenya. Kenya is not their home. These are Maasai of Tanzania."

The future of Ngorongoro, Loliondo, Pololeti, Lake Natron and Serengeti lies in recognising **and strengthening the role of the Indigenous Peoples as historical stewards of this land**.

We call upon the Government of Tanzania to exercise its primary obligation under Article 8 of our Constitution to protect the welfare of its citizens. The government must recognise **and protect our rights.** We call on the international donor community, conservation organisations, IUCN and UNESCO to **support the Maasai Conservation Vision and stop promoting conservation models that do not respect Indigenous Peoples and their territories**.

Our position is firm: **We will remain on our land. We want genuine dialogue, not oppression.**

18 March 2026
Signed, MISA.

Traditional Custodians Call for a Moratorium on LNG Production and Best Practices at Murujuga

Save Our Songlines

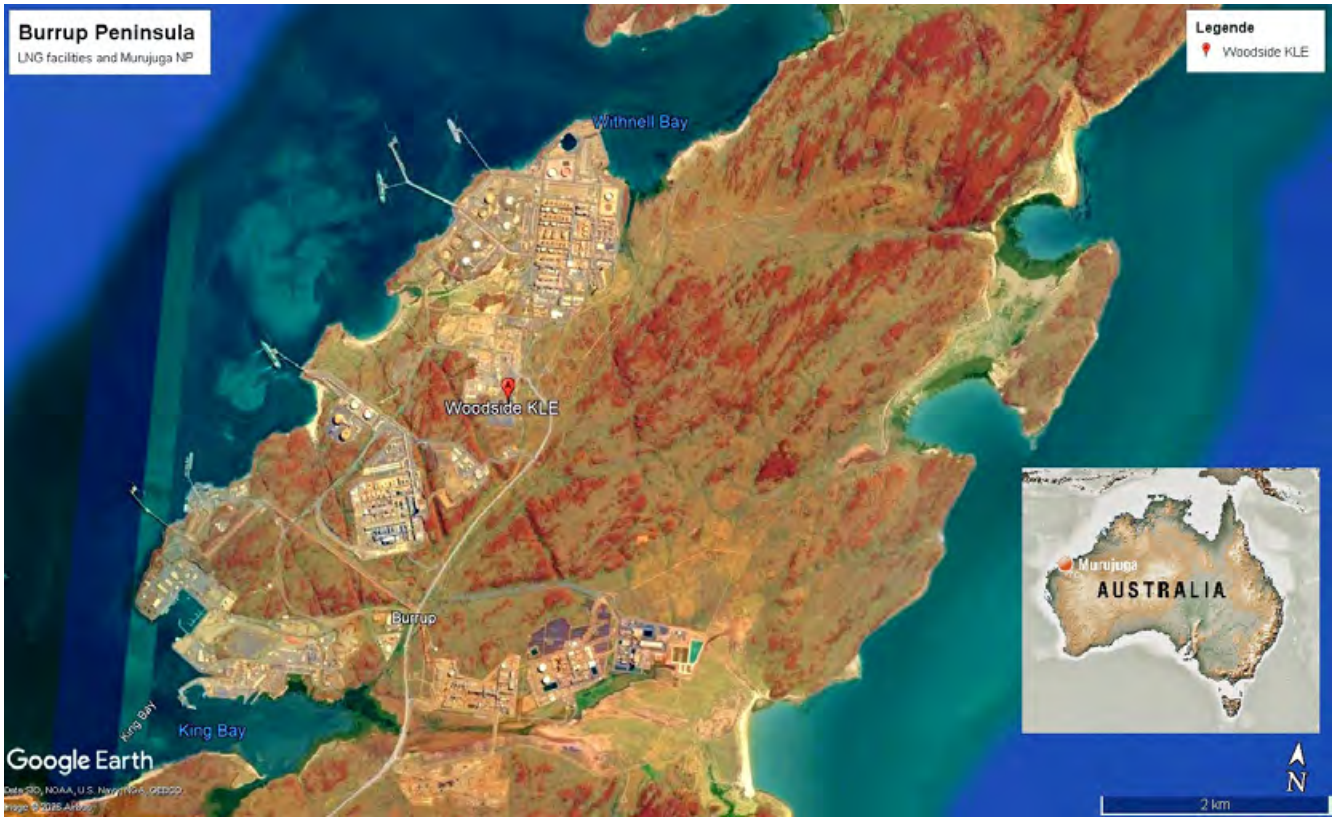


Fig. 1: The lower Burrup Peninsula with massive LNG industrial facilities encroaching into the rock art area.

Map: Google Earth / Bradshaw Foundation

The extraordinary Murujuga rock art and cultural heritage landscape in the Northwest of Western Australia was finally inscribed on the World Heritage List at the UNESCO meeting in Paris 2025. The ICOMOS evaluation report on the Murujuga nomination was clear that the site displayed outstanding universal values. Murujuga contains the largest and oldest collection of rock art in existence; over 1 million petroglyphs documenting a continuous record of human occupation for over 50,000 years. Hundreds of images of long extinct megafauna, as well as the earliest known representations of the human face are among its treasures. Clearly the site is worthy of the highest recognition, however ICOMOS also advised of serious concerns.

The nomination was controversial because of impacts to the heritage values from the ongoing operation and expansion of the largest liquefied natural gas (LNG) processing and petrochemical hub in the Southern Hemisphere. Five existing very large industrial facilities, and one currently under construction occupy a vast area at the centre of Murujuga. Despite the ongoing expansion of this industrial footprint, the industrial zoned land still contains thousands of petroglyphs and remains part of the cultural heritage landscape. While this industrial area was excised out of the World Heritage site boundaries, lines on maps do not provide a barrier to the highly acidic industrial emissions released from these facilities and their ongoing impact on rock art within the boundaries of the heritage site.

In recognition of these industrial impacts, ICOMOS recommended the listing be deferred until action was taken to address them. The draft recommendations included ‘ensuring the total removal of degrading acidic emissions’, ‘preventing

further industrial development' and 'developing an appropriate decommissioning and rehabilitation plan for existing industrial activities'. Rather than addressing the concerns, this instead prompted a major lobbying exercise led by the Australian Government to convince UNESCO that polluting industry could continue at Murujuga, and that ICOMOS' management actions were unnecessary.

This effort was successful in achieving the inscription with much weaker management recommendations, however the reality on the ground at Murujuga is one of ongoing and extended damage and desecration of what is arguably the world's most significant rock art site. Immediately after the listing, the Minister provided new approvals to extend the operating life of the largest pollution source on Murujuga to 2070, Woodside's North West Shelf extension project, with an accompanying exemption for damage caused by industrial pollution under Australia's Aboriginal heritage laws. Conditions attached to the new approval allow ongoing emissions at levels which the Minister admits will continue to damage the rock art, and many times higher than is required at other similar facilities. While extended impacts from industrial emissions have been guaranteed, assurances provided to UNESCO by the Australian Minister for Heritage have turned out to be unreliable.



Fig. 2: Proximity of the LNG facilities to the Murujuga rock art.
Photo: Save Our Songlines



Fig. 3: An ancient petroglyph, where a ferromanganese layer has formed over the original engraving to show only a contour contrast (centre) and where the right portion of the petroglyph has been removed by flaking of the rock varnish due to chemical processes from industrial emissions.
Photo: K. J. Mulvaney, 2016

The controversy surrounding the Murujuga nomination reflected concerns that have been raised by independent scientists and Traditional Custodians for over 20 years regarding the effects of acidic industrial emissions on the rock art. By 2016, retired museum director Dr. Ian Mcleod said the rock art decay was as 'sure as night follows day'[1]. For years, industry and government regulators had denied and downplayed these impacts, however the growing body of scientific evidence was becoming impossible to ignore. In 2020, Government and industry established a new Murujuga rock Art Monitoring Program (MRAMP), however it would take three years to produce its first report.[2] This found that no site on Murujuga was free from the impacts of industrial pollution, and recommended further research on those impacts.

This finding was inconvenient for government-backed industry operating at Murujuga. Multinational oil and gas companies Woodside, Chevron, BP, Shell, Mitsubishi and Mitsui were seeking environmental approvals to extend the operating life of their giant North West Shelf LNG facility for a further 50 years. The construction of this facility in the heart of Murujuga without the consent of Traditional Owners in the 1980's led to the destruction of an estimated 4-5 thousand of petroglyphs.[3] At the time, the potential for industrial emissions to cause ongoing damage to the remaining rock art was not considered, and later expansions would result in the release by the facility of over 20 tonnes of highly acidic compounds every day into the atmosphere over Murujuga. In addition, the North West Shelf extension was strongly opposed by leading Australian environment groups due to its climate impacts, with Australian Conservation Foundation (ACF) naming it as the largest 'carbon bomb' in the Southern Hemisphere[4] as part of a major public campaign against the proposal.

The long-awaited 2024 MRAMP report provided further damning evidence about the impact of industrial emissions at Murujuga, however government authorities continued to downplay the findings. An executive summary of the report written by the government agency charged with regulating industry omitted key data, and incorrectly claimed that damage to the petroglyphs could be attributed to historical emissions rather than current industry.

This led to an uproar in the scientific community. A senior scientist involved with the study told the Australian Broadcasting

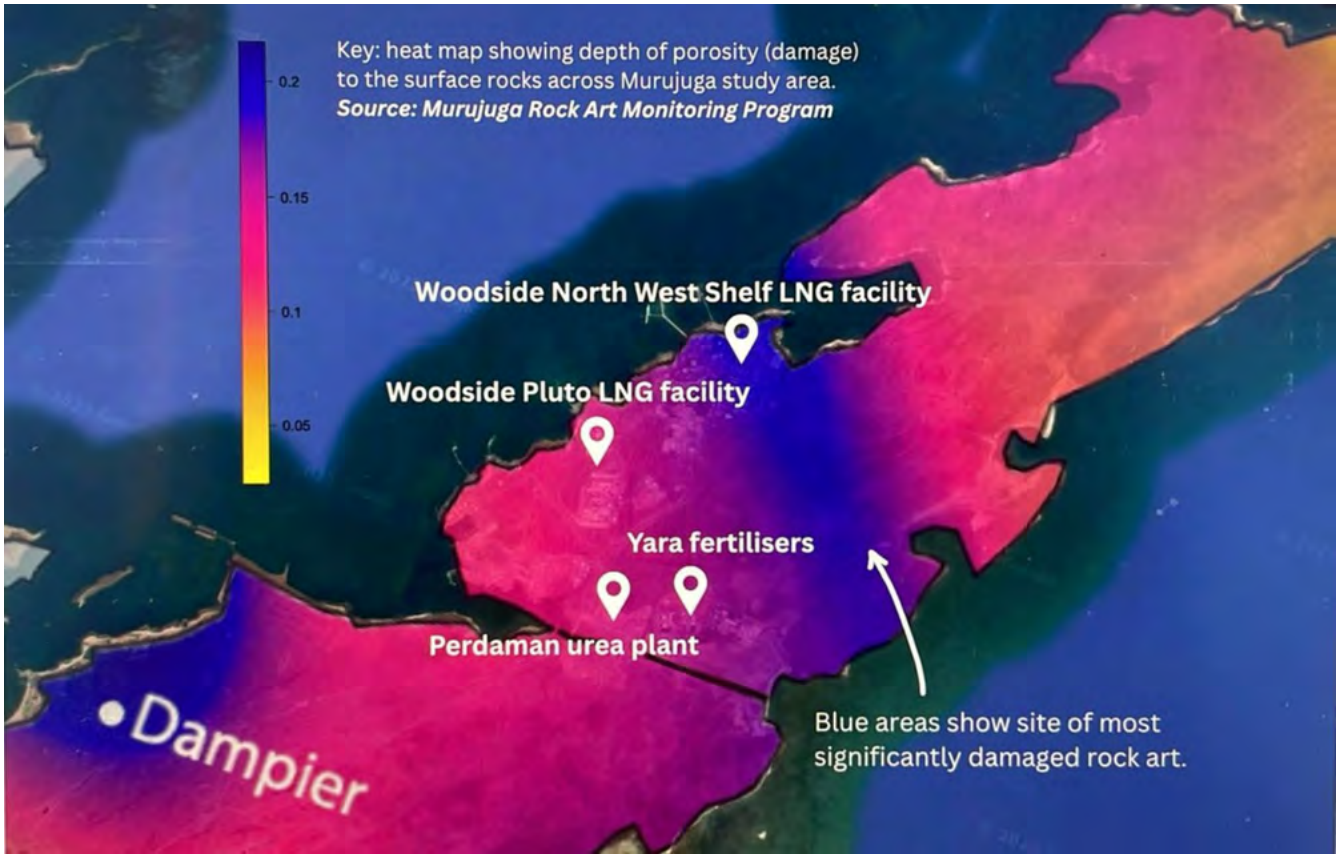


Fig. 4: Murujuga Rock Art Monitoring Program heat map of rock art damage with industrial projects overlaid.
Map: Kelly Warden, see also: https://www.wa.gov.au/government/publications/murujuga-rock-art-monitoring-program-monitoring-studies-report-2024

Corporation (ABC) *"The claim that we established that no further damage is occurring to the rocks is simply false."* [5] Ben Smith, Professor of World Rock Art and President, ICOMOS Scientific Committee for Rock Art accused the government of doctoring the results.[6] Later, the head statistician with the MRAMP project publicly quit, saying the findings were a 'smoking gun' that the government had attempted to cover up[7]. He told the ABC that *"[m]isstating the results of an expensive scientific investigation is unacceptable and I think that's what's happened."*

Despite this controversy, Australia's Minister for the Environment and Heritage Murray Watt embarked on a major international lobbying exercise [8] to ensure that the Murujuga World Heritage bid would not prevent further industrial development on Murujuga. This effort included a 'factual errors' letter to ICOMOS[9] and a series of meetings with ambassadors in the lead up to the Paris meeting. The Minster incorrectly claimed at the time '*the scientific evidence … shows that there is [no] impact and will be no impact from the industrial activity more broadly, not just the North West Shelf project*'[10] and that the MRAMP report "is clear in saying industry can coexist with the rock art, without damaging it."[11] and that the MRAMP report "is clear in saying industry can coexist with the rock art, without damaging it." The Minister briefed UNESCO delegates on the 'strict conditions' that he would place on the North West Shelf extension to protect world heritage values[12]

ICOMOS stood by its findings and recommendations. However, the Minister succeeded in convincing UNESCO to replace the draft resolution with a far weaker one that would accommodate continued industrial operations and new approvals at Murujuga.

Shortly after returning from the Paris meeting, Minister Watt gave his final approval for the North West Shelf extension to continue operating until 2070. The 'strict conditions' promised by the Minister had been dramatically watered down following 'heavy political lobbying' from Woodside[13], which claimed that the expense of pollution control equipment could not be justified. Analysis of the conditions by independent charity Friends of Australian Rock Art indicates that the approval allows ongoing acidic pollution at levels up to 15 times greater than comparable facilities operating in America and elsewhere.

Contrary to the assurances provided by the Australian Government to UNESCO, even the Minister's own Statement of Reasons for the decision to approve the North West Shelf extension[14] confirms that the Murujuga rock art would be exposed to extended and additional impacts from industrial emissions. The

Minister says *"I note that there are multiple lines of scientific and other evidence suggesting that nitrogen oxides (NOx), sulfur oxides (SOx), and other acidic airborne emissions are having a significant adverse impact on the rocks of Murujuga. And "I note the department's advice that the taking of the action, despite proposed avoidance and mitigation measures […], is likely to result in residual impacts to the values of the National Heritage Place"*.

The Minister had also assured UNESCO that Australia's environment and heritage protection laws were 'world leading', however under these laws the Minister was not required to consider the newly inscribed World Heritage listing or the impact of the proposal on the World Heritage values in his decision. In the end, the Minister considered that Woodside's claimed economic benefits of the proposal outweighed the ongoing damage to Murujuga petroglyphs.



Fig. 6: Raelene Cooper pointing at the acidic smoke plume emanating from the North West Shelf LNG Plant. Photo: Save Our Songlines

On the same day that the Minister approved the North West Shelf extension, he also made a declaration under Australia's Aboriginal heritage protection laws (known as a "Section 10 declaration"). This responded to an application submitted over 3 and a half years earlier by Traditional Custodian, Mardathoonera woman and previous Chair of the Murujuga Aboriginal Corporation (MAC) Raelene Cooper together with Save our Songlines (SoS). In a case brought by Cooper, the Federal Court of Australia had previously ruled that the Minister had unlawfully delayed the application with no adequate explanation,[15] finding the Minister's delay was "the consequence of oversight and neglect."[16]

During the period of unlawful delay, chemical and fertiliser corporation Perdaman (which had already removed removed rock art from its construction site on Murujuga [17]) was allowed to destroy a highly significant *Fish Thalu* sacred site to make way for its fertiliser plant. The Minister's Explanatory Note for the *Murujuga Declaration* found that the site warranted federal protection (including because the state legal regime was too weak), but the unlawful delay meant the *Fish Thalu* site was destroyed while Cooper waited for a decision.

The Minister's Statement of Reasons for the M*urujuga Declaration* [18] includes a finding that '*The whole of the specified area [Murujuga] is under threat of injury or desecration on the basis of activities related to industrial emissions from all ongoing and proposed industrial facilities*'. Despite this, impacts of industrial emissions were exempted from the Declaration, ensuring it would not interfere with existing and planned industrial operations at Murujuga.

In a statement, Cooper called the exemption 'offensive':

> *"The Minister has provided an explicit, offensive exemption in my Section 10 Declaration for industry to keep causing damage to the rock art through industrial emissions. It is a deliberate decision by the Minister to further protect industry at the expense of Murujuga's World Heritage rock art. If there is no damage occurring, why is this exemption required? This clearly demonstrates the Government has no confidence in the conditions on Woodside to protect the rock art. Cooper continued "This decision is a slap in the face. It allows Woodside to continue operations and pollution to 2070. It is a crime against Murujuga and a crime against humanity. This is not just destroying Murujuga country, but will impact communities all around the world. It is a shameful act and a shameful decision. It is a betrayal of Aboriginal people, it is a betrayal of our Elders, it is a betrayal of future generations. It is a betrayal of all Australians."*

It is clear that the serious threats and impacts to the Outstanding Universal Values at Murujuga are ongoing, and have been further extended and guaranteed as a result of decisions taken by the Australian Government following the inscription of the site on the World Heritage list. With the expert ICOMOS recommendations largely set aside, there is no plan to remove emissions from the site, to prevent further industrial development, or to develop a decommissioning plan for existing facilities. Management plans for the site elevate the interests of industry over the need to protect the rock art, and the government monitoring program is subject to ongoing concerns regarding interference and manipulation. It has even been suggested that the site's inscription on the World Heritage list has enabled expansion of the very industry that is harming the site in a way that compromised the UNESCO process, with the successful listing (with weakened protections) helping to minimise criticism for the controversial North West Shelf extension approval in Australia. [19]

Efforts by civil society groups and Traditional Custodians to address the threats to Murujuga are continuing in Australia, including through legal challenges to approvals for the North West Shelf extension by charities Friends of Australian Rock Art and ACF.

Save our Songlines strongly supported the draft resolution from ICOMOS regarding the management of industrial threats at Murujuga. SoS calls for those recommendations to be revisited and reinstated by UNESCO and for the site to be recognised on the World Heritage in Danger list until this occurs.

In addition, we call for the following urgent actions by the Australian Government with the support and oversight of UNESCO:

1. Place a moratorium on any further industrial development at Murujuga, including preventing the processing of gas from any new fields at Murujuga.
2. For the processing of remaining gas in fields already under production, ensure all LNG operations at Murujuga are required to install best practice electric-drive systems and/or Selective Catalytic Reduction (SCR) scrubbers to eliminate acid gas emissions within three years. This is not currently required.
3. Develop a decommissioning and rehabilitation plan for all industry on Murujuga in consultation with Traditional Owners.

It is hoped that UNESCO members and civil society organisations around the world will maintain close scrutiny on the management of industrial threats at Murujuga, and support these actions to be implemented as a matter of urgency.

Save our Songlines (SoS) is a group of independent Traditional Owners with ongoing cultural and spiritual connections to Murujuga and cultural responsibility for its protection. Our mission is to protect, practice and preserve culture at Murujuga for future generations. SOS advocates for greater protection of the Ngurra, including rock art, songlines, health, climate and culture from the impacts of inappropriate industrial development.

Notes

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Urgent Need to Reinstate Regular Reporting in the Tasmanian Wilderness

Jimmy Cordwell and Alice Hardinge, The Wilderness Society (Tasmania)

The Tasmanian Wilderness World Heritage Area (henceforth 'Tasmanian Wilderness') is the world's highest-rated World Heritage wilderness and the equal-highest ranked World Heritage property on Earth. It is one of only two World Heritage properties that meet 7 of the 10 World Heritage criteria, namely three cultural criteria (iii, iv and vi), and all four natural criteria. At almost 1.6 million hectares, it covers roughly one fifth of Lutruwita (the Palawa - Tasmanian Aboriginal - name for Tasmania), Australia's southernmost and only island state.

This is an area of wilderness rich in cultural history, a living landscape for Palawa people with a culture enmeshed with species, ecosystems and environmental processes that have evolved since time began. It's a highly remote location – a place with organic soils, water, and skies – which is historically free from the intrusions of rampant industrial activity, covering landforms shaped by a series of glacial-heavy ice ages while much of the island's life stretching through time of Gondwana. This Outstanding Universal Value (henceforth 'OUV') nestled in the bottom pocket of the continent, becomes all the more significant when we consider the rapid rate of wilderness destruction around the world, the multitude impacts of climatic change, and the challenges to and from mismanagement.

Recently, a group of organisations – including the Wilderness Society Tasmania – wrote to the Directors of the World Heritage Centre, the IUCN and ICOMOS. In this we detailed a myriad of threats to the properties OUV, and the role the state party (the Australian government) and the sub-national entity responsible for day-to-day property management, the Tasmanian government, have played in failing stewardship to protect this spectacular landscape.

In the 2025 Conservation Outlook Report for the Tasmanian Wilderness[1], climate change presents a major threat to the OUV of this property. More frequent and more intense fire regimes – as a result of hotter, dryer conditions and more frequent dry lightning strikes - caused by climate change are already threatening globally significant Gondwanan ecosystems within and adjacent to the property, many of which are dependent on the absence of fire or the presence of particular fire regimes. There has been a significant increase in the number of dry lightning strikes, the number of fires from lightning strikes, and the extent of the burnt area in western Tasmania since 1980, with this trend projected to continue. Prior to 2000, 95% of fires were deliberately lit, however since then, lightning strikes have become the primary cause. Since 2000, fire sensitive vegetation communities that will not recover under climate change have been burned in four severe fire seasons.



Fig. 1: Tasmanian Wilderness WHA, devestating burn damage to alpine/subalpine vegetation in 2018/2019 wildfires. Photo: Jimmy Cordwell

Increased fire frequency and intensity are predicted to destroy much of the remaining area of coniferous heathland and montane coniferous rainforest, with catastrophic consequences for flora and fauna species. These ecosystems are considered to contain the richest assemblage of taxa with evolutionary links to taxa that formed the vegetation of the ancient super continent Gondwana, including the King Billy pine (Athrotaxis selaginoides), Myrtle beech (Nothofagus cunninghamii), Huon Pine (Lagarostrobos franklinii), Pencil Pine (A. cupressoides), and more than 14 other genera of national or international significance. These climate change driven changes to the fire regime are compounding changes to fire management practices since the Palawa were forcibly removed from the land. Frequent small burns were no longer carried out, resulting in less frequent small burns, and more extensive large fires.

This World Heritage site has major spiritual and cultural importance for Palawa, Tasmanian Aboriginal people, the original owners of Lutruwita/Tasmania. There is an absence of any progress towards returning any management responsibility, let alone land, to Palawa. For example, the Comprehensive Cul-

1 https://worldheritageoutlook.iucn.org/explore-sites/tasmanian-wilderness

tural Survey which the state and subnational parties committed to in response to the 2015 RMM (Recommendation 13), remains outstanding and without any substantive progress. Further, there has been no undertaking in relation to joint management with the Tasmanian Aboriginal Community (RMM Recommendation 20).

Further, the assessment of Governance arrangements as mostly effective, does not adequately reflect the commentary contained in the report which recognizes that Aboriginal involvement in decision-making processes could be further strengthened. There is no shared decision making with Tasmanian Aboriginal representative bodies and no co-design or free, prior and informed consent sought for Aboriginal heritage projects or activities in the Tasmanian Wilderness, as required under the UN Declaration on Rights of Indigenous Peoples, endorsed by Australia in 2009. Further, the recognition of the role of cultural burning by the Fire Management Plan has failed to result in any cultural burning being undertaken in the Tasmanian Wilderness. There are no community led or designed cultural fire projects in development, instead the state has created its own 'cultural fire' unit that seeks to imitate cultural practices without community involvement.

At the 80th Session of the UN General Assembly, in the Report of the Special Rapporteur on the human right to a clean, healthy and sustainable environment, it was reported that industrial salmon farming in Tasmania has never been subject to an Environmental Impact Assessment (EIA) under Australian law, despite its proximity and impacts on nearby World heritage values[2], especially given the imminent threat of extinction of the Maugean skate. The Australian Government communication with UNESCO on this topic has been misleading.

The 44th session of the World Heritage Committee reiterated to Australia the importance of carrying out impact assessments, and urged submission to the Committee, for review by the Advisory Bodies, details of any project that may affect the property's Outstanding Universal Values, in accordance with Paragraph 172 of the Operational Guidelines. In the case of fish farming adjacent to the Tasmanian Wilderness, no such assessment has been undertaken.

As the 2025 Conservation Outlook Report notes, the increased spread of damage from feral deer due to the porous nature of the boundary, and the lack of resources to manage the wild population across multiple tenures, means that some OUV are under increased threat.

Biosecurity was highlighted already in the 2015 Reactive Monitoring Mission (RMM recommendations 18 and 19) as a major concern and management priority. However, the actions of State Party and subnational entities on biosecurity, especially feral deer, remain inadequate in relation to the extent and severity of environmental impacts.

The most recent State Party Report on the State of Conservation of the Tasmanian Wilderness (2022) and the subsequent update (2023) makes no mention of invasive deer, invasive species, or biosecurity, despite the increasing threat these issues pose to the Outstanding Universal Value of the property, especially in the face of climate change. As long as invasive deer remain protected (as a 'game species') in the adjacent region, and without a long-term commitment of adequate resourcing, Australia will fail to meet its obligations to protect the site.

During the UN Decade of Ecosystem Restoration, the restoration of the flooded Lake Pedder – a 10km² lake submerged under a hydroelectric reservoir 240km² in size - should be a priority. The lake was included in the Tasmanian Wilderness on the basis that it would one day be restored. However, State parties and sub-national entities are ignoring timely and salient calls for restoration, and despite the aging dam infrastructure, have instead commenced major works on the dam infrastructure. The restoration of the lake requires open debate and discussion, yet a lack of accountability of the State party and subnational entity is further hampering this discussion from occurring.



Fig. 2: Lake Pedder before damming. Photo: The Wilderness Society



Fig. 3: Lake Pedder after damming. Photo: The Wilderness Society

We request that the state of conservation reporting must be reinstated for the Tasmanian Wilderness. As we know, management considerations involve a swathe of stakeholders; in the case of the Tasmanian Wilderness, the list is extensive.

2 https://documents.un.org/doc/undoc/gen/n25/193/14/pdf/n2519314.pdf

Hawai'i Volcanoes National Park Honours a Man Who Helped to Overthrow the Hawaiian Kingdom

Alexander Kalauokalani Pe'a

Why is one of Hawai'i's most sacred natural places still publicly honoring Lorrin A. Thurston?

Nāhuku[1] already had a name before Thurston. It did not need to be "discovered." Long before tourists walked through the lava tube, long before the National Park existed, Nāhuku was already known through *'ike kūpuna*, through Hawaiian language, through relationship to the land itself.

Yet today, one of Hawai'i's most sacred natural places still carries the name of a man who helped dismantle Hawaiian self-governance. Lorrin A. Thurston was not a neutral historical figure. He helped author the 1887 Bayonet Constitution, imposed under armed threat against King Kalākaua. That constitution stripped political power from many Hawaiians while empowering wealthy foreign business interests.



Fig. 1: A panel inside the Hawai'I Volcanoes National Park calls Nāhuku after L. Thurston, an anti-Hawaiian ideologue and political lobbyist.
Photo: Alexander Kalauokalani Pe'a

He later helped organize the overthrow of the Hawaiian Kingdom government and spent years advocating for annexation and aggressive Americanization. One of the most revealing statements associated with Thurston was his claim that Native Hawaiians were "unfit for self-government."

That claim was never rooted in reality. At the time, Hawai'i already had:

- a constitutional monarchy,
- treaties with major world powers,
- over 90 consulates,
- an internationally recognized government,
- and one of the highest literacy rates in the world.

The argument was rooted in the racial paternalism used by imperial powers throughout the nineteenth century.

And that is what makes the sign at Nāhuku feel so historically surreal. You have this deeply Hawaiian name, born from the land itself, sitting beside the name of a man who openly believed Hawaiians were unfit to govern their own country.

Nāhuku is not just a "location." In Hawaiian worldview, the *'āina* (land) is alive and relational. Place names carry memory, genealogy, environmental knowledge, and ancestral connection.

Nāhuku is a living Hawaiian name. A name from Pele's realm.[2] A name spoken generations before Thurston ever entered Hawaiian politics.

Yet Thurston became one of the principal architects, arguably the chief ideological architect, of the Republic of Hawai'i, the same regime that imposed the 1896 English-only school law that devastated the Hawaiian language for generations. Chil-

1 Nāhuku, a lava tube located in the Hawai'i Volcanoes National Park, was formed by a hollow molten lava stream, leaving behind an empty cave once the lava flow stopped and cooled.

2 Pele is considered the goddess and guardian of fire, and especially the Hawaiian Volcanoes, and is believed to live inside the mountains but sometimes appear in the material world. There is a group of Native Hawaiians who are widely considered to be "Pele descendants", implying that there is a lineage that can be traced back to Pele.



Fig. 2: Inside the Nāhuku Lava Tube. Photo: Hawai'i Volcanoes NP / D. Boyle

dren were punished, shamed, and beaten in schools for speaking Hawaiian. Think about that contradiction.

The man whose political movement helped suppress the Hawaiian language still has his name attached to one of Hawai'i's most sacred Hawaiian places. You cannot celebrate the Merrie Monarch (Hawaiian King Kalākaua) on one side of the island while honoring Lorrin Thurston on the other.

This is the same man connected to the movement that forced bayonets upon King Kalākaua, the very king the Merrie Monarch Festival exists to honor. Hawai'i really said: "Let's celebrate the king… and keep monuments to the man who held him at gunpoint." That contradiction is historically insane. Imagine another country honoring the name of a man associated with the overthrow of its government at one of its sacred cultural sites.

The cave's true name is Nāhuku. The land does not need Thurston's name to matter.

If enough people respectfully speak up, change becomes possible. Contact Hawai'i Volcanoes National Park: (808) 985-6000 havo_information@nps.gov
Tell them: "Nāhuku should be known by its Hawaiian name, not the name of a man associated with the Bayonet Constitution and the overthrow of the Hawaiian Kingdom government."

Because '*āina* (the land) remembers its name. And maybe it is time we do, too. Nāhuku endured. The language endured. The people endured. And in the end, that endurance may outlast every sign ever placed there.

Commercial Fishing Threatens Papahānaumokuākea, Hawai'i's Largest Marine Protected Area

J. Hau'oli Lorenzo-Elarco, Kenika Lorenzo-Elarco, Pelika Andrade, Kekuewa Kikiloi, Kaipulaumakaniolono Keala, & Kanoe Morishige on behalf of the Papahānaumokuākea Native Hawaiian Cultural Working Group

Papahānaumokuākea, also known as Papahānaumokuākea National Marine Sanctuary (PNMS), is a UNESCO World Heritage Site that spans the Northwestern region of the Hawaiian Islands from Nihoa to Hōlanikū and up to 200 nautical miles from the shores of these islands, covering three-quarters of the Hawaiian archipelago and over 582,000 square miles.

The area includes terrestrial and marine habitats from steep cliffs to low-laying atolls, pelagic to deepwater environments, seamounts to submerged banks, and extensive coral reefs to lagoons. These critical habitats are home to several endangered, endemic, and culturally important species such as sea turtles, monk seals, ancient corals, cetaceans, sea birds, and passerines.

Of great cosmogonic importance, Papahānaumokuākea is the ancestral homeland of the *Kānaka* (Native Hawaiians), and the place to which we return when we leave the physical world. Two islands within Papahānaumokuākea also include archaeological remains of pre-European contact and use by Native Hawaiian ancestors.

As a *pu'uhonua kapu* (sacred place of refuge) for millennia, a marine national monument since 2006, a UNESCO World Heritage Site since 2010, and a national marine sanctuary since early January 2025, Papahānaumokuākea has been governed under strong protective mechanisms. Commercial fishing has been prohibited within the monument since its establishment, ensuring the protection of its natural and cultural resources, vulnerable ecosystems, more than 7,000 species, and the attributes that convey its Outstanding Universal Value.[1]

The threat of commercial fishing

Six months after sanctuary designation, Papahānaumokuākea is threatened by extractive commercial fishing, economic pressures, and American politics. Recent federal proclamations and executive directives signal a broader policy shift toward expanding commercial fishing access in U.S. Pacific waters, including areas previously subject to strict conservation protections. Public statements and actions by federal authorities and regional fisheries bodies indicate possible consideration of reopening

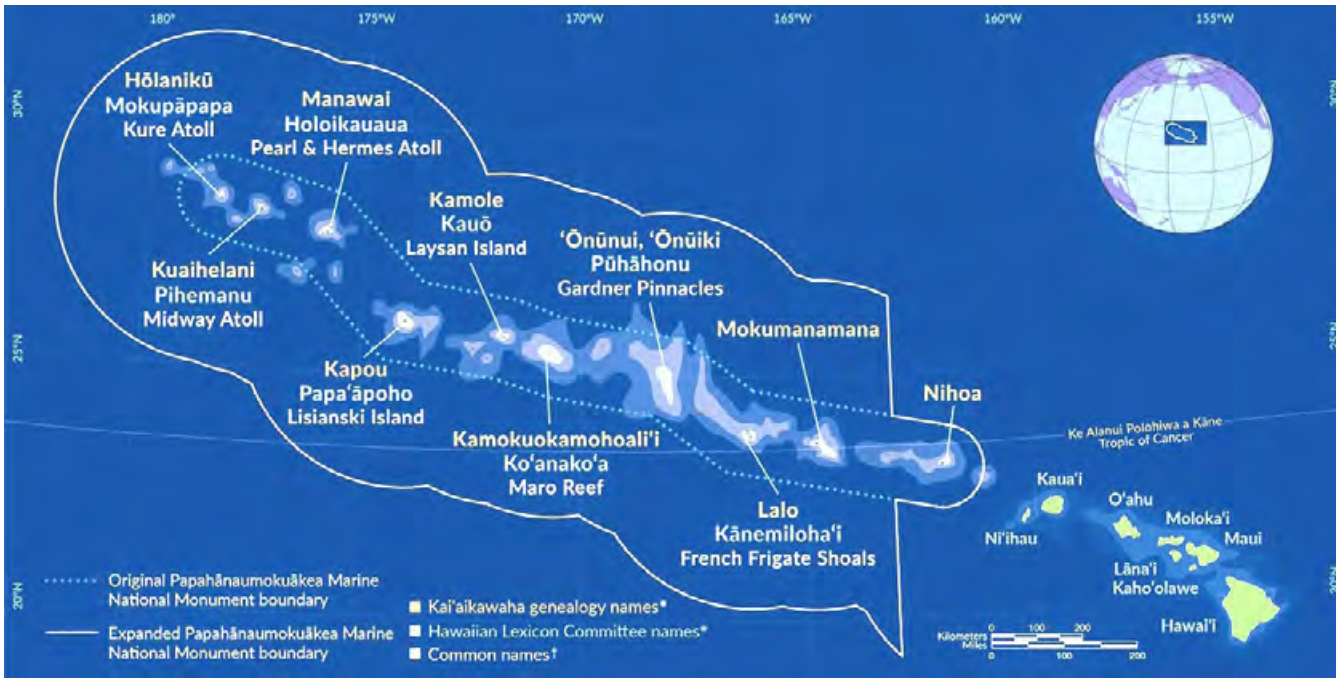


Fig. 1: Papahānaumokuākea

Map: US National Oceanic and Atmospheric Agency

highly protected marine areas to extractive activity, raising concern about the long-term durability of existing safeguards for Papahānaumokuākea.

On April 17, 2025, President Donald Trump signed the proclamation "Unleashing American Commercial Fishing in the Pacific,"[2] allowing commercial fishing in parts of the Pacific Islands Heritage Marine National Monument in the Central Pacific, one of the largest marine protected areas in the world. Following that proclamation, commercial fishing activities resumed in waters surrounding Kio (Wake) Island, Kalama (Johnston) Atoll, and Paukeaho (Jarvis) Island.

Shortly thereafter, Trump issued Executive Order 14276 "Restoring American Seafood Competitiveness,"[3] directing federal agencies to slash commercial fishing regulations in areas with heightened conservation measures, such as Papahānaumokuākea, to boost domestic production and combat foreign trade of the American seafood industry.

On June 12, 2025 and in subsequent meetings and public statements since, WESPAC publicly reaffirmed their intention to open Papahānaumokuākea to commercial fishing and is slated to ask the United States President to do so.[4] This is not an abstract worry. It's an immediate threat.

These actions reflect a policy emphasis on national fishing access within federally managed waters. However, Papahānaumokuākea's status as a World Heritage site and pu'uhonua kapu established conservation and cultural obligations that warrant careful international review before any alteration of existing protections.

Pre-prohibition impacts

Prior to its prohibition, commercial fishing in Papahānaumokuākea crashed the lobster and bottom fish populations due to overextraction, which subsequently led to the decline in monk seal population.[5] In 2000, the manō (shark) population in Papahānaumokuākea was ravaged by a single commercial fishing vessel that killed 990 manō in just 21 days.[6]

Although commercial fishing is still banned in Papahānaumokuākea, it remains vulnerable and highly impacted by the byproducts of global commercial fishing exploitation, as it has become a collection point for the world's marine debris.

Lost fishing materials entangle corals, litter habitats, and choke wildlife. Since 2020, the Papahānaumokuākea Marine Debris Program (PMDP) has removed over one million pounds of marine debris from Papahānaumokuākea, much of it fishing-related.[7] The clean-up continues.

Benefits of marine protected areas

Fishing prohibitions within Papahānaumokuākea actually benefit the fishing industry. Between 2014 and 2017, Hawaiian longline tuna revenue rose by 13.7% compared to 2010–2013, contradicting dire predictions of huge economic losses.[8] Vessels are able to catch more fish while traveling similar distances without needing to journey into Papahānaumokuākea.

A research study published in 2022 on the "spillover effects" of marine protected areas found that *'ahi* (tuna) catches increased by 54% in fishing grounds adjacent to Papahānaumokuākea.[9] Other studies affirm the importance of establishing marine protected areas as a means of boosting fish stocks and creating sustainable local fisheries outside of protected areas.[10]

Protecting the Sacred, Protecting the environment for future generations

For over 20 years, grounded in a deep living pilina (relationship) of genealogy, cultural protocol, research, and stewardship, the Papahānaumokuākea Native Hawaiian Cultural Working Group (CWG) has been the most active Native Hawaiian group working to protect Papahānaumokuākea.[11] Both the CWG and co-trustee of PNMS the Office of Hawaiian Affairs staunchly oppose commercial fishing in Papahānaumokuākea.[12]

One of the core goals of Papahānaumokuākea's management plan is to maintain ecosystem integrity – but that goal cannot be met if commercial fishing targets key species for profit.

The late Kawika Kapahulehua (CWG member) always reminded us, *"Inā mālama ʻoe i ke kai, mālama nō ke kai iā ʻoe. Inā mālama ʻoe i ka ʻāina, mālama nō ka ʻāina iā oe."* (If you care for the ocean, the ocean will care for you. If you care for the land, the land will care for you.) However, our actions must extend beyond *mālama* (stewardship); we must kiaʻi (protect) Papahānaumokuākea against commercial fishing and other extractive practices.

As CWG member and founding NOAA (National Oceanic and Atmospheric Administration) Papahānaumokuākea superintendent ʻAulani Wilhelm recalls, "People would ask, 'What are you protecting it [Papahānaumokuākea] from?' And our answer was, 'That's the wrong question. It's about who and what are we protecting it for.'"

On March 24, 2026, despite massive opposition and historical environmental abuses, the Western Pacific Regional Fishery Management Council (WESPAC) voted to restore commercial fishing in culturally and ecologically vital ocean areas across Moananuiākea (the Pacific Ocean) including Papahānaumokuākea,

Annex: Photographic documentation of the damage caused to Papahānaumokuākea by commercial fishing

All photos courtesy of the Papahānaumokuākea Marine Debris Project



Fig. 1: A discarded commercial fishing net suffocates coral in Papahānaumokuākea.



Fig. 2: A native noio (Black Noddy, Anous minutus) sits on entangled nets over a dying coral reef system in Papahānaumokuākea.



Fig. 3: A crew member of PMDP works to remove large fishing nets from coral.



Fig. 4: This endangered and endemic ʻīlioholoikauaua (monk seal) was later freed after it was found entangled in fishing nets.



Fig. 5: Members of PMDP cutting nets away from an entangled honu (green sea turtle). Papahānaumokuākea is the largest nesting site for honu in Hawaiʻi.

Pacific Islands Heritage (PIH), Muliava (Rose) Atoll, and Marianas Trench Marine National Monuments. Specifically, for Papahānaumokuākea, they voted to open its 3,200 nautical miles (nm) area for bottomfish and pelagic fisheries. Though this was expected from the WESPAC vote, the outcome does not yet make commercial fishing legal. There are still several steps and consultations that are lawfully required. We are continuing to organize and remain vigilant to ensure commercial fishing does not gain any legal ground, and that our oceans protected in perpetuity – for the benefit of our grandchildren.

Recommendations

In the spirit of protecting Papahānaumokuākea for the benefit of future generations, we ask that UNESCO consider the following actions:

1. Formally and publicly inform and express concerns on the threat of commercial fishing in Papahānaumokuākea to the State Party
2. Utilize reporting mechanisms to formally conduct, review, and comment on commercial and extractive threats on the natural and cultural resources of Papahānaumokuākea.
3. Proclaim resolutions that recognize the natural and cultural importance of Papahānaumokuākea as a marine protected area and UNESCO World Heritage site and implore its long-lasting protections against commercial fishing and other extractive activities.

Notes

1 Papahānaumokuākea, UNESCO, https://whc.unesco.org/en/list/1326/.

2 U.S. Presidential Proclamation, Unleashing American Commercial Fishing in the Pacific, (April 17, 2025), https://www.whitehouse.gov/presidential-actions/2025/04/unleashing-american-commercial-fishing-in-the-pacific/.

3 U.S. Presidential Executive Order, Restoring American Seafood Competitiveness, (April 17, 2025), https://www.whitehouse.gov/presidential-actions/2025/04/restoring-american-seafood-competitiveness/.

4 Press Release, Western Pacific Regional Fishery Council, Press Release-Fishing Prohibitions Unfair: Council Pushes for Analysis of Fishing in Marine Monuments (December 16, 2025) https://www.wpcouncil.org/press-release-fishing-prohibitions-unfair-council-pushes-for-analysis-of-fishing-in-marine-monuments-16-december-2025/.

5 Office of National Marine Sanctuaries, Papahānaumokuākea Marine National Monument Condition Report 2009. (2009) U.S. Department of Commerce, National Oceanic and Atmospheric Administration, Office of National Marine Sanctuaries, Silver Spring, MD. at pp. 17.

6 Ibid., pp. 178

7 https://www.pmdphawaii.org/

8 Lynham, John et al., Nature Communications, Impact of two of the world's largest protected areas on longline fishery catch rates (2020).

9 Medoff, Sarah et al., Science, Spillover benefits from the world's largest fully protected MPA (Oct. 21, 2022).

10 Lynham, John et al., (2020).

11 www.alohacwg.com

12 Press Release, Office of Hawaiian Affairs & The Papahānaumokuākea Native Hawaiian Cultural Working Group, Support for Papahānaumokuākea as Marine Monument and Sanctuary (June 20, 2025), https://www.oha.org/news/support-papahanaumokuakea-marine-sanctuary/.

V. Natural Properties

Islands and Protected Areas of the Gulf of California: DSOCR Criteria Are Still Unmet

Alejandro Olivera on behalf of the Center for Biological Diversity, the Animal Welfare Institute, Environmental Investigation Agency, and the Natural Resources Defense Council

The vaquita porpoise remains the most acute Outstanding Universal Value (OUV) – related emergency for the Islands and Protected Areas of the Gulf of California World Heritage property ("the Site"). The latest 2025 survey results continue to estimate the vaquita population in single digits.[1] Although the remaining animals appear capable of reproduction, extinction risk remains unacceptably high so long as gillnet fishing persists in the Vaquita Refuge including the Zero Tolerance Area (ZTA), and adjacent waters.[2]

Gillnets have been the principal driver of vaquita decline; accordingly, recovery is only plausible if Mexico ensures a sustained, verifiable gillnet-free habitat and prevents the re-entry of legal or illegal gillnet fishing effort into vaquita habitat.[3,4] As detailed below, Mexico has not yet met the Desired State of Conservation for Removal indicators adopted in 2024, and the Site should remain on the In-Danger list:



Fig. 1: A deceased vaquita killed by a gillnet used for catching totoaba.
Photo: Omar Vidal / NOAA Fisheries West Coast

DSOCR and continuing "In Danger" status

At its 46th session, the World Heritage Committee approved the Desired State of Conservation for Removal (DSOCR) and retained the Site on the List of World Heritage in Danger.[5] The adopted DSOCR indicators include:

a) adoption of legal fishing gear not entangling protected species;

b) vaquita population increase for at least five years with healthy calves;

c) effective protection from illegal fishing through surveillance and prosecution;

d) the Vaquita Refuge and relevant marine reserve areas free of illegal gear and elimination of gillnet use/sale/possession/manufacture/transport; and

e) systematic international cooperation to combat totoaba poaching and trafficking.[6]

At its 47th session, the Committee again retained the Site on the List of World Heritage in Danger, reiterated that illegal totoaba fishing continues, urged strengthened prosecution and penalties, and urged implementation of vessel monitoring systems (VMS) and other technologies to complement enforcement. The Committee also requested additional details on proposed gas development/transport infrastructure near the property and an Environmental and Social Impact Assessment (ESIA) prior to any difficult-to-reverse decisions.[7]

Evidence of ongoing illegal fishing risk and insufficient enforcement

Gillnet-fishing persists in the broader Vaquita Refuge. Sea Shepherd Conservation Society (SSCS)[8] daily monitoring outputs for 2025 document repeated clusters of small boats in the Vaquita Refuge and associated indications of net-fishing behavior. On April 12, 2025, SSCS reported that five small boats were confirmed net fishing by drone and that small-boat counts in the Vaquita Refuge reached 25 in a single hour.[9] On March 7, 2025, SSCS recorded up to 20 small boats in the Vaquita Refuge within a single hour, with some recorded as net fishing earlier that evening.[10] On March 16, 2025, SSCS reported that activity "remained steady" with confirmed net fishing between 11:00 and 13:00, including multiple boats logged as net fishing during those hours.[11]

Active illegal gillnets continue to be detected and removed, underscoring continuing risk. SSCS also documented active illegal gear and rapid response by Mexican authorities. In an April 2025 incident, SSCS reported detecting an active illegal net of approximately 800 meters drifting in the Vaquita Refuge, notified the Mexican Navy, and subsequently reported interception actions on shore at San Felipe after fishers attempted to flee.[12] In May 2025, SSCS reported detection of an 800-meter net drifting in the northwest quadrant of the ZTA, followed by retrieval later that day by the Navy.[13]

Entering the January–April 2026 totoaba season, SSCS emphasizes that illegal fishing pressure rises sharply and that fishing often occurs at night or during lapses in patrol coverage—reinforcing that intermittent enforcement is insufficient.[14]

Government enforcement actions demonstrate continuing scale of the threat—yet do not establish a durable gillnet-free condition. Under Mexico's September 2020 Agreement,[15] only designated embarkation/disembarkation sites may be used for legal landings and inspection, and the San Felipe Malecón ramp is not authorized under that framework. In October 2025, the Baja California Congress documented "verification actions" by PROFEPA and CONAPESCA (supported by SEMAR) – prompted by continued attempts to use the Malecón ramp for landings/launches despite the prohibition – that reaffirmed this status and restated that fishers should use the authorized sites.[16] These persistent implementation and governance tensions around embarkation and disembarkation sites create predictable enforcement gaps that facilitate illegal effort and complicate sustained compliance.

Mexico's January 2026 SOC[17] reports intensified enforcement metrics, including 6,992 vessel inspections (2023–31 Dec 2025), seizure of 55,710 meters of prohibited nets, 33 investigation files resulting in prison sentences for 17 individuals, and 114.5 million pesos in reparations, alongside proposed Penal Code reforms.[18] While these actions are relevant, they do not – on their own – demonstrate the DSOCR requirement of a sustained, verifiable gillnet-free habitat and durable deterrence measurable through transparent, repeat-offender outcomes and independent verification.

Vaquita status: single-digit abundance with evidence of reproduction is not recovery

The latest 2025 vaquita survey shows the vaquita population is still extremely small. Researchers saw at least 7 vaquitas, and they believe the total number is probably fewer than 10 animals. The report also notes that at least one – and possibly two – calves were seen, along with a juvenile, which indicates that vaquitas are still reproducing.[19,20] While successful vaquita reproduction provides a glimmer of hope, it is not sufficient: at the vaquita's current abundance, the loss of even one animal to a gillnet can materially shift extinction probability. Accordingly, a population that is "not declining" does not meet the DSOCR requirement of a consistent population increase over five years.[21]

International processes and enforcement accountability

CEC (USMCA) factual record. Following a multiple-year investigation, the Commission for Environmental Cooperation (CEC)[22] published a Factual Record regarding Mexico's enforcement of vaquita-related protections in August 2025.[23] The Record concludes that Mexico's claimed enforcement actions are "undermined or not supported" by on-the-ground observations; interviews and eyewitness accounts indicate fishing continues at similar levels and with the same gear as before the 2020 restrictions; fishers "elude" bans by routing catch to processors outside the region; and Mexico did not provide sufficient information to resolve key enforcement questions. These findings are directly relevant to the DSOCR: gillnet risk persists outside core enforcement areas and key measures remain uneven at scale.

Mexico's January 2026 SOC[24] reports that the Small Vessel Satellite Monitoring System (SISLEM) is now installed on all small vessels in the San Felipe area, as a tool to strengthen surveillance and better target enforcement efforts against illegal activities. However, vessel-level data and independent verification of full coverage, continuous transmission, and enforcement outcomes are not publicly available, and monitoring systems oriented to permitted fleets do not address unregistered/illegal pangas operating outside compliance frameworks.

Assessment against DSOCR indicators: not yet met

Based on available evidence and the Committee's own findings, Mexico has not yet met the DSOCR indicators adopted in 2024 (see Fig. 2):

Actions needed (2026 priorities)

The World Heritage Committee and Advisory Bodies should insist that Mexico verify compliance with all DSOCR prior to any discussion of removal of the property from the In-Danger list and require the next State of Conservation report to include a DSOCR compliance matrix (indicator-by-indicator) containing objective and auditable evidence. They should also require transparent reporting sufficient to verify active VMS coverage for all registered pangas and a credible strategy to detect/deter unregistered/illegal pangas, and shift enforcement reporting from "nets removed" to deterrence demonstrated (prosecutions, sanctions, repeat-offender outcomes). Finally, they should apply the Committee's project-risk tools by requiring Paragraph 172-style notification and ESIA review for any major energy/transport proposals that could affect the property's OUV before irreversible decisions are taken.

DSOCR indicator (adopted 2024)	Status	Key rationale (summary)
a) Alternative gear adoption	Not yet met	Mexico reports that ECOFT was reactivated in 2025 and that a short-, medium-, and long-term plan is being developed to test and scale alternative gear and non-net fisheries (including evaluation of a modified 35-foot shrimp net).[25] However, the DSOCR requires demonstrable, sustained adoption of non-entangling gear at scale across the fishery footprint—not planning or pilots alone.
b) Vaquita population increasing for at least five years	Not yet met	Current single-digit abundance does not demonstrate the required multi-year increase; the population remains highly vulnerable to any gillnet bycatch.[26]
c) Effective protection from illegal fishing via surveillance and prosecution	Not yet met	Illegal fishing persists, and recent documentation continues to emphasize the need for stronger on-water enforcement, effective surveillance, and credible investigations and prosecutions that meaningfully deter totoaba-driven gillnet use.[27]
d) Vaquita Refuge free of illegal gear and elimination of gillnets	Not yet met	Ongoing net retrieval and repeated vessel presence in/around the refuge remain incompatible with a verified gillnet-free habitat and full gillnet eradication.[28] Mexico's own SOC[29] reports the seizure and destruction of 55,710 meters of ghost nets between April 2023 and December 2025 (including 22,340 meters removed during 2025), which by definition indicates continuing presence of illegal/derelict gillnet gear within the management area.
e) Systematic international cooperation against totoaba trafficking	Not yet met	Although cooperation frameworks are referenced, ongoing trafficking incentives and persistent illegal totoaba fishing indicate cooperation remains incomplete in practice.[30]

Fig. 2: Assessment of Mexico's progress against the DSOCR indicators for removal of the Islands and Protected Areas of the Gulf of California from the List of World Heritage in Danger (2025–2026 update)

Notes

1 Cárdenas-Hinojosa, G., Rojas-Bracho, L., & Taylor, B. L. (2025). Report of the vaquita acoustic and visual survey 2025 (English). IUCN SSC Cetacean Specialist Group. https://iucn-csg.org/wp-content/uploads/2025/11/Report-vaquita-acoustic-and-visual-survey-2025-EN-Nov-11-clean-FINAL.pdf

2 Id.

3 International Whaling Commission. (2023). A statement from the Scientific Committee of the International Whaling Commission on the vaquita

4 Decision 46 COM 7A.43

5 Decision 46 COM 7A.43

6 Decision 46 COM 7A.43

7 Decision 47 COM 7A.5

8 Sea Shepherd Conservation Society (SSCS) is an international nongovernmental organization that, in the Upper Gulf of California, has conducted monitoring and net-removal support activities in coordination with Mexican authorities and publishes regular public "Daily Science Reports" documenting observed vessel activity and gear detections in vaquita habitat.

9 Id.

10 Sea Shepherd Conservation Society. (2025b, March 7). SSCS – Daily Science Report (Ship: M/V Seahorse). https://seashepherd.org/wp-content/uploads/2025/03/SH_Daily-Science-Report_07032025.pdf

11 Sea Shepherd Conservation Society. (2025a, March 16). SSCS – Daily Science Report (Ship: M/V Seahorse; Date: 16/03/2025) [PDF]. https://seashepherd.org/wp-content/uploads/2025/03/SH_Daily-Science-Report_16032025.pdf

12 Sea Shepherd Conservation Society. (2025b, April 15). Sea Shepherd triggers swift net seizure. https://seashepherd.org/2025/04/15/sea-shepherd-triggers-swift-net-seizure/

13 Sea Shepherd Conservation Society. (2025c, May 15). 800-meter net detected and removed in a single morning. https://seashepherd.org/2025/05/15/800-meter-net-detected-and-removed-in-a-single-morning/

14 Ben. (2026, January 20). Defending the Vaquita Refuge During Totoaba Season. Sea Shepherd Conservation Society. https://seashepherd.org/2026/01/20/defending-the-vaquita-refuge-during-totoaba-season/

15 ACUERDO por el que se regulan artes, sistemas, métodos, técnicas y horarios para la realización de actividades de pesca con embarcaciones menores y mayores en Zonas Marinas Mexicanas en el Norte del Golfo de California y se establecen sitios de desembarque, así como el uso de sistemas de monitoreo para tales embarcaciones. 24/09/2020. Available at: https://www.dof.gob.mx/nota_detalle.php?codigo=5601153&fecha=24/09/2020#gsc.tab=0

16 Congreso del Estado de Baja California. (2025, October 23). Diario de Debates (discussion of the cierre de facto of the Malecón ramp in San Felipe and federal verification actions under the 2020 Upper Gulf measures) https://www.congresobc.gob.mx/Documentos/Parlamentarias/Diario/20251023doa1.pdf

17 Islands and Protected Areas or the Gulf of California. State of Conservation Report 2026

18 Islands and Protected Areas or the Gulf of California. State of Conservation Report 2026

19 Cárdenas-Hinojosa, G., Rojas-Bracho, L., & Taylor, B. L. (2025). Report of the vaquita acoustic and visual survey 2025 (English). IUCN SSC Cetacean Specialist Group. https://iucn-csg.org/wp-content/uploads/2025/11/Report-vaquita-acoustic-and-visual-survey-2025-EN-Nov-11-clean-FINAL.pdf

20 Id.

21 Decision 46 COM 7A.43

22 The Commission for Environmental Cooperation (CEC) is the intergovernmental body created under the North American environmental side agreement to the USMCA to promote regional environmental cooperation and to review "Submissions on Enforcement Matters" alleging a Party's failure to effectively enforce its environmental laws.

23 Commission for Environmental Cooperation. (2021). Mexico's failure to enforce its environmental laws for the critically endangered vaquita porpoise: Submission on Enforcement Matters (SEM-21-002)

24 Islands and Protected Areas or the Gulf of California. State of Conservation Report 2026

25 Islands and Protected Areas or the Gulf of California. State of Conservation Report 2026

26 Cárdenas-Hinojosa, G., Rojas-Bracho, L., & Taylor, B. L. (2025). Report of the vaquita acoustic and visual survey 2025 (English). IUCN SSC Cetacean Specialist Group. https://iucn-csg.org/wp-content/uploads/2025/11/Report-vaquita-acoustic-and-visual-survey-2025-EN-Nov-11-clean-FINAL.pdf

27 Decision 47 COM 7A.5 and Decision 46 COM 7A.43

28 Sea Shepherd Conservation Society. (2024a, October 28). Two giant nets pulled in a day to protect the vaquita; Sea Shepherd Conservation Society. (2024b, November 2). SSCS – Daily Science Report: October 20–November 2, 2024

29 Islands and Protected Areas or the Gulf of California. State of Conservation Report 2026

30 Decision 47 COM 7A.5 ; (WHC/25/47.COM/7A.Add).

Strategic Environmental Assessment and LNG in the Gulf of California

Defensa Ambiental del Noroeste and the Center for Biological Diversity

Inscribed on the World Heritage List in 2005 for its Outstanding Universal Value (OUV), the Islands and Protected Areas of the Gulf of California are recognized for exceptional marine biodiversity and critical habitats for endangered and migratory species. Despite repeated calls by the World Heritage Committee for a **precautionary approach**, the property is facing increasing pressure from a range of large-scale liquefied natural gas (LNG) projects and associated infrastructure, at a time when the site is already under acute stress due to the conservation crisis of the vaquita marina.

These LNG projects — including Saguaro LNG, Vista Pacífico LNG, and AMIGO LNG[1] — together with associated pipelines and increased large-vessel traffic, form an emerging, functionally integrated gas export corridor linking Texas, the Gulf of California, and Asian markets, with impacts extending beyond individual project footprints. Public statements by the project proponent indicate an intention to cancel the Vista Pacífico LNG project. However, at the time of writing, no administrative resolution concluding the federal environmental impact assessment procedure is publicly available.

To date, international attention has largely focused on species-specific measures for the vaquita marina[2], while broader cumulative and systemic impacts associated with LNG development and increased shipping across the property and its wider setting have not been comprehensively assessed. Environmental reviews remain fragmented and project-based, and the absence of a Strategic Environmental Assessment (SEA) raises serious concerns about the compatibility of large-scale industrialization with the property's integrity and World Heritage status[3].

Need for Strategic Environmental Assessment: key concerns

Although UNESCO has engaged Mexico, the United States and China extensively on the conservation crisis of the vaquita marina, including through repeated Committee decisions calling for urgent action to prevent the species' extinction[4], this focus has had the effect of narrowing the scope of analysis concerning threats to the World Heritage property. While the vaquita is geographically concentrated in the Upper Gulf, the proposed LNG export corridor bisects the Mid- and Southern regions of the property, creating a systemic threat to its functional integrity.

The impacts associated with LNG infrastructure — such as increased ship strikes, underwater noise pollution, ballast water discharge, light pollution, habitat fragmentation, and greenhouse gas emissions — have not been comprehensively evaluated in relation to the property's OUV. Yet, the World Heritage Committee has consistently affirmed that threats arising outside the boundaries of a property, including in its wider setting, must be assessed when they have the potential to affect OUV[5]. In this context, the current situation represents a "potential danger" to the OUV as per Paragraph 180 of the Operational Guidelines. Specifically, the increase in large-vessel transits introduces chronic acoustic masking and lethal strike risks across primary migratory and feeding corridors for the 34% of the world's marine mammal species that constitute a key attribute of the property.



Fig. 1: LNG terminals can extend far into the open sea and destroy large extents of natural coastline.
Photo: Gulf Development Public Company Ltd.

In this case, an SEA is indispensable to evaluate cumulative, regional, and long-term impacts that cannot be captured through individual project-level assessments. Such assess-

ments must be elevated to a Heritage Impact Assessment (HIA), in accordance with the 2022 UNESCO Guidance and Toolkit, to ensure that the integrated gas corridor is evaluated as a single functional threat rather than as a series of isolated projects.

Additionally, while concerns have been expressed by UN human rights mandates[6] and IUCN[7], LNG projects and increased shipping continue to advance without adequate consideration of World Heritage requirements. At the same time, affected coastal and Indigenous communities have not been meaningfully consulted in line with international standards, undermining participatory principles and the overall credibility of the assessment process[8].

Need for urgent World Heritage Committee attention

Given the rapid advancement of LNG projects and the scale of their potential impacts, there is an urgent need for this case to be placed on the World Heritage Committee's agenda as a matter of priority. The property's status on the List of World Heritage in Danger is predicated on the State Party's ability to implement corrective measures. The introduction of a new, large-scale industrial threat — unaccounted for in the Desired State of Conservation for the removal of the property from the List — fundamentally undermines these efforts.

Despite prior Committee decisions calling for robust, internationally consistent impact assessments[9], recent approvals and public statements suggest a weakening of environmental review processes. In this context, presidential assertions that the Saguaro LNG project presents no irregularities[10] — notwithstanding the existence of several ongoing constitutional lawsuits[11] —and that permits for the AMIGO LNG project are expected to be issued in the near term, with construction anticipated shortly thereafter[12], could be perceived as prejudging ongoing judicial processes and undermining confidence that World Heritage Committee and UN concerns will be addressed in good faith.

Update to the property's Statement of Significance and Integrity

Since its inscription in 2005, the **Islands and Protected Areas of the Gulf of California** have been celebrated as a "natural laboratory" of global importance. However, the property's OUV is no longer solely threatened by localized illegal fishing. It now faces a transformative industrial shift. The proposed emergence of an integrated LNG corridor represents a "Potential Danger" under §180 of the Operational Guidelines, as it threatens to fundamentally alter the ecological and acoustic integrity of the marine environment that supports the site's biodiversity (Criteria ix and x).

The cumulative scale of these projects — encompassing terrestrial terminals, transboundary pipelines, and an unprecedented surge in ultra-large vessel traffic — constitutes a change in the state of conservation that has not been evaluated by the World Heritage Centre. This industrialization is occurring in the absence of a SEA, leaving the Committee without the necessary data to determine if the property can still maintain its OUV under these new conditions.

World Heritage Criterion	Key Attributes of the Property	Projected Impact of LNG Corridor & Shipping
Criterion (vii): Exceptional natural beauty	Pristine "desert-meets-sea· landscapes; high water clarity; minimal light pollution.	**Visual & Light Pollution:** 24/7 industrial flare stacks and terminal lighting; presence of ultra-large carriers disrupting the wilderness character.
Criterion (ix): Ongoing ecological and biological processes	"Natural laboratory"; critical upwelling zones; primary productivity supporting massive biodiversity.	**Acoustic Masking:** Chronic underwater noise from turbines and engines interfering with the communication/navigation of 30+ marine mammal species.
Criterion (x): Conservation of biological diversity	Habitat for 34% of the world's marine mammals; migratory corridors for Blue and Fin whales.	**Lethal Strike Risk:** High-frequency vessel traffic crossing narrow migratory bottlenecks; habitat fragmentation from "industrial noise walls."
Integrity & Management	Connectivity between protected islands and marine zones; absence of heavy industrialization.	**Functional Fragmentation:** The "Integrated Gas Corridor" bisects the property, creating a permanent industrial barrier between the Northern and Southern Gulf.

Fig. 2: Key attributes of the (OUV) of the **Islands and Protected Areas of the Gulf of California** and their functional connectivity across the property and its wider setting.

Given that the property is already on the List of World Heritage in Danger, the threat posed by LNG infrastructure is not a peripheral concern but a direct obstacle to the site's recovery. ***Therefore, we formally call upon the World Heritage Centre, in consultation with IUCN, to urgently request the invitation of a Reactive Monitoring Mission to the property.*** This mission is essential to assess the compatibility of these large-scale industrial developments with the World Heritage status and to evaluate whether the current "Corrective Measures" remain sufficient considering this regional industrial transformation.

In conclusion, the **Islands and Protected Areas of the Gulf of California** World Heritage property stands at a critical juncture. It is inherently inconsistent to focus international efforts on the removal of illegal gillnets in the north while simultaneously permitting a permanent, high-impact industrial corridor to be established through the heart of the property. The absence of a SEA, combined with inadequate public and Indigenous consultation, threatens the property's OUV and warrants timely consideration by the World Heritage Committee to prevent irreversible harm.

Notes

1 LNG ALLIANCE (2026). Amigo LNG. https://www.lngalliance.com/projects-7; MEXICO PACIFIC (2026). Saguaro Energy https://mexicopacific.com/saguaro-energia/ and Sierra Madre pipeline. https://mexicopacific.com/es/gasoducto-sierra-madre/; Sempra Infrastructure (2026) https://semprainfrastructure.com/es/que-hacemos/gnl/

2 UNESCO World Heritage Committee. (2017). Decision 41 COM 7B.19. Paris; UNESCO World Heritage Committee. (2019). Decision 43 COM 7B.21. Paris.

3 UNESCO. (2023). Operational guidelines for the implementation of the World Heritage Convention. Paris: UNESCO World Heritage Centre, para. 118 Bis.

4 UNESCO World Heritage Committee. (2017). Decision 41 COM 7B.19. Paris; UNESCO World Heritage Committee. (2021). Decision 44 COM 7B.24. Paris.

5 UNESCO World Heritage Committee. (2015). Decision 39 COM 7. Paris; UNESCO World Heritage Committee. (2025). Decision 47 COM 7A.5. Paris.

6 UN Special Procedures mandates, including the Special Rapporteurs on climate change, cultural rights, the right to development, the human right to a clean, healthy and sustainable environment, health, the rights of Indigenous Peoples, and water and sanitation, as well as the Working Groups on business and human rights and on the rights of peasants and rural workers. See AL MEX 4/2025 (2 September 2025) available at: https://spcommreports.ohchr.org/TMResultsBase/DownLoadPublicCommunicationFile?gId=29862 (Spanish only). Additional information was requested from the Governments of the United States and Singapore and from the companies proposing the projects. See USA 12/2025, available at: https://spcommreports.ohchr.org/TmSearch/RelCom?code=USA%2012/2025 (Spanish only).

7 IUCN, Motion 031, Protecting the Gulf of California World Heritage Sites of Mexico from industrialisation for liquefied natural gas development (24 Sept. 2025), https://iucncongress2025.org/assembly/motions/motion/031

8 For example, local communities formally requested the opening of public participation proceedings on 10 October 2024 for the Vista Pacífico LNG project. To date, more than one year later, no such proceedings have been initiated, effectively preventing affected communities from exercising their right to participate in environmental decision-making. See UNESCO. (2023). Operational guidelines for the implementation of the World Heritage Convention. Paris: UNESCO World Heritage Centre, paras. 12 & 40.

9 UNESCO World Heritage Committee. (2025). Decision 47 COM 7A.5. Paris.

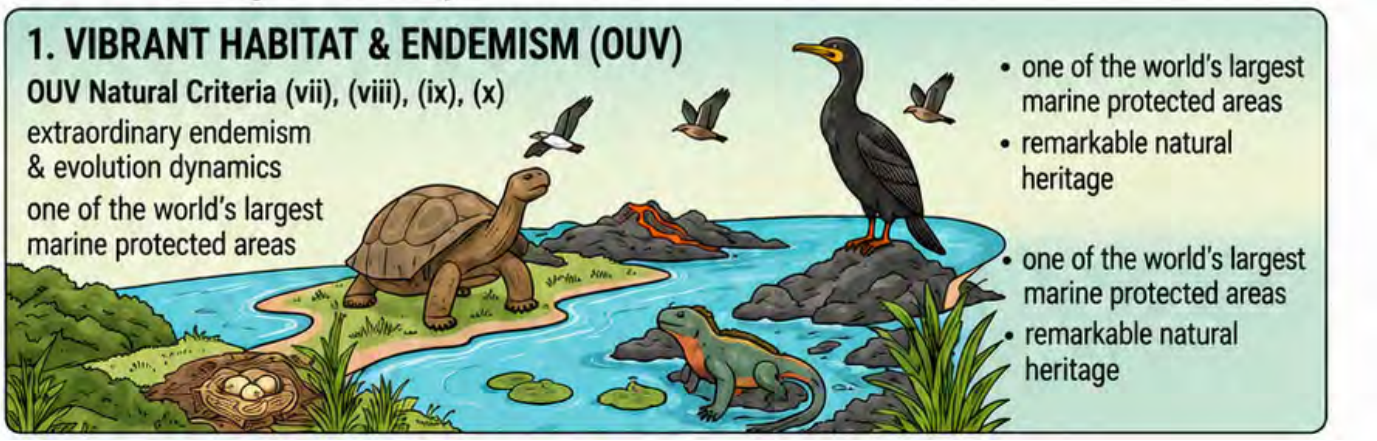
10 Sheinbaum, Claudia (2025, December 1). Statement during the morning press conference ("mañanera") [Video]. YouTube. https://www.youtube.com/watch?v=85Aen_Uun0s (2:14:10–2:33:35). (Author's own translation from Spanish): Referring to the Saguaro Project, the President stated that it is "an interesting project," that "there are no irregularities," and that "an environmental impact assessment has already been approved by SEMARNAT, but authorities are reviewing the number of vessels that would enter in order to avoid impacts on the Gulf of California. The Ministry of Energy (SENER) is assessing whether an additional gas pipeline would be required."

11 To date, **eleven** constitutional lawsuits (amparos) remain pending in relation to the Saguaro LNG project and the associated STGN Sierra Madre Gas Pipeline.

12 Sheinbaum, Claudia (2026, February 2). Statement during the morning press conference ("mañanera") [Video]. YouTube. https://www.youtube.com/live/xDJqrsX88pk?t=6391s (1:46:35–1:48:17). (Author's own translation from Spanish):"(…) in Guaymas there is a very significant investment announced by President López Obrador: a natural gas liquefaction plant. It had not been possible to move forward because a segment of the gas pipeline from Hermosillo to Sonora was missing. SENAGAS will now build it; all permits are already in place, and construction will begin in one month." Sheinbaum, Claudia (2026, April 8). Statement during the morning press conference ("mañanera") [Video]. YouTube. https://www.youtube.com/watch?v=EnLBv_Azlzg (1:17:38–1:17:41). (Author's own translation from Spanish): "(…) and the [LNG liquefaction terminal] project in Guaymas is expected to be approved soon."

Galápagos Islands Meet Criteria for World Heritage In Danger Status

Alejandro Olivera, Center for Biological Diversity



The Galápagos Islands are globally irreplaceable as a living laboratory of evolution and a cornerstone of modern conservation science, closely associated with Charles Darwin and *On the Origin of Species*. The property's Outstanding Universal Value (OUV) is expressed through: (i) exceptional natural beauty and iconic seascapes and wildlife viewing (criterion vii); (ii) outstanding volcanic and geological processes and landforms (criterion viii); (iii) globally significant ecological and evolutionary processes across oceanic island and marine ecosystems (criterion ix); and (iv) extraordinary biodiversity, high endemism, and threatened species assemblages on land and at sea (criterion x). These OUV attributes depend on maintaining ecological integrity, minimizing human-mediated introductions, and sustaining effective protection across both terrestrial and marine components.[1]

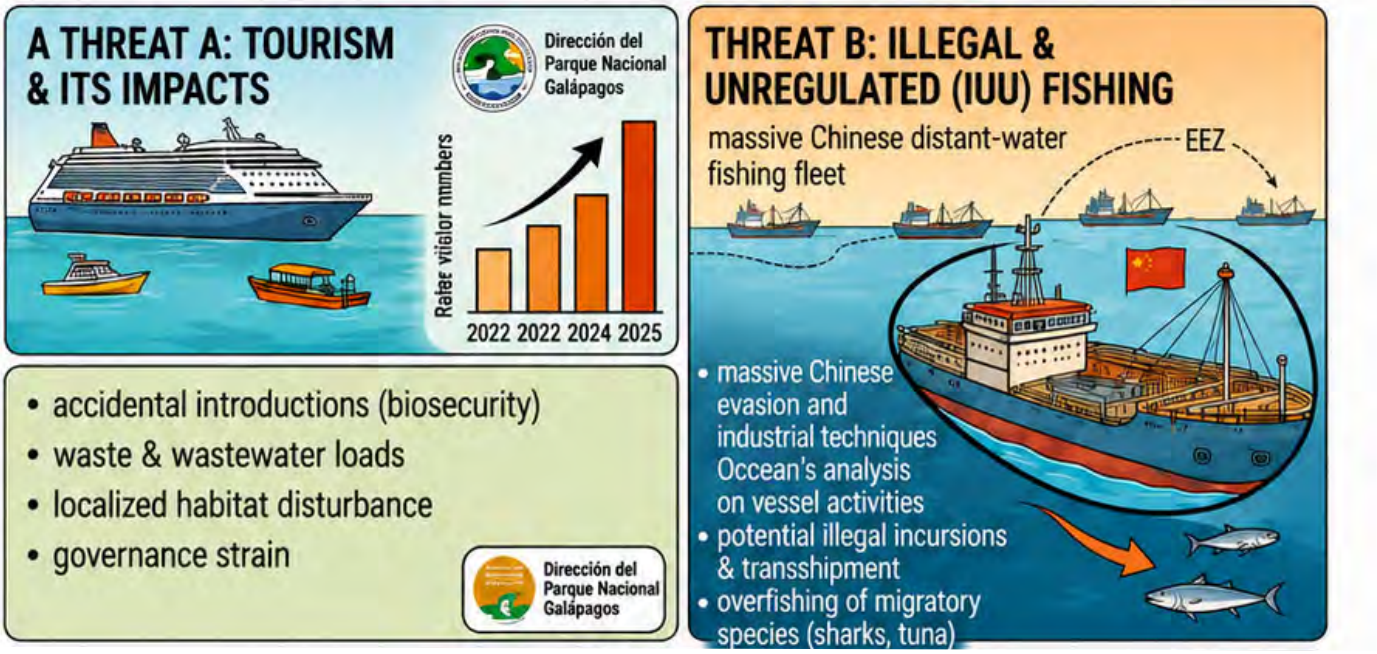
But the property's integrity as a functioning evolutionary system is threatened, as its OUVs are deteriorating from: (1) population expansion disrupting ecological and evolutionary processes; (2) loss or decline in endemic and threatened species; (3) degradation of coastal and marine ecosystems from pollution and illegal and unregulated fishing; and (4) a persistent "implementation gap" in which plans exist but are not enforced at a necessary scale. The World Heritage Committee has underscored that protecting its OUV may require limits on visitor numbers and flight frequencies, while demanding that the updated 2025 Management Plan move beyond vague goals to include concrete OUV health indicators and threat assessments, and it reiterates the need to integrate OUV indicators and threats into an updated Management Plan expected in 2025.[2]

A) Tourism pressure remains high with no demonstrated hard cap

The 47th Session of the World Heritage Committee (2025) maintains "zero growth" as the optimal scenario for long-term OUV protection and states that safeguarding OUV may require limits on visitor numbers and flight frequencies.[3] Yet, since 2025, there has been no implementation of an enforceable, multi-sector regime to cap tourism. Without specific limits on arrivals and hotel capacity, the site continues to face an unmanaged expansion of both tourism and its associated urban service requirements.

Moreover, tourism pressure remains high, contradicting the 'zero growth' model. While 2024 saw 281,421 visitors[4] — a 15% drop from 2023's record — the first half of 2025 shows a rebound. With 145,655 visitors (Jan–June),[5] 2025 is trending 2% higher than the same period last year, suggesting that 2024's decline was a temporary fluctuation and that annual totals are likely to rise again.[6,7]

Why it matters for the OUV: sustained high visitor volumes (i) expand cargo and inter-island transport, (ii) create higher waste streams and pollution risk, and (iii) increase likelihood of introduction and spread of invasive species — directly undermin-



ing criteria (ix) and (x) and affecting criterion (vii) through landscape/seascape impacts.[8]

B) IUU fishing and marine integrity: constraints persist; recent science indicates ongoing illegal activity

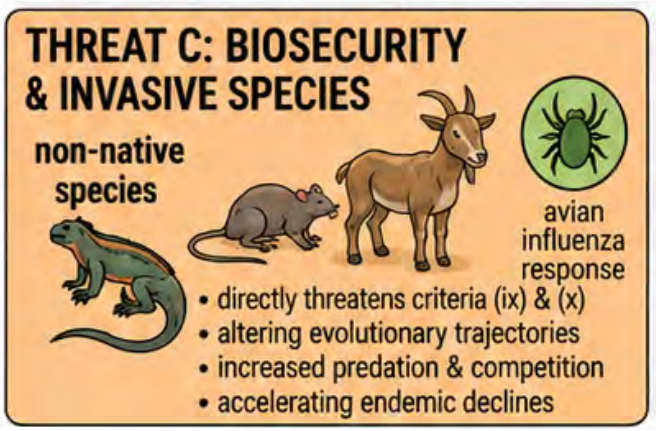
The Committee has encouraged strengthened surveillance and resourcing, recognizing that monitoring/control capacity is central to safeguarding the marine component of the OUV.[9] However, recent peer-reviewed research analyzing enforcement/monitoring datasets generated by the Park authority, documents persistent illegal artisanal longline activity within the reserve system causing bycatch of threatened/protected species (i.e. critically endangered scalloped hammerheads (*Sphyrna lewini*) and endangered giant manta rays (*Mobula birostris*)). The analysis also documented frequent (69% of the fishing trips) AIS deactivation, a non-compliance behavior used to avoid detection of illegal fishing activity. The study further documents an upward trend in standardized detection in 2021–2024, indicating that illegal artisanal longlining persisted during this period despite ongoing monitoring and enforcement efforts.[10]

Why it matters for OUV: illegal fishing threatens marine trophic structure and threatened species (criterion x) and disrupts ecological processes (criterion ix), undermining the property's marine OUV integrity.[11]

C) Introduced flora and fauna: introduction and spread remain active and growth-linked

The Committee notes progress in implementing invasive species and biosecurity measures and requests adequate resources to consolidate these gains and further strengthen infrastructure and capacity.[12] Yet the archipelago continues to experience new establishment and spread of non-native species consistent with high movement and cargo connectivity. The Charles Darwin Foundation documents expanding populations of an invasive treefrog and stresses that previous control efforts have not been successful, underscoring ongoing vulnerability and the need for stronger control strategies.[13] Major international reporting likewise highlights the scale of this invasion and the difficulty of management once establishment is widespread.[14]

In addition to recent amphibian introductions, a continuing exotic-species threat is the invasive avian vampire fly (*Philornis downsi*), a nest parasite linked to high mortality in endemic landbirds. Peer-reviewed studies from 2025 confirm both the ongoing severity of this threat and biological features that may facilitate its persistence and spread across islands, reinforcing the need for sustained biosecurity and invasive-species capacity commensurate with OUV protection (criteria ix and x).[15]



Why this threatens the OUV: introduced species, including pathogens/parasites as well as classic invasive taxa, can rapidly disrupt food webs and ecological interactions, directly undermining criteria (ix) and (x). Without enforceable limits on growth-linked pathways (air/sea logistics, inter-island transport, construction/services expansion), biosecurity is forced into a structurally losing posture—mitigating an input stream that governance continues to amplify.[16]

D) Plastic pollution remains a chronic marine integrity stressor, with limited evidence of property-scale reduction

The Committee recognizes plastic pollution as a persistent threat and notes the launch of a Coastal and Marine Plastic Pollution Management Plan and local ordinance, while requesting adequate resources for implementation.[17] It is now clear that plastic pollution is a demonstrated problem, yet there is no evidence that plastic pollution has been measurably reduced at a property-wide scale.

Since 2025, monitoring has increased: the International Atomic Energy Agency opened an IAEA-supported microplastics laboratory in Galápagos to improve monitoring and analysis capacity.[18] New peer-reviewed evidence likewise confirms persistent microplastic exposure dynamics: a 2026 study (data spanning 2020–2025) reports large-scale beach microplastic monitoring in Galápagos and identifies spatiotemporal accumulation patterns, including peaks associated with oceanographic variability. The mean microplastic concentration on a bay was 145.29 ± 23.57 particles m^{-2}, which increased significantly in 2024.[19]

Why this threatens the OUV: chronic debris and microplastics degrade marine ecosystem integrity, harm biota through ingestion and entanglement pathways and associated ecological effects, and add cumulative stress to OUV attributes under (ix) and (x) — especially when combined with high traffic, waste generation, and enforcement constraints.[20]

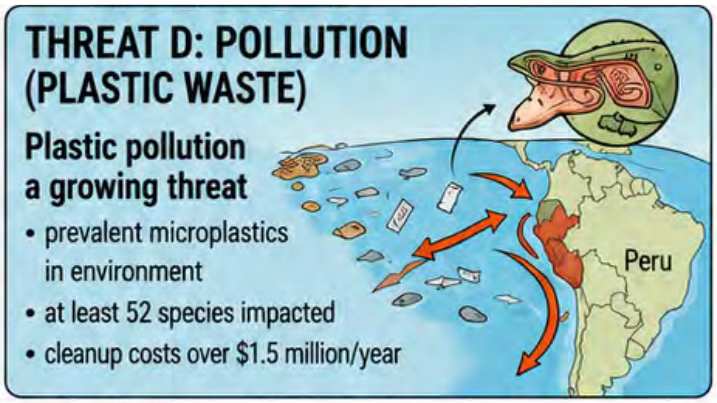
E) The 2025 Management Plan update remains critical but not yet completed

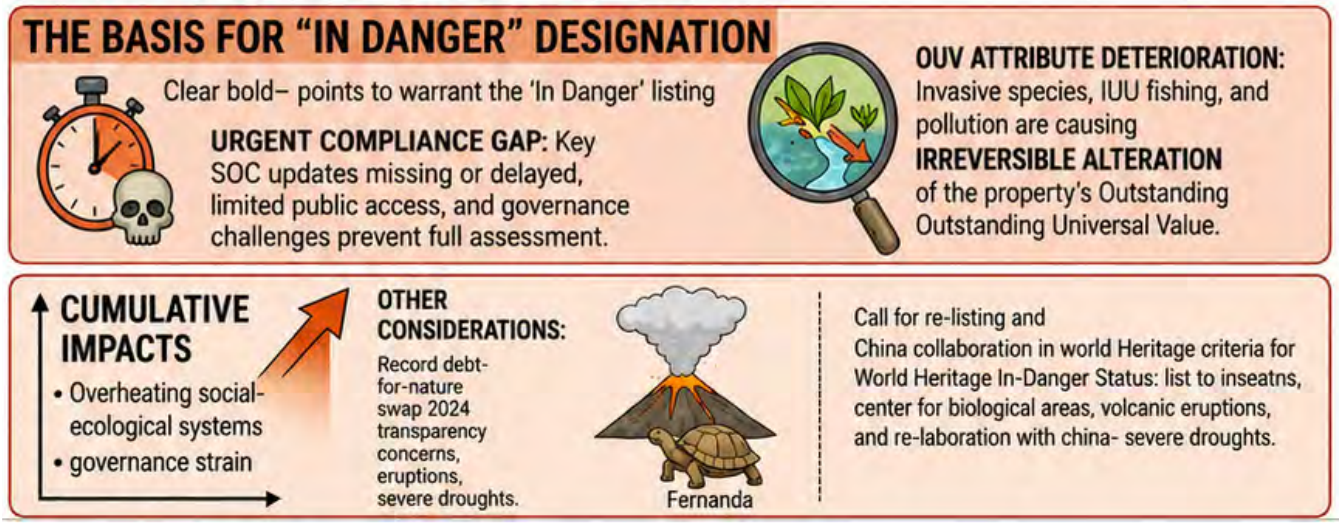
The Committee reiterates that OUV indicators and threats must be integrated into an updated Management Plan expected in 2025.[21] As of February 2026, the publicly available record on the World Heritage website and the State Party's SOC (State of Conservation) report still frames the update as an expected deliverable, and a finalized adopted plan text and implementing instruments are not clearly evidenced through the Committee's 2025 decision record itself.[22]

WHC action implication: the State Party should be requested to submit (i) the final adopted Management Plan text, (ii) the binding implementing measures that operationalize "zero growth" across sectors, and (iii) a compliance mechanism demonstrating continuity across administrations (i.e., audit/verification and consequences for non-compliance).

The conditions for in-danger inscription are met, and corrective measures are feasible

Under the UNESCO World Heritage Centre Operational Guidelines, Reactive Monitoring applies to properties "under threat"





and is explicitly linked to the procedures for inscription on the List of World Heritage in Danger (paras. 177–191).[23] The Guidelines' framework supports in-danger inscription where ascertained or potential danger to OUV and integrity exists and where corrective action — defined, time-bound, and verifiable — is feasible.

On the 2025–present record, the Galápagos meet this threshold because:

1. The Committee states that OUV protection may require binding limits on visitor numbers and flight frequencies, yet enforceable caps remain unproven while visitation pressure remains high;[24]
2. Illegal fishing continues, with peer-reviewed evidence documenting persistent illegal longlining, AIS deactivation, and bycatch of threatened/protected species;[25]
3. Plastic pollution remains persistent, and while planning instruments exist, reductions at the property scale are not clearly demonstrated;[26]
4. Introduced species risk continues, with credible scientific and media reporting describing expanding invasion dynamics and unsuccessful control attempts.[27]

Requested WHC / Committee action:

- Inscribe the property on the List of World Heritage in Danger and develop a short set of Corrective Measures and a DSOCR anchored in enforceable zero-growth controls and measurable OUV outcomes; and
- Request an invitation to dispatch a Reactive Monitoring Mission to verify enforceability, operational capacity, and on-the-ground compliance (including tourism throughput controls, biosecurity inspection capacity, and marine surveillance effectiveness).

Notes

1 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

2 Id.

3 Id.

4 Gobierno del Ecuador. (2025, February 11). 279.277 visitantes llegaron a las Islas Galápagos durante 2024 (Boletín de Prensa N° 005). Dirección del Parque Nacional Galápagos. https://galapagos.gob.ec/279-277-visitantes-llegaron-a-las-islas-galapagos-durante-2024/

5 Agencia EFE. (2025, July 11). Las Galápagos registraron 145.000 turistas en primer semestre de 2025, un 2% más que 2024. Swissinfo. https://www.swissinfo.ch/spa/las-gal%C3%A1pagos-registraron-145.000-turistas-en-primer-semestre-de-2025%2C-un-2-%25-m%C3%A1s-que-2024/89726395

6 279.277 visitantes llegaron a las Islas Galápagos durante 2024. Boletín de Prensa N° 005. Galápagos, 11 de febrero de 2025. Gobierno de Ecuador. Available at: https://galapagos.gob.ec/279-277-visitantes-llegaron-a-las-islas-galapagos-durante-2024/ ;Dirección del Parque Nacional Galápagos. (n.d.). Galápagos recibió en 2024 un total de 329.475 visitantes, cifra récord desde 1978. Available at : https://www.galapagos.gob.ec/gobierno/galapagos-recibio-en-2024-un-total-de-329-475-visitantes-cifra-record-desde-1978/

7 Las Galápagos recibieron a 145.000 turistas en primer semestre de 2025, 2 % más que 2024. https://es.investing.com/news/stock-market-news/las-galapagos-recibieron-a-145000-turistas-en-primer-semestre-de-2025-2--mas-que-2024-3229382

8 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

9 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

10 Buitrón-López, P., Romero-Caicedo, A., Tapia-Jaramillo, A., et al. (2025). Illegal artisanal longline use in the Galápagos Marine Reserve characterized through monitoring and control data. Frontiers in Marine Science, 12, 1636476. https://www.frontiersin.org/articles/10.3389/fmars.2025.1636476/full

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12 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

13 Charles Darwin Foundation. (2025, March 20). A noisy invader: The invasive tree frog in Galápagos. https://www.darwinfoundation.org/en/news/all-news-stories/a-noisy-invader/

14 The Guardian. (2025, November 4). Invasion of the body snatchers: frogs on Galápagos grow to huge numbers and begin attack on wildlife. https://www.theguardian.com/environment/2025/nov/04/invasion-of-the-body-snatchers-frogs-on-galapagos-grow-to-huge-numbers-and-begin-attack-on-wildlife

15 Basnet, A., Palacios, C., Meng, H., Nakhwa, D. R., Farmer, T., Dahal, N., Anchundia, D., Heimpel, G. E., Causton, C. E., Koop, J. A. H., & Lamichhaney, S. (2025). Genomic insights into the successful invasion of the avian vampire fly (Philornis downsi) in the Galápagos Islands. Molecular Biology and Evolution, 42(3), msaf052. https://doi.org/10.1093/molbev/msaf052 ; Kofler, B., Mauchamp-Fessl, M., Poveda-Pazmiño, C., Causton, C. E., Tebbich, S., & Fessl, B. (2025). Innovations in invasive parasite control: Enhancing nest treatment techniques to combat the threat of the avian vampire fly Philornis downsi in Galápagos. Frontiers in Conservation Science, 6, 1591266.

16 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

17 Id.

18 International Atomic Energy Agency. (2025, July 28). Ecuador gets support to improve detection of microplastics in its waters. (Press Release 75/2025) https://www.iaea.org/newscenter/pressreleases/ecuador-gets-support-to-improve-detection-of-microplastics-in-its-waters

19 Savage, G., Guézou, A., Jones, J. S., Márquez Rea, L., Buitron López, M. L., Pilla Quinchiguango, S. H., Lewis, C., & Galloway, T. S. (2026). Rapid spatiotemporal monitoring of beach microplastics in the Galápagos Islands. Marine Pollution Bulletin, 226, 119344. https://doi.org/10.1016/j.marpolbul.2026.119344 https://pubmed.ncbi.nlm.nih.gov/41650716

20 UNESCO World Heritage Committee. (2025). Decision 47 COM 7B.36: Galápagos Islands (Ecuador). https://whc.unesco.org/en/decisions/8760/

21 Id.

22 Id.

23 UNESCO World Heritage Centre. (2025). Operational Guidelines for the Implementation of the World Heritage Convention. https://whc.unesco.org/en/guidelines/

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The Pantanal: Update on Conditions Relevant to In Danger Consideration and Brazil's Compliance

Alejandro Olivera, Center for Biological Diversity

The Pantanal Conservation Area is one of the world's most important tropical wetland systems — an immense flood-pulse landscape in which seasonal inundation governs habitat mosaics, productivity, and wildlife movements. Its Outstanding Universal Value (OUV) is recognized under criteria (vii), (ix), and (x), reflecting exceptional wetland scenery, globally significant flood-driven ecological processes, and high biodiversity values, including habitat for threatened species.[1]

What is at stake is the integrity of the flood-pulse system as the biophysical foundation of the OUV. This OUV deterioration can occur through (1) disruption of flood timing, magnitude, and connectivity; (2) habitat degradation and faunal losses associated with extreme drought–fire episodes; and (3) cumulative basin-scale pressures — upstream land-use change, contaminants, biological invasions, and navigation/infrastructure interventionsv—vthat alter hydrology, sediment dynamics, and disturbance regimes, consistent with the pressure pathways emphasized in the 2025 World Heritage review cycle.[2]

A) Fire and drought remain the dominant integrity risk — and a key 2025 compliance deliverable is still central

Decision 47 COM 7B.33 (2025) treats the drought–fire crisis as an integrity-level threat and explicitly requests an assessment of wildfire impacts on OUV and integrity. Brazil has reported major declines in hotspots and burned area in 2025 compared with 2024, including strong reductions in the Pantanal reported by federal authorities. This is a meaningful positive development. However, Brazil has still not delivered the Committee-requested, OUV- and integrity-focused wildfire impact assessment, and improved annual fire metrics do not substitute for that assessment. The compliance question is not limited to annual burned-area totals; it is whether OUV attributes have been decreased, what recovery route is realistic, and what risk-reduction actions are required to prevent recurrence under intensifying drought conditions.[3,4]

Peer-reviewed research shows why an OUV- and integrity-focused assessment is necessary. A 2025 study on vertebrate impacts from fires in Brazil reports significant mortality and displacement, with reptiles making up the largest share of recorded deaths—evidence of serious biodiversity impacts in extreme fire years.[5] The WHC Advisory Bodies' 2025 analysis likewise treats drought-fire as an integrity-scale concern and notes that impacts on OUV are still not well characterized, making the requested assessment a key compliance requirement and a necessary basis for any corrective measures.[6] Brazil's ongoing failure to submit this assessment keeps the Committee without the minimum evidence base needed to judge OUV condition, define corrective measures, or verify recovery.

B) Basin hydrology and upstream pressures are undermining the flood-pulse foundation of the OUV

The 2025 WHC Advisory Bodies analysis identifies severe hydrological anomalies, including exceptionally low flooding conditions, and emphasizes that basin-scale drivers, including processes operating beyond the property boundary, are decisive for the Pantanal's functioning. A 2025 hydrology study in the Upper Paraguay River Basin reports patterns in rainfall, streamflow, and flooded-area dynamics that are directly relevant to interpreting recent drought conditions and understanding how upstream hydrological behavior propagates into the Pantanal system.[7,8]

They also noted that the headwater highlands have lost 41% of their natural cover (1985–2023) due to deforestation/land-use change and infrastructure development, and that cumulative impacts on OUV since 2020 remain unclear because key assessments were postponed due to budget constraints—showing that basin-scale drivers and their OUV implications are not yet being adequately controlled or fully assessed.[9] This is not a neutral information gap: it reflects inadequate resourcing and follow-through by Brazil to implement basin-scale management commensurate with the property's OUV.

This threatens OUV because criteria (ix) and (x) depend on hydrological connectivity and floodplain productivity. If low-water conditions become more frequent or prolonged, or if sedimentation channel dynamics shift inundation patterns, core ecological processes weaken and habitat availability declines — often interacting with fire risk by drying fuels and reducing natural water buffers.[10] Brazil has not yet demonstrated that it is re-

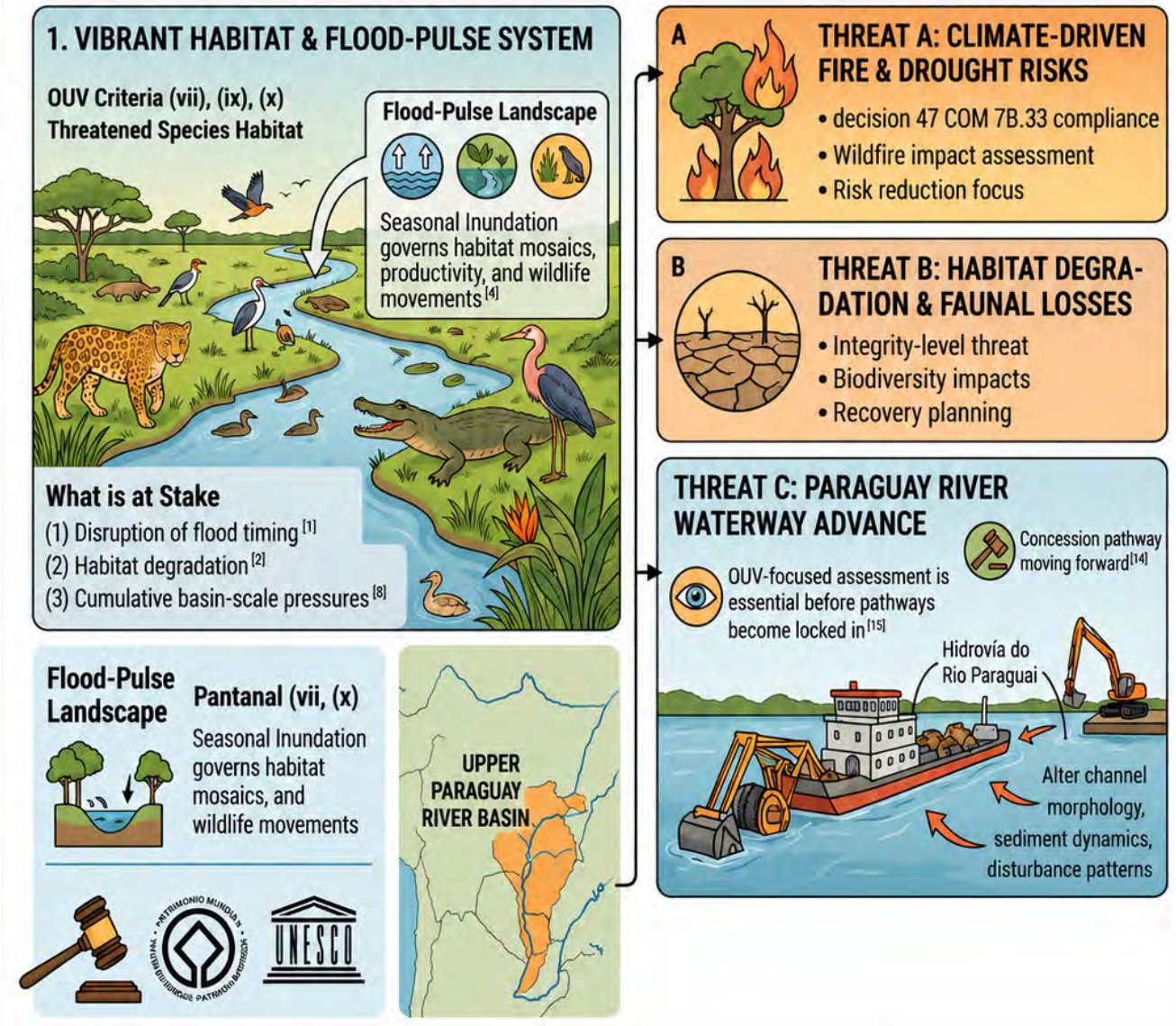
ducing these upstream pressures at the scale necessary to safeguard the flood-pulse processes that underpin OUV.

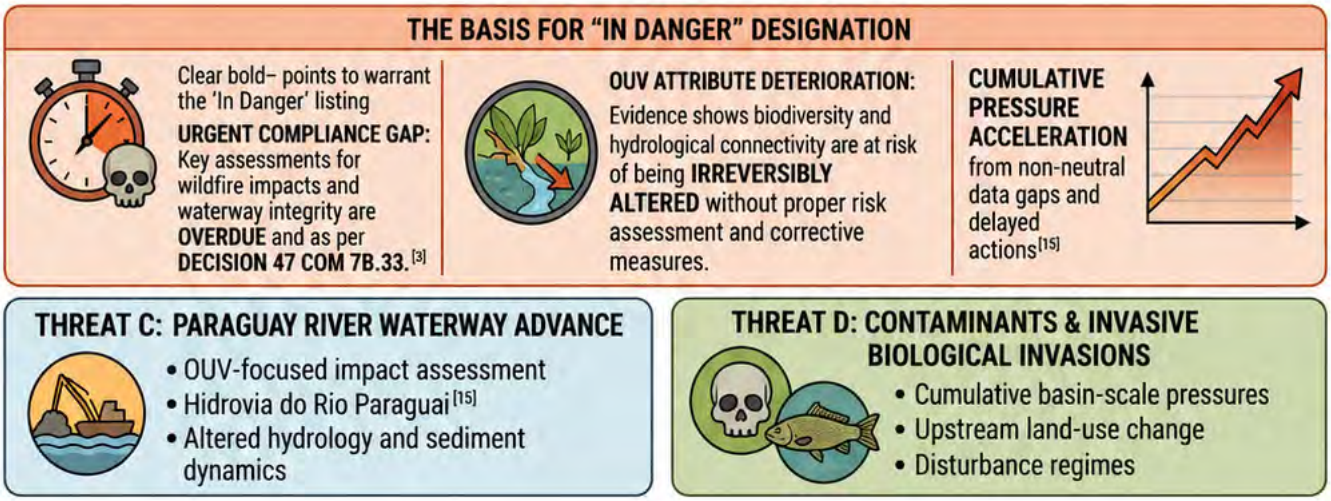
C) The Paraguay River waterway pathway is advancing without proper assessment

Decision 47 COM 7B.33 requests that Brazil address the proposed commercial waterway by ensuring an OUV-focused environmental assessment capable of evaluating potential impacts on the property's OUV and integrity (including, where appropriate, Heritage Impact Assessment elements consistent with Advisory Bodies guidance).[11]

At the same time, official steps around the Hidrovia do Rio Paraguai concession continued moving forward through 2025 via ANTAQ consultation and hearing processes that describe scope, concession structure, and planned operational elements. This matters because once procurement and implementation pathways advance, the practical ability to adjust sequencing and design to avoid OUV harm can narrow — making timely, fit-for-purpose, OUV-focused assessment essential.[12] Brazil has not shown that this decision-critical assessment framework is in place before the concession pathway becomes effectively locked in.

This threatens OUV because navigation infrastructure and operating regimes can alter channel morphology, sediment dynamics, and disturbance patterns. In a flood-pulse wetland, these changes can propagate into floodplain inundation timing, extent, and connectivity — core determinants of criteria (ix) and (x). Compliance therefore hinges on demonstrating, through a basin- and OUV-appropriate assessment, that OUV and integrity will not be adversely affected.[13] . To date, Brazil has not provided the Committee with evidence that the waterway is being assessed and governed at the OUV/integrity scale required by the Decision.





D) Contaminants and biological invasions are compounding integrity risks

Pressures on the Pantanal are cumulative, and recent peer-reviewed evidence highlights two compounding pathways that are directly relevant to OUV and integrity. First, contaminants remain an active concern: a 2025 study reports pervasive mercury contamination in a semi-aquatic apex predator in the Pantanal, illustrating pollutant exposure pathways that can degrade trophic integrity and threaten species conservation—risks that may be amplified under altered hydrology and where sediments are mobilized during extreme events, including fire.[14] Brazil has not demonstrated that monitoring and response measures are adequate to manage these contamination pathways at the scale of the property and basin.

Second, biological invasions are emerging as a growing integrity issue at the basin scale. A 2025 *Scientific Reports* article models habitat suitability for invasive freshwater cichlids introduced in the Brazilian Upper Paraguay River Basin and concludes that large portions of the Pantanal floodplain are already suitable, with suitability projected to expand substantially under future climate scenarios. This matters for criteria (ix) and (x) because invasive predatory fishes can restructure food webs, alter ecological interactions, and increase pressure on native aquatic assemblages that underpin the property's biodiversity values.[15] Brazil has not provided a clear basin-scale prevention/containment strategy aligned to OUV protection and the escalating climate-driven suitability risk.

Conclusion and implications under the Operational Guidelines

The 2025 World Heritage decision record establishes that the property is facing integrity-relevant stressors — severe drought, reduced flooding, and significant wildfire damage — and it identifies concrete compliance deliverables that remain decisive for evaluating the property's condition and trajectory, including (i) a submitted assessment of wildfire impacts on OUV and integrity, and (ii) an Integrated Environmental Assessment for the proposed Paraguay River commercial waterway, explicitly designed to avoid negative impacts on OUV. Brazil has not yet demonstrated full, timely delivery of these core decision requirements, and the ongoing gaps materially limit the Committee's ability to verify whether OUV is being maintained.

Under the UNESCO Operational Guidelines for the Implementation of the World Heritage Convention (including the provisions on reactive monitoring and the List of World Heritage in Danger), inscription is intended for properties facing ascertained or potential danger to OUV where corrective action is feasible and can be defined in measurable terms.

On the 2025–present record — considering the WHC's own findings and requirements, plus recent peer-reviewed evidence on fire impacts, contamination pathways, and invasion risks — the Center for Biological Diversity respectfully requests that the World Heritage Centre and Committee to consider inscription of the Pantanal Conservation Area on the List of World Heritage in Danger at the next examination, paired with (1) a short set of time-bound Corrective Measures and a Desired State of Conservation for removal (DSOCR), and (2) a Reactive Monitoring Mission to verify (a) the wildfire OUV/integrity assessment and resulting restoration/risk-reduction measures, and (b) the waterway's Integrated Environmental Assessment and avoidance of OUV impacts before project decisions become difficult to reverse.

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Why is None of the Amazon's UNESCO Sites Recognized as World Heritage in Danger?

Anonymous authors

Bolivia's protected areas play a crucial role in conservation, hosting highly valuable ecosystems.[1] Yet they have come under increasing threat from forest fires. To date, the full extent of these fires has neither received sufficient international attention nor triggered adequately effective management responses. In 2024, Bolivia recorded the world's secondhighest level of forest loss after Brazil, with over 15 million hectares, the size of Greece burned.[2] Despite these unprecedented losses, no World Heritage sites in Brazil or Bolivia are currently listed as endangered. This fails to reflect the severity of the threats facing these sites or their global significance.



Fig. 1: Extent and location of the Noel Kempff National Park. *Source: The authors, based on google maps data*

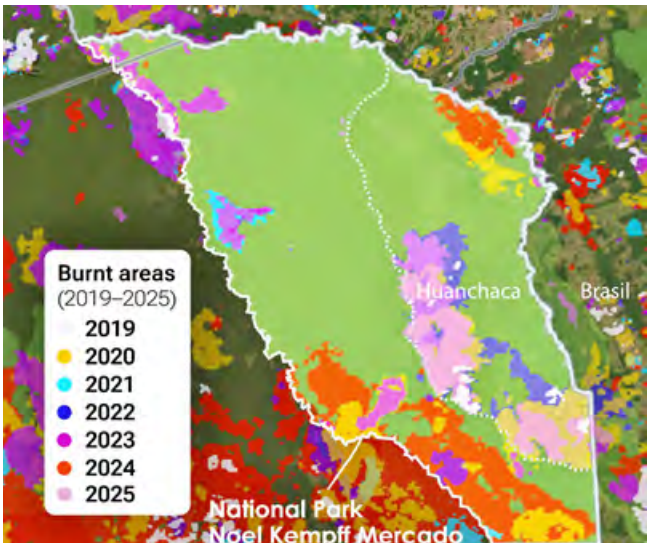


Fig. 2: Burnt Areas 2019 to 2025. *Source: The authors, based on NASA Firms Data[8]*

The Noel Kempff Mercado National Park (NKMNP) is a national park in northeastern Bolivia, bordering Brazil. It is recognized as one of Bolivia's most valuable ecosystems[3], covering an area of 1,523,446 ha, bigger than the country of Northern Ireland. Its ecosystems range from savannas, forests, and swamps to Amazonian rainforests.[4] The Park was designated according to criteria (xi) "outstanding examples representing significant ongoing ecological and biological processes"[5] and (x) "contain the most important and significant natural habitats for in-situ conservation of biological diversity" (ibid.). The Park is managed by the National Service of Protected Areas (Servicio Nacional de Áreas Protegidas, SERNAP), a governmental institution acting on behalf of the Ministry of the Environment. The following article is structured according to the criteria of *ascertained* and *potential danger* as a prerequisite for the classification of heritage in danger.[6]

Severe deterioration of the scientific value

Serious fires constitute a recurring threat to the Park. Over the past 20 years, 21% of its area has burned, with half of that area affected repeatedly between three and 14 times, resulting in substantial ecological degradation.[7] From 2019 to 2025, the Park has been affected by fires each year (Fig. 2[8]). In 2025, forest fires destroyed approximately 80,000 hectares.[9]

Figure 3[10] illustrates the cumulative treecover loss from 2001 to 2024, with its majority caused by fires, particularly those occurring in 2024. In 2022, up to 42,320 hectares[11] of the national park have burned. However, to date there is no consistent data from official sources on the extent of the area affected each year.

General drought conditions favor the spread of fires. In November 2022, the department of Santa Cruz recorded its lowest rainfall levels since 2011[32], resulting in prolonged dry periods which in turn can exacerbate the severity and extent of fires. At this point, however, it must be emphasized that although climatic conditions increase the extent of fires, the main cause of the fires is not climate change but man-made triggers.

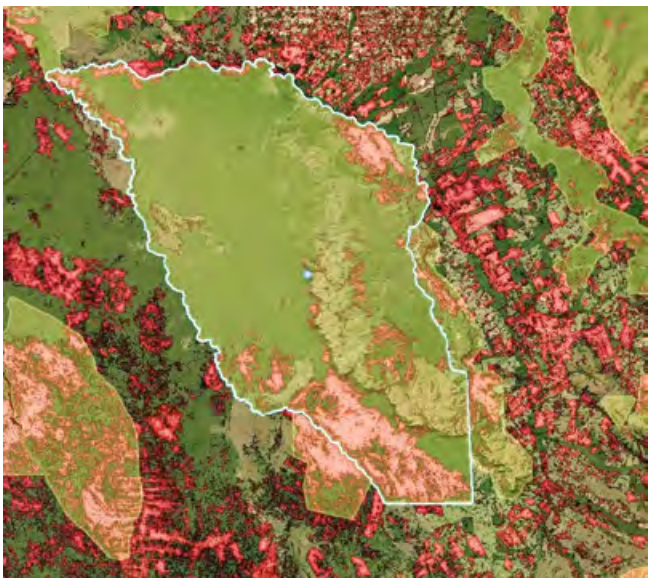


Fig. 3: Cumulative tree cover loss. *Source: UNESCO Sites Navigator*[10]

Fires in ecologically relevant areas: Satellite images show that fires affected major parts of the Huanchaca Plateau in the years 2020, 2022 and 2025 (Fig. 2). This area constitutes a particularly valuable habitat, forming part of the nomination criteria for UNESCO status.[12] Its endangerment must be reported in accordance with UNESCO regulations.[13]

Researchers report that they can no longer go to their field stations in the park because drug traffickers are active in the area. Some have been unable to continue their research since 2018.[14] This directly affects the park's UNESCO nomination criteria (ix) and (x): "The cerrado habitats found on the Huanchaca Meseta have been isolated for millions of years, providing an ideal living laboratory for the study of the evolution of these ecosystems."[15]

Illegal drug laboratories and agriculture as driving factors

Over the years, several drug laboratories, including two 'megalaboratories' identified in 2025 for processing cocaine, have been discovered within the boundaries of the National Park.[16] As a consequence of this serious situation, a mobile police base was established in the park in September 2025 to combat trafficking.[17] Bolivian Minister of Environment and Water Álvaro Ruiz stated that illegal mining and drug trafficking are linked to the fires in Noel Kempff Mercado National Park.[18] According to experts, drug traffickers set fires in the protected area to clear pathways or plant coca leaf crops. Fig. 5[19] provides evidence of one of several illegal aircraft landing strips within the park used for the transport of cocaine.[20] Additional sources report that illegal mining activities occur along the Paucerna River.[21]

Figure 6[22] illustrates that adjacent to the livestock-farming areas in Brazil, the protected area of the NKMNP represents one of the last remaining zones of intact ecosystems, as large portions



Fig. 4: Cocaine laboratory in the Park. *Source: El Deber*[33]



Fig. 5: Illegal Airstrip in the Park -14.071072, -60.506647. *Source: google maps*[19]

of the surrounding landscape have already been converted to agricultural use.

Agriculture-related pressure (Fig. 7[23]) poses both direct and indirect threats, as fires used to clear land for cultivation frequently get out of control[24] and spread into the interior of the Protected Area. Agriculture is considered the primary cause of fires in San Matías, Bajo Paraguá, and Noel Kempff.[25] Due to the dry conditions and the limited accessibility of these areas for emergency services, fires in NKMNP spread particularly rapidly, and even minor ignition events can have severe consequences.

Inadequate management

The national body responsible for protected areas, SERNAP, has been associated with a series of contradictory actions, raising questions about whether the organisation's primary commitment remains the protection of nature. Examples include the dismissal of park directors after they reported illegal mining activities and criticized the handling of forest fires.[26] In 2024, a year marked by severe forest fires, the Director of Planning at SERNAP publicly denied the existence of forest fires in Bolivia during COP16 of the Biodiversity Convention in Cali, Colombia.[27] The same official in November 2023 prohibited the directors of protected areas from making any statements to



Fig. 6: Agriculture in Brazil in areas bordering the NKMNP, 2025. *Source: NASA Firms*[22]

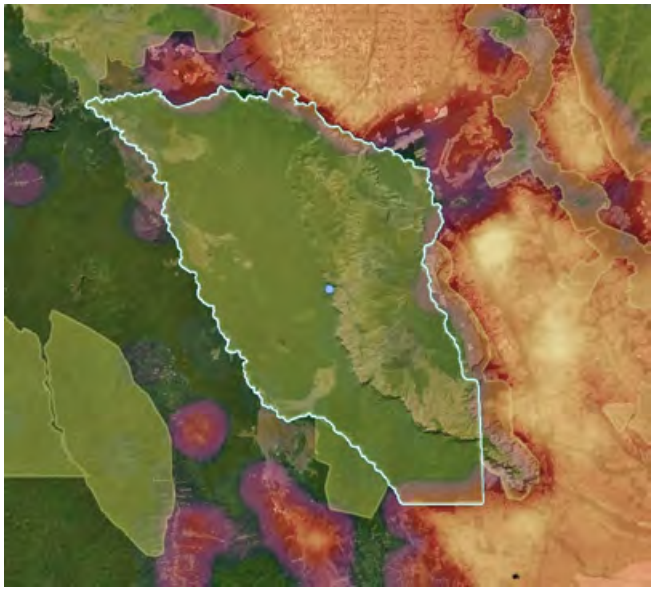


Fig. 7: Agriculture-related Pressure 2017. *Source: UNESCO Sites Navigator*[23]



Fig. 8: Some fires were visible from space. *Source: Amazonas Conservation*[35]

the media without prior approval. This directive was widely regarded as a threat to freedom of speech and to the Escazú Agreement.[28]

Non-compliance with reporting requirements: The parks administration has failed to submit the relevant UNESCO documentation: No Periodic Report has ever been published on the official website.[29] As a result, UNESCO, researchers and decision makers lack a transparent basis for adequately assessing the park's conservation status.



Fig. 9: An inaccessible area in the NKMN Park. *Photo: Willy Kenning*[34]

There is a lack of resources for firefighting, as well as insufficient staff to manage the park. The number of personnel, 21 park rangers in 2022, is inadequate for the vast area of 1,523,446 ha encompassed by the national park. Moreover, many fires occur on the park's plateaus, which are difficult to access on foot and where long-distance communication is hindered by poor signal reception (Fig. 9). Park rangers report unacceptable working conditions as they attempt to combat fires with inadequate equipment, unpaid wages, and no food.[30] They further accuse the Deputy Ministry of Civil Defense of failing to coordinate emergency responses, excluding them from operations, and neglecting to provide basic resources or official information.[31]

Conclusion

Protection of the NKMNP must be a matter of international concern as it encompasses an ecosystem of exceptional global value, covering an area roughly the size of Northern Ireland. Its destruction would be irreversible, so action must be taken before it is too late. The Noel Kempff Mercado National Park World Heritage Property must urgently be put on the agenda of the World Heritage Committee.

The World Heritage Committee must:

- Raise international media scrutiny on the Noel Kempff Mercado National Park to increase pressure on actors driving deforestation and fire-related degradation.
- Monitor the Park's status and management more closely.
- Establish clearly defined buffer zones, involving local communities and NGOs to reduce agricultural fire risks.
- Consider the site's inscription on the List of World Heritage in Danger.

We urge SERNAP to:

- Take action in fire-fighting and prevention through combating man-made causes of fires.
- Provide public, transparent and up-to-date information on fires and illegal activities.
- Increase staffing and improve strategic management. Involve NGOs, local populations, and park rangers in all actions.

We urge the State Party of Bolivia to:

- Establish a coordinated cross-border programme with Brazil to address shared fire sources and illicit activities.
- Secure legislative changes to increase the penalties for illegal deforestation arson, narco-trafficking and land grabbing.
- Strengthen law enforcement through increased surveillance.

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Mining Threats to the Mount Nimba World Heritage Site in Guinea

The IUCN ARRC Task Force

Straddling the borders between the Republic of Guinea (hereafter Guinea), Liberia, and Côte d'Ivoire, the Nimba mountain range includes some of the highest peaks in West Africa. It holds a wide variety of vegetation types due to its diverse geomorphology, and an exceptional biodiversity (Fig. 1), including high levels of floral and faunal endemism. It is also known as the '*tower*' of West Africa, where more than 50 watercourses originate, supplying water for numerous local communities (Fig. 2). The Nimba Mountains also play an important regional role in both climate regulation and carbon sequestration.



Figure 1: The Nimba Strict Nature Reserve harbors many endemic and threatened species, such as the Critically Endangered Western Chimpanzee. *Photo: Kathelijne Koops*



Fig. 2: The Nimba Mountains are also considered the water tower of West Africa. *Photo: Maegan Fitzgerald*

For these reasons, the Nimba mountain range in Guinea and Côte d'Ivoire was designated a World Heritage Site (WHS) in 1981–1982, in addition to being a Strict Nature Reserve and a Biosphere Reserve. It is also recognised as an Important Bird Area (IBA), Key Biodiversity Area (KBA), and Alliance for Zero Extinction (AZE), further highlighting its importance for biodiversity conservation globally.

At the same time, this transboundary massif also holds a significant iron ore reserve that has undergone exploitation on its Liberian side, leaving permanent scars visible from space. In Guinea, part of the WHS was de-gazetted in 1992 to allow for mining activities, a permit currently owned by Ivanhoe Atlantic - Société des Mines de Fer de Guinée (SMFG) (Fig. 3). The site has since then been added to UNESCO's List of World Heritage in Danger, notably given the threats of mining to the site's Outstanding Universal Value (OUV). Several other mining permits have been granted within the Nimba landscape in recent years, including another mining permit abutting the WHS currently owned by the Nimba Development Company (NDC).

The most sensitive mining permit is the one being developed by SMFG, given that there will be unavoidable impacts to the OUV of the WHS property. The permit owned by NDC could also have major environmental and biodiversity impacts, but if the project applies best practice standards, these impacts could be significantly reduced. NDC has not yet submitted its ESIA, so we cannot currently judge and comment on its mitigation strategy.

Potential mining impacts on the WHS

The proposed mining activities by SMFG will have both direct and indirect environmental and biodiversity impacts, with the indirect impacts potentially extending far beyond the permit boundaries. Direct impacts include habitat loss, disturbance, degradation, and fragmentation, as well as potential soil, water, and air pollution. Indirect impacts include improved access to the area, an influx of people looking for work and to conduct business in the area, which will in turn exert pressure on natural resources through hunting, farming, etc. These impacts have been recorded for all other mining projects in Guinea.

Current status of mining permits

The two mining companies (i.e., NDC and SMFG) have submitted the Terms of Reference (ToR) for their Environmental

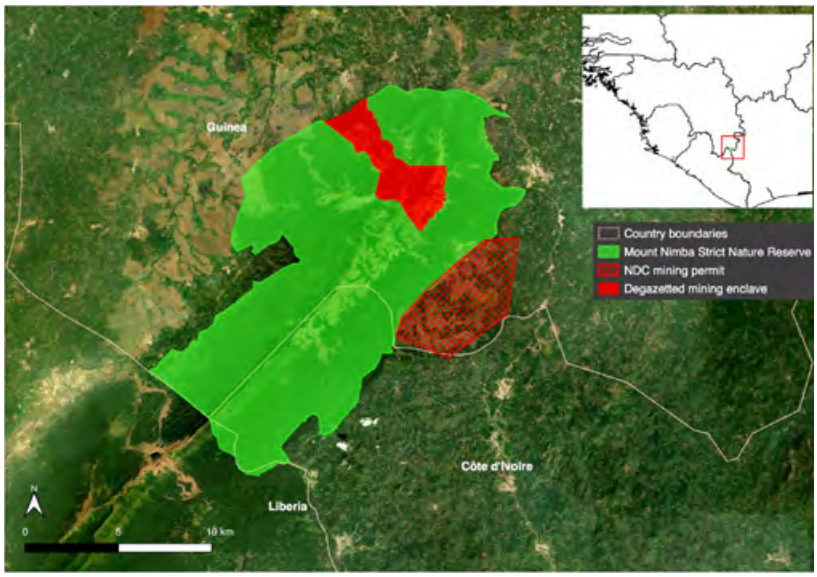


Fig. 3: The Mount Nimba Strict Nature Reserve, the only WHS in Guinea. Highlighted in solid red is the area that was degazetted in 1992 to allow for mining activities and currently owned by SMFG. Also shown (hatched red) is the other closest mining permit abutting the WHS, which is owned by NDC *Map: ARRC*

and Social Impact Assessment (ESIA) to the government. These have also been reviewed by a third independent body, the Netherlands Commission for Environmental Assessment, which has published its comments on their website. Only SMFG has submitted its completed ESIA for phase 1 of their operations, which is equivalent economically to c.1% of the revenue of the neighboring Simandou iron ore project developed by Rio Tinto (ARRC Task Force & Sustain Value, 2025)[1].

Contrary to what was written in the latest State of Conservation by the State Parties, the ARRC Task Force was not approached to review or comment on the ToR for the ESIA for both companies. The ARRC Task Force has only provided comments to the AGEE (Agence Guinéenne d'Évaluations Environnementales) on the ESIA from SMFG. We focused our comments on the potential impacts of the proposed SMFG project on the Critically Endangered Western Chimpanzee (*Pan troglodytes verus*). UNESCO has not provided comments on the ToRs, and it remains unclear if they have received SMFG's ESIA.

We have seen the report of public consultations available online undertaken by the AGEE in the villages within the impacted area of the SMFG project. We were surprised by the high acceptability rate (c.96-100%) amongst the local population. We feel these results are inherently flawed given that the local population mainly receives information from the project, which is biased towards the positive aspects of the project (e.g., job creation), without a proper understanding of all potential social and environmental impacts on the affected communities.

The ARRC Task Force position and recommendations

The ARRC Task Force was first contacted by SMFG in 2020 to align with the International Finance Corporation's (IFC) Performance Standard 6. We declined to engage given the unavoidable impacts to the OUV of the property, with our reasoning provided here.[2] The phase 1 proposed by SMFG is of short duration (c.10 years) so it is not economically sustainable for the area, while holding unavoidable and irreversible impacts to the OUV of the property (as highlighted in SMFG's ESIA). Therefore, in 2025, alongside six other NGOs, we submitted a request for a 5-year renewable moratorium on mining activities within the Nimba Biosphere Reserve. We suggested this period be used to:

- Conduct a Regional Strategic Environmental and Social Assessment (which has been solicited by UNESCO since 2010);
- Better understand the risk of epidemics and disease spillover linked with planned mining activities which would disturb the biodiversity equilibrium of the Nimba Mountains;
- Assess and secure alternative financing options for the long-term protection of the WHS; and
- Finalize and implement the Mount Nimba Biosphere Reserve Management Plan, including appropriate habitat protection and restoration measures for Endemic and Critically Endangered species.

More generally, we would also advise that the State of Conservation Reports be reviewed by an independent committee to ensure the accuracy of the information provided. Currently, this WHS also lacks consistent and robust population monitoring using the same methods and survey effort to accurately understand potential impacts and trends of fauna and flora. The 2025 State of Conservation Report mentions that the chimpanzee population fluctuates; however, firstly, the population estimate mentioned therein is inaccurate, and secondly, the population numbers given for the different years cannot be compared directly as not the same methods and survey effort are used.

The Nimba Strict Nature Reserve should remain on the 'In Danger' list as long as the mining threats persist. The ideal scenario favors nature over mining and values the ecosystem services the site provides not only for local communities and the sub-region, but for Guineans as a Nation. Given that Guinea has only one World Heritage site but many iron ore deposits, we feel this site should continue to be protected and used by other mining companies in Guinea to offset their impacts on biodiversity, as only a few offset options remain in the country.

Notes

1 ARRC Task Force and Sustain Value (2025). A World Heritage Site in Danger: Alternatives to Mining Mount Nimba. IUCN SSC PSG SGA. 51pp https://arrctaskforce.org/wp-content/uploads/2025/08/NimbaReport_FINAL_EN.pdf

2 https://arrctaskforce.org/wp-content/uploads/2025/01/ARRCstatement_SMFG_September2020.pdf

The Unresolved Issue of the Selous Game Reserve

Günter Wippel, uranium network

In 2009, Australian company Mantra Resources had discovered a uranium deposit in the headwaters of the Mkuju river, in the southwestern part of the Selous Game Reserve.

Exploration for mineral deposits in a WH site was not prohibited by Tanzanian standards whereas mining in WH sites is not accepted by UNESCO policy – a setting which provokes calamity in the first place: no company would invest substantial amounts of money to explore mineral deposits if there was no chance to be able to exploit a deposit later on.

Mantra did not have the funds to exploit Mkuju River uranium deposit; thus, the Australian parent company sold its Tanzanian subsidiary Mantra Resources in 2010 to a combination of subsidiaries of Russian state-owned company Rosatom, UraniumOne and ARMZ[1].

The WH Committee remained firm in its position that mining in a WH site is not acceptable. On its 2012 session in St. Petersburg, a suggestion was made to cut out a small area where the Mkuju River uranium deposit is located, from the WH site in order to allow Rosatom´s subsidiaries to mine the deposit. Under strong pressure from the Russian host and president of the session, the Committee adopted the suggestion „in an exceptional and unique manner“[2], although the decision was controversial.

According to the then Environmental and Social Impact Assessment, mining should be performed by a – unusual – combination of underground and open-pit mining, both of which would put the headwaters of the Mkuju River system at risk of radioactive and toxic contamination.

With the 2011 Fukushima-Daiichi disaster, the demand for uranium dropped and its price fell drastically for a decade.[3] Mining uranium became unprofitable for the Mkuju River deposit. Only a small test mine was started to explore the possibility of in-situ leaching (ISL); the companies then announced the intention to change the mining method to ISL which was advertised as ‚environmentally friendly'. In fact, ISL is a cheaper mining method, not a more environmentally friendly one.

By 2014, the WHC decided to list Selous Game Reserve as „in danger“ due to a number of risks, among them decline of wildlife, prospecting and mining, uranium mining, and a proposed dam construction.[4] Exploration activities may have made access to the WH site easier and thus have contributed to poaching and the decline of wildlife.

By 2017, Rosatom's subsidiary UraniumOne applied for a suspension of the project due to a depressed uranium price, postponing it „for at least three years“ [5].

In 2019, then president Magafuli announced the cut-up of the Selous Game Reserve into two parts[6], ignoring the WH Committee which was not consulted in any way. The reason behind this were plans to construct a major dam at Stiegler's Gorge for electricity production.

UNESCO's WH Committee protested repeatedly and strongly. However, the Tanzanian government went forward with its plan, flooding 1,200 square kilometers (460 square miles) of the Selous Game Reserve. Filling the reservoir began in 2023, and was completed in 2025.

Latest developments ...
... re: Julius Nyerere Hydro Project

In 2024, heavy rainfalls led to an emergency release of water and flooding of villages downstream, causing severe damages to homes, crops, bridges and infrastructure.[7]

As of April 2026, the project is operating under 40% of its capacity – due to a lack of transmission lines the electricity produced cannot be disseminated.[8]

... re: Mkuju River Uranium Project

In November 2024, The Citizen reported that the government announced a Strategic Environmental Assessment (SEA) would be undertaken in regard to the Mkuju River uranium mining project.[9]

In May 2025, media reported that Tanzania's president Samia Suluhu Hassan ordered the „fast-tracking of the uranium project to enable Nuclear Energy Production.“

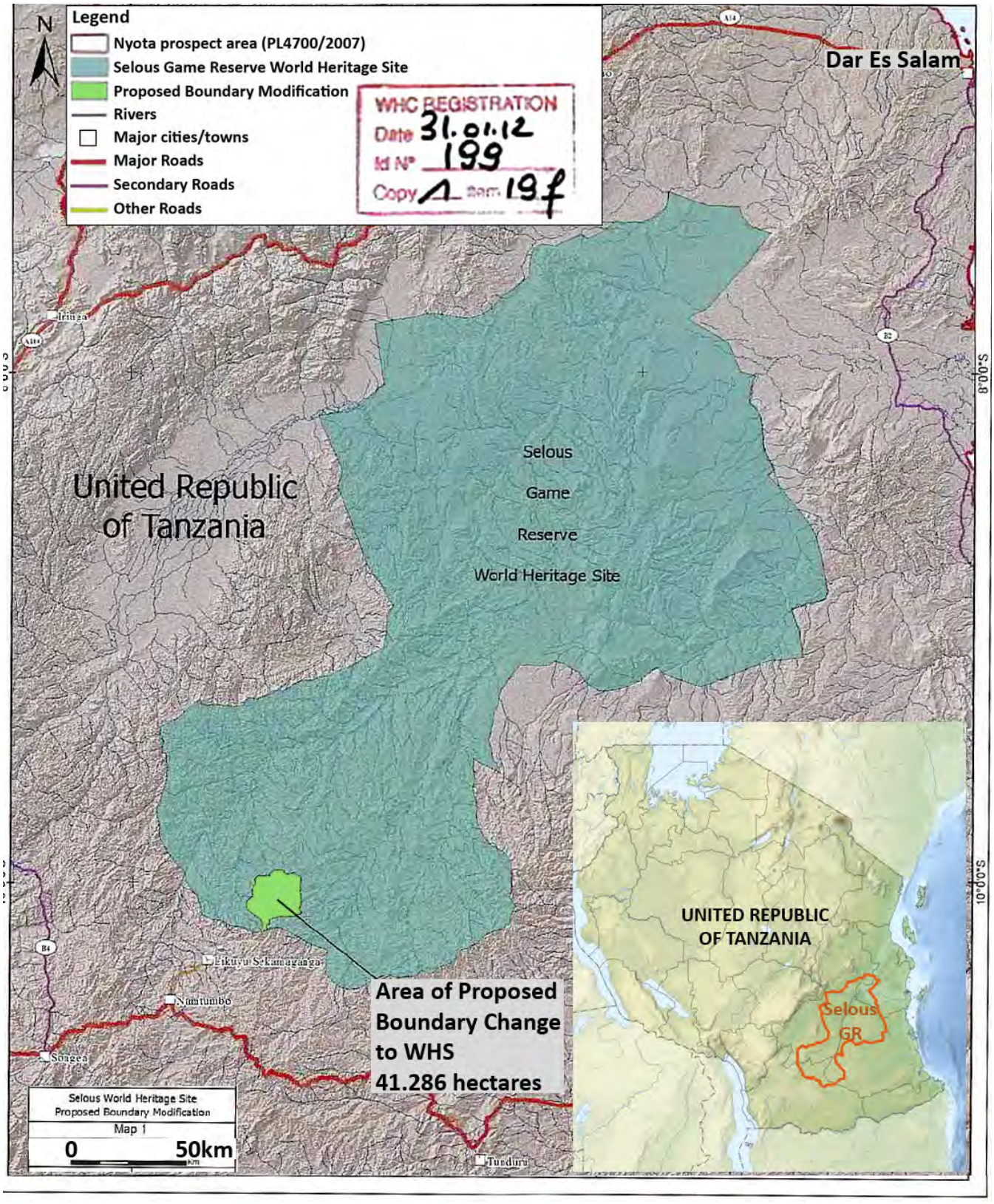


Fig. 1: The area of the planned Mkuju river uranium mine which was excised from the Selous Game Reserve. Map: Mantra Tanzania Ltd. / MTL Consulting / epoch

It remains unclear how uranium mining shall enable nuclear energy production since a number of steps, requiring complicated technology (conversion, enrichment, fuel rod production) as well as a nuclear power plant are necessary to ‚enable nuclear energy production;' all of these steps are available in the industrialized countries of the Northern hemisphere only and are under scrutiny of the International Atomic Energy Agency (IAEA) due to the possibility to use enrichment for building nuclear weapons.

In June 2025, a pilot uranium processing plant was inaugurated at Mkuju River Project in the presence of Tanzania's President

Samia Suluhu Hassen, the Russian Ambassador Avetisyan and UraniumOne's CEO.[10] The – alleged – future advantages for Tanzania in terms of jobs and tax income as well as from a 20% stake of the government in the operation were highlighted.

„The president assured the public that the project would comply with both national and international legal standards. She called on all relevant government agencies to ensure that environmental protection is prioritized, noting that Tanzania could learn from countries like Namibia …"[11]

The problematic vicinity of the mining project to the Selous Game Reserve was not addressed at all. Impacts of the mining activities on the Rufiji River system and the Selous Game Reserve remain unclear.

Another challenge will be the transport of uranium oxide („yellowcake") from the Mkuju River Project to the Northern hemisphere for further processing: No port on Africa's east coast holds a license for handling radioactive material. The only other uranium mine in the area, Kayelekera mine in Malawi, transports its final product, yellowcake, 3,500km by truck to Namibia's Walvis Bay – a hazardous journey also in regard to the environment.

In a 2025 Conservation Outlook Assessment, IUCN summarizes:

> „(iii) despite the Committee repeatedly urging the State Party to halt any prospecting or other mining developments within the property, the situation remains less than clear even when ignoring the Mkuju River uranium mine;
>
> (iv) repeated requests to clarify the status of planning of hydropower projects often remained;
>
> unanswered and impact assessment processes were not adequately completed;
>
> (iv) the Julius Nyerere Hydropower dam construction has been finalised despite the Committee's position that the project would be "incompatible with World Heritage status" with significant concerns expressed repeatedly; and
>
> (v) the repeatedly requested Reactive Monitoring mission was not invited for several years."[12]

In 2024, UNESCO had started a program to develop „a specific strategy aimed at developing the desired state of conservation for the removal of these sites from the list of World Heritage in Danger." [13] It remains to be seen whether the program can help removing Selous Game Reserve from the "in danger" – list and reinstate its full status as a World Heritage site.

In the author's view, it would be disastrous to remove one of Africa's largest World Heritage sites from the list — not only for humanity's heritage but also for Tanzania, which should take decisive steps to improve the situation.

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6 GOVERNMENT NOTICE NO. 923 published on 29/11/2019

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New Serious Concerns Over the Management of Mosa-oa-Tunya / Victoria Falls WHS[1]

Anonymous author

At the end of December 2025 the State Parties of Zambia and Zimbabwe submitted a new State of Conservation Report (State Parties, 2025a) together with the new 2025–2030 Draft Joint Management Plan for the Victoria Falls World Heritage Site (State Parties, 2025b).

The Report yet again fails to present visitor numbers to the site and significantly also fails to notify the committee of recent tourism developments within the site's Highly Ecologically Sensitive Zone (HESZ) or 'no new development zone'. The Draft Joint Plan is of particular note for the extensive delays in its submission and contradictions, errors and missing details in relation to the proposed revised management zonation for the site (KVFW, 2026).

The Joint Plan was prepared by the same independent consultant who also prepared the Zambezi/Victoria Falls National Park General Management Plan (ZPWMA, 2023, approved April 2024) and the Victoria Falls City Council Master Plan Report of Study (VFCC, 2024), with an aim to aligning all documents. The draft Joint Plan appears, however, to have been substantially undermined by subsequent amendments made by the State Parties prior to submission to UNESCO. The changes mostly relate to the management zonation for the Zambian side of the World Heritage property – made to align with the new draft Mosi-oa-Tunya National Park GMP, but with the result that the draft Joint Plan now no longer aligns with the already approved Zimbabwean National Park plan.

Nothing to report?

As with other recent State of Conservation Reports (State Parties, 2024) there is no presentation of visitor numbers to the site and no disclosure of growing number of recent tourism developments within the south-bank section of the WHS HESZ which supposedly prevents all new infrastructure developments (with the exception of infrastructure essential to the management of the site). These developments have been extensively documented in our previous reports (KVFW 2023; 2024; 2025). The continued lack of disclosure in relation to these developments ignores the World Heritage Committee's repeated requests for information relating to recent developments within the south-bank HESZ (World Heritage Committee, 2023; 2024).

Despite repeating their commitment to implementing the recommendations of the 2022 Reactive Monitoring Mission (World Heritage Centre, 2023) the State Party of Zambia appears to indicate that there will be no further action to address planning infringements and mitigations requested in the RMM Report relating to the controversial Mosi-oa-Tunya Resort development. The State Parties position therefore ignores the recommendations of the RMM Report and repeated in the requests of the Committee (World Heritage Committee, 2023; 2024). This is after it was reported in 2024 that Zambia had commenced implementing mitigation measures and that a revised ESIA had been initiated (State Parties, 2024).

Half-a-million visitors

Zimbabwe recorded 394,681 visitors to the south-bank 'Rainforest' over 2024, including 295,084 international visitors (Zimbabwe Tourism Authority, 2025). The total for 2024 is just short of the record high of 397,436 visitors to the Falls recorded in 2019 (and which included 310,732 international visitors). Across the river Zambia recorded 170,402 visitors to the north-bank visitor park, including 45,023 international visitors, down from the 227,000 recorded in 2023 and including 51,126 international visitors (Zambia Tourism Agency, 2025). The figures indicate a new record total of 565,083 visitors to the Falls in 2025. They also mark only the second time that the Falls have received over half-a-million visitors in two consecutive years, raising concerns over the carrying capacity of the Site and current drive to expand accommodation on the south-bank (Victori Falls Bits and Blogs, 24th March 2026).

Modified management zones

Rather than presenting the map already approved by Zimbabwean authorities and published in the 2024 Zimbabwe National Park General Management Plan (ZPWMA, 2023), the

1 An extended version of this report, together with further information, downloads and links to key documents is available from the Keep Victoria Falls Wild website (www.keepvictoriafallswild.com).

2 The author is known to, and can be contacted through, World Heritage Watch.

2025 State of Conservation Report instead presents another new map (Fig. 1) of the WHS, presumably prepared by Zambian authorities (State Parties, 2025a). The map yet again shows revised management zones for the WHS, significantly amending north-bank zones and appearing to reflect existing (and presumably planned) tourism utilisation rather than conservation importance or heritage value. The changes appear to re-designate significant areas on both sides of the Falls currently protected under the HESZ designation under the 2016 Joint Plan to the yellow 'Sustainable Development Zone,' despite the commitment made in the 2016 Plan only to make changes to the zones which improve the conservation protections for the WHS (State Parties, 2016).

The corresponding section on zonation within the Joint Plan is mysteriously a blank page, the page numbering of the document indicating that four pages (from pages 29-32) are blank or missing from the document. Reference to the contents pages indicates three maps are also missing. It is fairly evident therefore that the content of these pages have been intentionally removed from the document before its submission to UNESCO. The lack of detail on the zones comes after a specific request for the boundaries, zonation and buffer zone to be reviewed in the new document (World Heritage Committee, 2023; 2024). It should also be noted that the map shows the incorrect boundaries of the south-bank Zambezi and Victoria Falls National Parks and corresponding Council-controlled area.

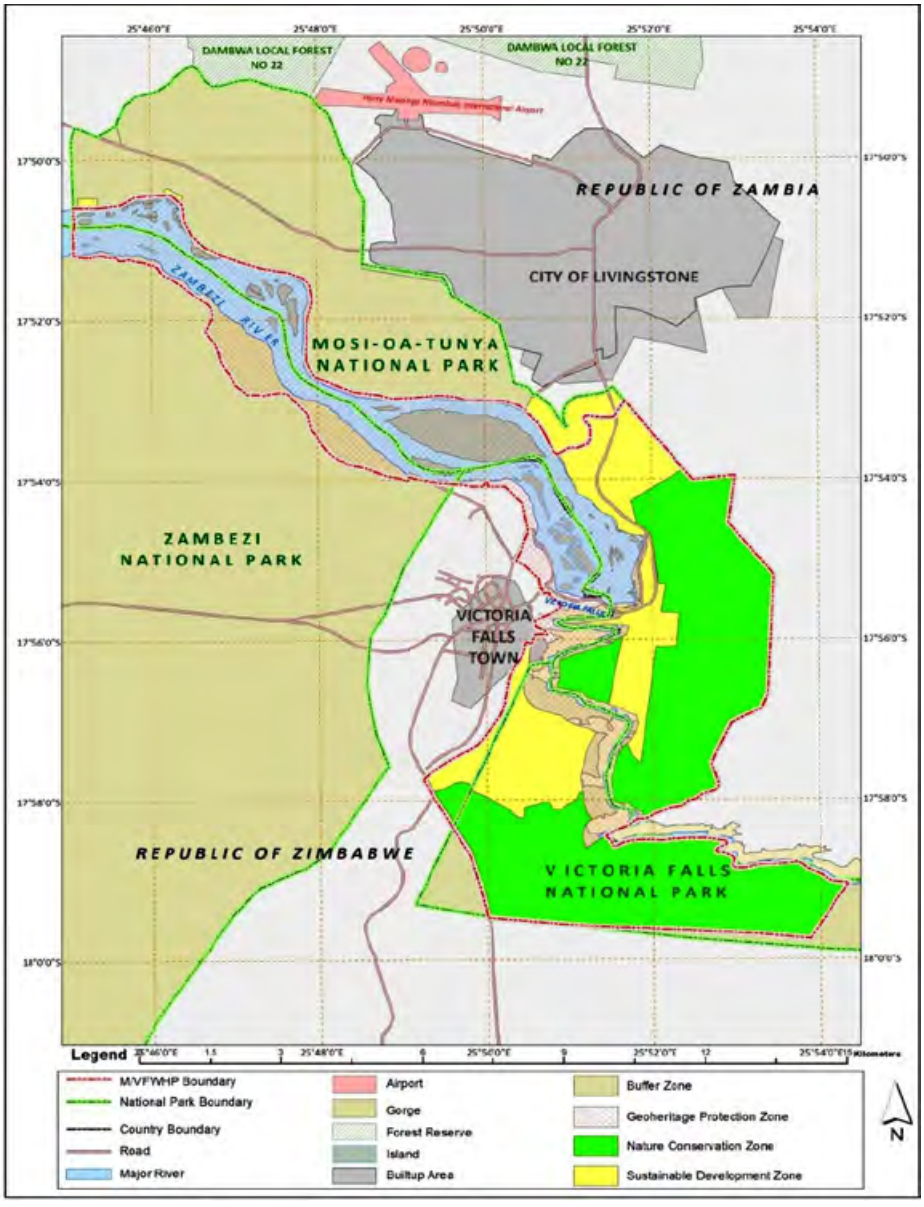


Fig. 1: The map also presents an amendment of the management zone names and definitions, the 'red' HESZ becoming the 'Geoheritage Protection Zone,' and appears rather confusingly to swap the colour coding for the remaining two zones, with the yellow MESZ becomes the green 'Nature Conservation Zone' and the green LESZ becomes the yellow 'Sustainable Development Zone'. To add to the confusion the colour of the south-bank zones have not been updated and the previous zone names are retained elsewhere within the report (KVFW, 2026).

Conservation Outlook Assessment

In October 2025 the IUCN/World Heritage Centre published an updated Conservation Outlook Assessment for the Site (IUCN, 2025). The report's summary of the site's conservation outlook as "good with some concerns," appears at odds to the detailed analysis of the threats facing the site, with a growing list of issues assessed as being of 'high threat,' including tourism infrastructure developments and activities and urban growth pressures. The assessment also appears to conflict with the repeated comments and warnings from the Committee over the cumulative impact of developments and need to disclose developments in full before they are approved (World Heritage Committee, 2023; 2024).

A red line

Recently published research has revealed a previously designated south-bank 'no new development zone,' covering the core section of the VFNP and also an additional area of Council-controlled land, 'restricted permanently' from all new development under the 1975 Victoria Falls Outline Plan (Roberts, 2026; Fig. 2). This protected area has not been fully disclosed by the State Parties and raises further questions over recent and proposed developments in the WHS HESZ and surrounding 500 metre Buffer Zone. The protected zone is not fully recognised or maintained in the recent Victoria Falls City Council Master Plan.

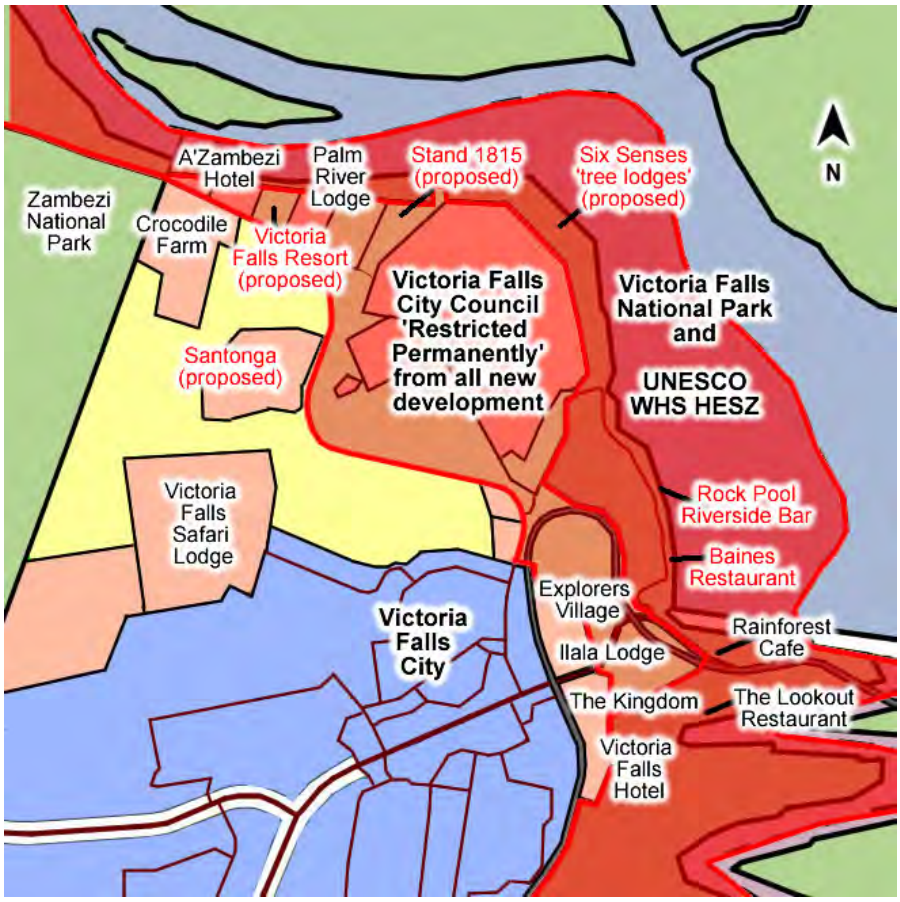


Fig. 2: The south-bank 'permanently restricted' no development zone as designated under the 1975 Outline Plan together with associated developments (recent and proposed developments in red).

The area of the south-bank VFNP above the Falls is protected as a National Monument and National Park, restricted permanently from development under the 1975 Council Plan and the WHS HESZ, as well a being a Ramsar Site of International Importance. The red line against new development, established on the south bank in the mid-1970s, must surely be maintained and enforced. Anything less than this is a failure of the World Heritage system and of the State Parties' commitment to protect and preserve the environment of the Falls for future generations.

- repeated failure to notify the Committee of proposed developments before they are agreed;
- substandard and incorrect Environmental Impact Assessments;
- concerns over the implementation of planning regulations and restrictions in relation to recent developments in 'red' no development zones; and
- the failure of the legal system to recognise the protected area and resolve the issue of the recent riverside developments through legal process (three years and still unresolved).

Urgent action needed

We urge the World Heritage Committee to take decisive and definitive action to address the widespread and increasing concerns over the management of this site, with ongoing unresolved issues relating to:

- the definition and delimitation of the site's boundary, management and buffer zones;
- alienated land within the site under third-party management and associated developments (eg. transport corridor, ZESCO area);
- significant issues relating to reporting and monitoring of visitor numbers and concerns over the carrying capacity of the Site;

The Draft Joint Integrated Management Plan submitted by the State Parties should be rejected and a final complete and consistent document requested as soon as possible. The State Parties should be specifically requested to disclose the 1975 protected area and consider its inclusion within the revised Site boundary modification request.

Due to the increasing concerns over the management of the Site and threat of further unsuitable tourism developments a moratorium on all tourism developments within the WHS and surrounding 500m Buffer Zone should be requested pending final submission, and approval by the Committee, of the revised Joint Plan.

The permits for recent illegitimate tourism developments issued by the Zimbabwe National Park Authority within the WHS HESZ must be cancelled and all trace of illegitimate developments removed from the Site. This specifically relates to the Baines Restaurant and National Park 'Rock Pool' developments and the proposed Six Senses 'tree lodge' and Kandahar Camp developments.

A full and detailed review of all existing tourism infrastructure developed within the site and surrounding 500 metre Buffer Zone since inscription, reviewed against the original EIA approval conditions for each development, is also urgent, including the redeveloped Lookout Cafe, recent Malachite Suites development and expansion of upstream riverside lodges.

Tours to Cataract Island should be suspended pending submission and approval of a full Environmental Impact Study and establishment of baseline and ongoing monitoring on the impacts of visitors on the fragile ground flora of the island, as originally requested by the Committee in 2017 (World Heritage Committee, 2017) The abseil activity must similarly be suspended pending full disclosure and submission and approval of a detailed EIA.

The Committee will have to decide if the State Parties statement on the Mosi-oa-Tunya Resort development is adequate. The 2022 Mission Report concluded that the Site's Outstanding Universal Values could be considered to be in danger if current development proposals proceed without the appropriate level of consideration for the environment (World Heritage Centre, 2023). The site should also be considered for immediate addition to the List of World Heritage Sites in Danger if the State Parties fail to adequately address the above issues.

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Threats Endanger the Freshwater OUV of Doñana National Park, a World Heritage Site

Juanjo Carmona and Teresa Gil, WWF Spain

The 2024-2025 hydrological year was the first considered wet in Doñana National Park since 2010-2011, with 671 mm of rainfall. These thirteen years have been the driest period since records began (1970).

This good news has served to reinforce both the serious problems this World Heritage Site is facing and its potential for recovery.

Doñana is heading towards collapse not due to a lack of scientific knowledge or plans to solve its problems, but rather due to a lack of will and the slow implementation of the necessary actions that have already been planned.

Doñana marshes: A year of contrasts

Between September 2024 and the end of January 2025, approximately 300 mm of rainfall were recorded in the heart of the National Park. This figure is within the average values for a winter in Doñana and higher than the average of the last ten years. However, the water surface, although extensive, was shallow.

This situation has allowed for a recovery in the number of wintering waterfowl in Doñana, which reached 240,531 individuals in January 2025, compared to 43,989 in January 2024, the lowest figure recorded in these censuses. Even with this recovery, the January 2025 census is the third worst in the last 25 years.

This situation contrasts sharply with the data from the spring breeding season, which in some cases broke positive records in terms of the number of chicks hatched for certain species. This was due to an exceptional event: during the month of March, approximately one-third of the total rainfall for the hydrological year fell. Compared to a historical average of around 60 mm for March, this year's rainfall almost reached 250 mm. The April rains, which were within the average range, helped maintain exceptional flooding, allowing threatened species such as mar-







Fig. 1: Different extension of water cover in Doñana National Park on a) 18 November 2025, b) 14 February 2026, and c) 17 April 2026. *Images: WWF / Sentinel 2 L2A True Colour*

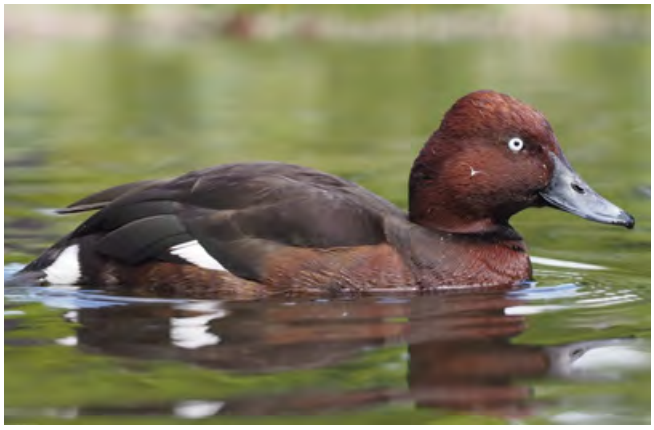


Fig. 2: The Ferruginous duck (*Aythya nyroca*) prefers quite shallow fresh waterbodies or saline or brackish pools or wetlands as to be found in Doñana.
Photo: Francis C. Franklin / wikimedia commons

bled teal and ferruginous duck to breed within the protected area.

Rainfall in 2025, especially that of January - April, has been the best evidence that the marshes and the species that depend on them would improve their situation if the water flows that have been diverted from the National Park over the last four decades were restored. That is why it is even more urgent, if possible, to demand that the Spanish Government implement the restoration actions of the hydrological network that flows into the National Park, especially those of the Guadiamar river basin, the river of Doñana.

The structural deterioration of the Doñana marshland cannot be resolved with current data -even extraordinary ones - like those from this hydrological year but if the planned actions are carried out, it is possible to improve the wetland's situation in the long term.

The aquifer: unchecked deterioration

Decades of overexploitation, mainly linked to the expansion of industrial agricultural production for export, have caused the groundwater levels of the Almonte-Marismas aquifer to drop to historic lows.

The Doñana Aquifer Status Report (hydrological year 2024-2025) indicates that, despite this year's abundant rainfall, 10 of the aquifer's 16 sectors are in a situation „worse than the average rainfall". This demonstrates that the precipitation has not translated into a substantial improvement in the aquifer's condition; on the contrary, water extraction exceeds the average rainfall, even in a wet year like the last one.

While the short-term situation is very worrying, long-term indicators show the aquifer is practically on the verge of collapse, as WWF has been demonstrating in the last years. Of the 16 sectors, 14 show a statistically significant long-term decline, demonstrating the aquifer's condition, which, far from recovering, continues its progressive deterioration. In the 2012-2013 hydrological year, 7 of the 16 sectors showed downward trends; by 2022-2023, this figure had reached 14, and it has remained at this level even though, theoretically, extractions have decreased by 10.5 hm^3 since 2015 due to land purchases and the substitution of groundwater with surface water in irrigated agricultural operations.

It is worth recalling that the WWF Spain report, „The Water that Nourishes Doñana," indicates that at least 106 hm^3 of water are extracted from the aquifer annually, compared to an estimated average recharge of 97 hm^3. This data indicates that the actual exploitation rate of the aquifer is 109%, and that more groundwater is being pumped than is being recharged in the Almonte-Marismas aquifer. This high level of overexploitation is causing significant drops in the water table and in the flow into the streams that feed the marshlands.

The Spanish state threatens the survival of Doñana's freshwater marsh

The Spanish government through the Ministry for the Ecological Transition and the Demographic Challenge has carried out an administrative procedure (demarcation) to determine the area of the National Park's marshes that are tidal (saltwater) and, therefore, state property.

What should have been a procedure based on decades of accumulated scientific knowledge in Doñana has resulted in an arbitrary decision lacking technical foundation, supported only by a small number of state agencies - others, as we will see below, oppose and question it. The state considers that two-thirds of the National Park's marshland is not a freshwater wetland, but a tidal marsh, subject to flooding, and that if this flooding does not occur, it is due to man-made obstacles that must be removed.

What the State considers a mere administrative act to classify these lands as state property by deeming them public maritime-terrestrial domain will, in reality, have a very serious and irreversible impact on the marsh ecosystems, including the Doñana Biological Reserve, its heart and declared a National Park in 1969 for its environmental value as a freshwater wetland.

WWF Spain's concern is shared by other state agencies such as the Doñana Biological Station and the Guadalquivir River Basin Authority; regional bodies such as the Regional Government of Andalusia and the Doñana Natural Area Management; and the affected municipalities. All of them have objected to the criteria established by the Spanish Government for the demarcation. This concern is supported by virtually all members of the Doñana Natural Area Participation Council, who voted on October 16, 2025, in a resolution expressing their opposition

to the demarcation procedure. The Participation Council considered that the criteria on which the State's decision is based are incompatible with scientific knowledge, management plans and the physical reality of Doñana.

Furthermore, nearly 300 scientists from across Spain have joined the manifesto, coordinated by WWF, calling on the Spanish Minister for Ecological Transition and Demographic Challenge, Sara Aagesen, to reverse the approved boundary demarcation for Doñana.[1] The signatories urge Aagesen to "also listen to science, suspend the approved demarcation, and establish an independent scientific and technical committee to develop a new proposal based on the extensive scientific knowledge accumulated about Doñana."

In the opinion of WWF Spain, this administrative decision obliges all public administrations to act in accordance with the provisions of the Spanish Coastal Law and to restore what the State has declared as tidal marshes. In practice, this would mean the disappearance of the existing freshwater wetlands affected by this decision. A contradiction could arise: the manager of the World Heritage protected area would not implement the actions planned to protect the ecosystems of high ecological value protected by the European regulatory framework, and instead would be forced to facilitate the inflow of saltwater into these ecosystems. This is because the Spanish Government has determined that these ecosystems are located in areas that could suffer tidal flooding once the obstacles that currently prevent it are removed.

For WWF Spain, this situation may represent the greatest risk to the Doñana marshes since the development projects that threatened their existence in the mid-20th century -threats that ultimately led to the creation of the National Park. We believe that the Spanish State should suspend the demarcation process due to the presence of compelling reasons of overriding public interest, such as the protection of Doñana and its ecosystems, and the conservation of its flora and fauna.

Transforming the Doñana marshes from a pluvio-fluvial freshwater wetland into a tidal saltwater marsh would mean the destruction of much of the OUVs for which this site was designated a World Heritage Site – particularly those related to migratory birds that have found refuge in this wetland for generations.

Mining waste discharges into the Guadalquivir river

Town councils, farmers, fishermen, local economic, environmental, and consumer associations from the riverside communities along the Guadalquivir estuary have requested that the authorities suspend the planned discharges into the river by the Aznalcóllar and *Cobre las Cruces* mining operations, both located in the province of Seville.

They are invoking the precautionary principle, a cornerstone of European environmental regulations, as it is a matter of safeguarding the greater good ecological status of the estuary and its associated ecosystems – including Doñana National Park - and the numerous economic activities that depend on its waters, from inshore fishing to tourism, agriculture, and livestock farming, as well as the health of the people who live in the surrounding towns.

Several scientific studies conducted in recent years demonstrate that the Guadalquivir estuary is severely contaminated with metals that cause ecotoxic effects precisely in the area where the Aznalcóllar mine would discharge. High levels of metallic contamination have been recorded in fish traditionally consumed in the region. Furthermore, another study has shown that the *Las Cruces Copper Mine* has already severely contaminated the Guadalquivir River sediments after discharging wastewater, since 2008, using the same treatment system that the Aznalcóllar mine intends to implement.

1 See the full text of the manifesto here (in Spanish): https://actua.wwf.es/manifiesto-deslinde-donana

The Wadden Sea at Risk: Bottom Trawling and Fossil Fuel Exploitation in Marine Protected Areas

Deutsche Umwelthilfe

The Wadden Sea World Heritage is the largest unbroken system of intertidal sand and mudflats in the world, spanning Danish, Dutch and German coastal waters. It has been shaped by natural forces such as tidal patterns and currents since it originated about 7,500 years ago. Intensifying human activities in the 20th century have become the most important factor impacting this ecosystem. The Wadden Sea has seen a reduction of large predators such as groundfish, grey seals and harbor porpoises, and biodiversity overall, as 144 species amounting to one-fifth of total macrobiota have been made extinct or severely reduced. It has also seen the degradation of complex three-dimensional habitats such as mussel beds and oyster banks, seagrass meadows and reefs of the sand coral *Sabellaria spinulosa*.[1]

Recent conservation efforts have reversed some of the negative trends, but the pressure from human activities remains too high and is even increasing despite the Wadden Sea's protected status. After the World War I, crab fishing with motorised vessels and bottom trawls established itself as the dominant technique to catch the North Sea Brown Shrimp (*Crangon crangon*). This fishery is damaging the sensitive seabed, causing high levels of bycatch.

Recently, there has also been a rise in energy infrastructure developments and exploitation of gas, oil and sand. The effects of these activities are compounded by pollution, eutrophication, invasive species and climate change. The Wadden Sea World Heritage is far from being a pristine ecosystem, and management measures are urgently needed to conserve this special site. The German NGO Deutsche Umwelthilfe is taking action against bottom trawling and the exploitation of fossil fuels in the German Wadden Sea National Parks of Lower Saxony and Schleswig-Holstein, which are also EU Natura 2000 sites.

Bottom trawling inside the world heritage property

Failure to fulfil the legal obligation of protection

Germany is currently failing to effectively implement the EU Habitats Directive, the EU Nature Restoration Law, the EU Biodiversity Strategy and the Kunming-Montreal Agreement, which requires it to protect and restore the Wadden Sea. The systematic breach of Article 6 of the Habitats Directive (92/43/EEC) by German authorities is especially blatant. It holds that Member States need to take the required appropriate measures to maintain or restore habitats to a favourable conservation state (1), prevent a risk of habitat deterioration (2), and/or assess the risk posed by plans or projects on the integrity of the sites (3).

In April 2025, Deutsche Umwelthilfe, alongside the Environmental Justice Foundation (EJF), the Blue Marine Foundation, ClientEarth, and Défense des Milieux Aquatiques (DMA), filed a formal complaint to the European Commission regarding bottom trawling in marine protected areas in Germany, France and Italy.[2] Accoridng to Global Fishing Watch, even the protected habitat types of reefs, large shallow inlets and bays, and sandbanks were regularly fished with bottom trawls from 2020-2024. As of May 2026, the complaint is pending, and this destructive practice continues in the Wadden Sea National Park.

Significant damage caused to sensitive habitats and species in Wadden Sea

Bottom trawling functions by dragging nets across the seabed to catch ground-dwelling brown shrimp. A recent systematic review of the impacts in the Wadden Sea showed demonstrable ecological effects on benthic ecosystems, through physical seafloor disturbance and mortality of benthic organisms. The impacts affect the entire food web due to high bycatch rates, especially for juvenile fish.[3] This resulted in a loss of biodiversity and a shift in species composition due to the decline of large, long-lived species and an increase in small, opportunistic species. In addition, important biogeochemical processes were altered, resulting in a reduction of the sediment's carbon storage capacity. The most recent assessment for the EU Marine Strategy Framework Directive identified widespread bottom trawling as one of the key drivers of the unfavorable condition of German habitats and as having the "greatest impact on benthic habitats" in the North Sea.[4]

Evaluating the impact of bottom trawling activities is complicated by the "shifting baseline" phenomenon: Studies often take recent benthic communities as a baseline due to data availability, thus failing to capture significant and long-lasting changes that took place over the last century. The effects depend on the specific local context due to the dynamic nature



Fig. 1: Bottom trawling for brown shrimp in the Wadden Sea clearly physically disturbs the seafloor, leading to several ecological effects on benthic ecosystems. M. Stock/wattenmeerbilder.de

of the ecosystems and impacts from tides and currents. Regardless of the methodological challenges, it is clear that bottom trawling has had significant negative impacts on the Wadden Sea. This is also a problem for the fishery itself. More than a century of crab fishing in the Wadden Sea is having a negative effect on the recruitment of *Cragnon cragnon*, threatening the long-term stability of the population.[5] This underlines the urgent need for management measures of the crab fishery in the German Wadden Sea.

Lack of political will and action despite scientific and legal urgency

The problem of bottom trawling in marine protected areas in the Wadden Sea is neither new nor unknown, but until now no sufficient action has been taken. In Germany, a lack of political will, pressure from the fishing sector, and institutional fragmentation between the federal and the state level have locked in a state of ongoing breach of law and ecological degradation. This has been compounded by a lack of understanding for the severity of the degradation of the Wadden Sea, which is even at risk of losing its World Heritage status.

In 2024-2025 a confidential negotiation process concerning fisheries management and possible area closures in the Wadden Sea National Park took place in the state of Schleswig-Holstein, but ended without an agreement. A similar process has been initiated in the state of Lower Saxony in April 2025, but has not yet delivered any result. These intransparent processes are taking place behind closed doors, have no binding timelines, and are characterized by the unbalanced influence of industry stakeholders. Regardless of the scientific and legal urgency, it seems currently unlikely that political processes will deliver the necessary protection from bottom trawling for the Wadden Sea in Germany.

Fossil fuel expansion inside the World Heritage Property

Fossil Project "Mittelplate" (DE)

Harbour Energy currently operates the Mittelplate oil platform in a special fossil enclave in southern Schleswig-Holstein under a permit that runs until 2041. On top of the danger that the almost 40-year-old platform and the severe risks an oil spill would pose to the Wadden Sea, it has now become public that the operation of the platform has been unlawful since the early 2000s. In March 2026, a German court ruled that the operation was unlawful due to the absence of a mandatory assessment according to the EU-Flora-Fauna-Habitat-Directive. Harbour Energy has appealed the decision; the verdict in second instance has suspended immediate enforcement of the platform's closure. A decision on the legality of operating the platform is still pending in the main proceedings. In light of this revelation, we ask Germany to present a binding plan for an immediate phase-out of fossil fuel extraction in the Wadden Sea.

Fossil Project "GEMS" (NL-DE)

ONE-Dyas' GEMS/N05-A project about 20 km off Borkum is set to be expanded into a cross-border gas project targeting several Dutch and German fields, using multiple platforms[6] and threatening the Wadden Sea's Outstanding Universal Value.[7] While the Dutch permit was struck down by the District Court of The Hague in April 2024 and remains legally disputed, the German mining authority approved the project on 13 August 2024 and has since issued further operational approvals. The risks are substantial: damage to sensitive reef habitats, underwater noise exceeding German noise limits endangering passing porpoises seeking refuge in the WHS, the discharge of lead- and mercury-contaminated water, and seabed subsidence caused by extraction. The platform's accident probability of 0.25 is exceptionally high and remains unaddressed by any authority of Germany or the Netherlands.[8]

LNG-Terminals (DE, NL)

Three sites Liquefied Natural Gas (LNG) terminals are in operation or under construction in the Wadden Sea or its estuaries: Eemshaven, Wilhelmshaven (two Floating Storage and Regasification Units [FSRUs] and one planned onshore terminal) and Brunsbüttel (one FSRU and one planned onshore terminal). These result in increased pollution from oils, NO_X, SO_2, particulate matter, and methane, damage to fish stocks and disruption from increased shipping and construction. The FSRU in Wilhelmshaven uses chlorine to clean its seawater pipes, which

is particularly damaging. Seawater is also used in regasification and then returned to the sea at a warmer temperature. This affects lower trophic species' composition and fish behaviour. The extraction of seawater entrains fish and other organisms into the hull of the vessel, killing them. Not only has the Wadden Sea ecosystem been damaged by the construction of the current FSRUs (deepening of harbour facilities, construction of jetties, prolonged noise-intensive pile driving, maintenance dredging and laying of pipelines), but their operation and the planned onshore infrastructure will cause additional damage.[9]



Fig. 2: In Wilhelmshaven, the floating LNG terminal Höegh Esperanza operates with negative impacts on the Wadden Sea including chlorine and wastewater discharge. *Photo: Julia Dade / DUH*

Conclusion

The cumulative pressure on the Wadden Sea property, including from fossil fuel exploitation and bottom trawling, is too high and a risk for its World Heritage Status. We call upon the World Heritage Committee to recommend at its 48th session to reconfirm its earlier decisions and in particular to:

- *Request* Germany to carry out the missing environmental impact assessments for North Sea shrimp fisheries in its Wadden Sea protected areas, as stipulated by the EU Habitats Directive Article 6(3);
- *Call on* Germany to establish designated no-take zones, in accordance with international conservation standards, especially the IUCN rule that 75% of a protected area should be managed for its primary conservation objective;
- *Urge* the State Parties to implement Decision 45 COM 7B.23 and 46 COM 7B.51, notably to stop extractive activities such as oil, gas and salt in the vicinity or underneath of the property in particular the GEMS, Ternaard, Mittelplate and Ballastplaat projects;
- Request the State Parties to reject any future proposals for extractive activities inside or in close proximity to the property;
- *Request* the Netherlands and Germany to carry out the missing assessment of the GEMS project on the OUV;
- *Request* Germany to oblige Harbour Energy to put in place financial safeguards to ensure that the Mittelplate's oil platform is dismantled without damage to the property, and to commit to full transparency in this process, including the publication of the agreement between the regional government and the operator;
- *Urge* the State Party of Germany to immediately stop the LNG projects in Wilhelmshaven and Brunsbüttel, and to stop the use of biocides at the Wilhelmshaven terminal;
- *Call* on Germany to nominate the enclaves originally foreseen for fossil fuel drilling or extraction for inclusion in the property as soon as possible.

Notes

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9 https://www.duh.de/lng/ ; https://energy-terminal.de/de/terminals

Wind Farms and the European Beech Forests of Jasmund in Northern Germany

Martin Lenk, World Heritage Watch

World Heritage Watch

The core threat to the World Heritage property lies in the planned construction of massive industrial installations in its vicinity (wider setting), coupled with the planning authority's refusal to examine potential impacts on the OUV during this crucial planning phase.

Germany's energy transition – a jeopardy for cultural landscapes?

Germany's policy-driven Energiewende (energy transition) is interpreted very differently across stakeholder groups, yet its spatial consequences are undeniable. Wind and solar power require extensive land areas (Fig. 1), fundamentally altering the visual character of rural landscapes. This raises questions for the preservation and management of World Heritage properties under Germany's stewardship.

For decades, Germany protected the aesthetic quality of its landscapes through spatial-planning instruments (which prohibited urban sprawl), nature-conservation law and municipal design statutes. These forms of legislative self-restraint reflect a long-standing cultural understanding that attractive landscapes and settlements constitute a public good.

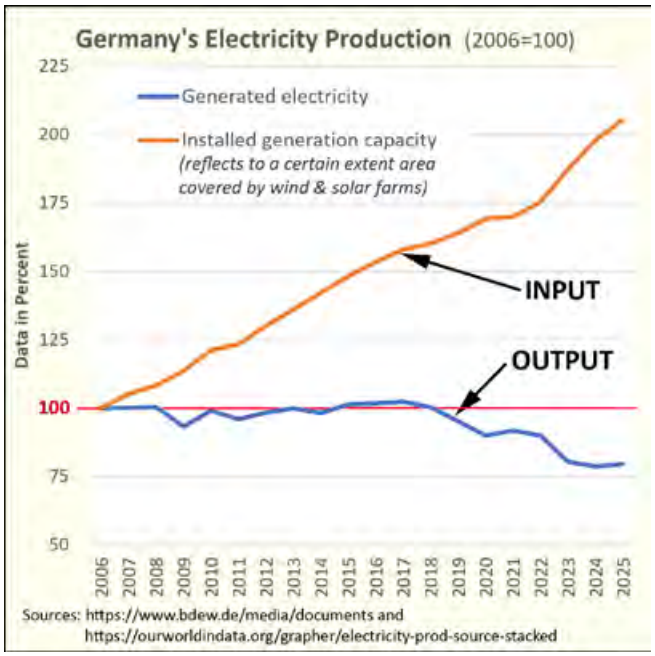


Fig. 1: Installed capacity and electricity production of Germany 2006-2025.
Sources: www.bdew.de/media/documents/Installierte_Leistung_D_ab_2000 and https://ourworldindata.org/grapher/electricity-prod-source-stacked, compiled by the author



Fig. 2: Landscape on Jasmund suggested for wind farm 008n/2024. Location: 54°32'24"N, 13°35'29"E. Photo: M. Lenk, 9 May 2026

Today, this ideal is increasingly challenged. The discomfort many people feel toward wind farms is captured in the expression "Verspargelung der Landschaft" ("asparagus-ification" of the landscape). At the same time, a shifting-baseline effect may lead younger generations to perceive the omnipresence of turbines as normal.

Rügen, Germany's largest island, has been celebrated for centuries for its exceptional scenic qualities — praised by Wilhelm von Humboldt, Caspar David Friedrich and others. The Jasmund peninsula embodies a unique identity-forming fusion of cultural and natural heritage. It is precisely **in this wider setting** as outlined in §112 Operational Guidelines (OG), o**f the Jasmund World Heritage** component that **a new wind-energy priority** area is now being **proposed**. The present article examines this development.

The new legal framework

The Renewable Energy Act (EEG), in force since 1 January 2023, declares the construction of wind turbines to be in the "overriding public interest." This gives wind-energy expansion substantial legal weight when balanced against heritage protection or nature-conservation concerns. At the same time, permitting



Fig. 3: "Last Chance Objection!" – a flyer by "Rügen against wind giants", a local initiative to mobilize stakeholders to submit concerns during the consultation process. Source: https://rügengegenwindgiganten.de/index.php/links/

procedures have been accelerated through strict deadlines and simplified review and participation requirements.

A recent case in Saxony illustrates the new legal environment: a wind-farm developer successfully challenged the rejection of a project located approximately 1.3 km from the buffer zone of the Erzgebirge / Krušnohoří World Heritage property. The Higher Administrative Court ruled in favour of the developer, despite concerns about visual axes (Case 1 C 2/24, 21 March 2024).

The Wind Energy Area Requirements Act (WindBG), effective since 1 February 2023, obliges federal states to designate 2.1% of their territory as priority areas for wind energy by 2032. By opting for equal territorial distribution rather than economic optimisation, the legislature has increased the likelihood of spatial and investment misallocations.

This rapid-expansion logic stands in contrast to the more deliberate principle guiding World Heritage protection — "World Heritage is forever." An interview with former Federal Environment Minister Steffi Lemke was published under the headline-quote: "We wanted too much too quickly" (Der Spiegel, 27 September 2024).

Yet in practice, **the required early notification** of the World Heritage Centre under §172 **is not carried out for winden-ergy projects at Jasmund**, nor are potential impacts on the Outstanding Universal Value (OUV) systematically assessed.

Regional Spatial Development Plan for Vorpommern

The Jasmund National Park (a component of the UNESCO World Heritage property Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe) falls under the jurisdiction of the Regional Planning Association of Vorpommern (RPVV), a public-law corporation. To implement the Wind Energy Area Requirements Act the spatial plan is currently reviewed.

World Heritage Watch has submitted statements during both stages of the public participation process (October 2024 and May 2026) to address concerns about two proposed priority areas for wind energy (007/2024 and 008n/2024), both located just outside the buffer zone, within shadow-flicker distance in the wider setting. Priority area 007/2024 meanwhile has been withdrawn.



Fig. 4: Map of UNESCO beech forest World Heritage site (Jasmund element) and proposed priority sites for wind farms. Sources: https://whc.unesco.org/en/list/1133, and Ref. 4, compiled by the author



Fig. 5: WH property Naumburg Cathedral (left part of photo) and wind farms. Photo: M. Beleites, 30 May 2015

The main lines of argument regarding 008n/2024 in our May 2026 statement were:

1. **World Heritage not considered in the environmental report**
   The environmental report does not mention the World Heritage property at all. A key protection asset (OUV) required under the UNESCO OG was not assessed, rendering the evaluation incomplete.
2. **Missing early notification under OG Paragraph 172**
   Germany did not notify the World Heritage Centre as required by § 172. This omits a central step of the international review process. No Heritage Impact Assessment was carried out, including no examination of development alternatives.
3. **Proportionality and spatial-planning obligations**
   Germany has only five terrestrial natural World Heritage component areas, but more than 25,000 onshore wind turbines. This structural asymmetry creates an obligation to protect irreplaceable WH components. Such areas must be treated as exclusion or restriction zones in regional planning.
4. **High likelihood of development**
   Rügen is a high-wind region. Designating 008n/2024 as a priority area makes actual construction highly probable. Impacts on the World Heritage property therefore have to be assessed at an early stage.
5. **Irreversible ecological impacts**
   Unlike earlier UNESCO cases – cultural sites – focused mainly on visual axes, the potential impacts here concern Criterion IX ecological processes – wind flow, microclimate, sensitive ecosystems, and protected species. These may cause irreversible impacts if the path of the ecological processes is altered.
6. **Incorrect deferral of assessment to later permitting stages**
   The claim that impacts can only be evaluated during the later permitting process (Ref. 5, p. 4174) is not technically valid. Regional planning must determine the fundamental suitability of a site in advance. That's the essence of this planning exercise.

Is the wind power industry a temporary Phenomenon?

Whether wind power will remain a permanent feature of the landscape is a question for future generations. What is already evident, however, is the rapid transformation of existing wind farms through repowering: older 300-kW turbines with 50-m hub heights are being replaced by 4–5 MW machines reaching 150 m, increasing annual output by a factor of twenty — though still producing nothing during periods of no wind.

Jasmund is a high-wind area. Because energy yields increase exponentially with wind speed, a turbine operating at an annual average of 7 m/s could generate roughly twice as much electricity as at an inland site with 5.5 m/s. If priority area 008n/2024 were built next to the Jasmund beech forest World Heritage component, repowering 20–30 years from now would likely involve even larger structures. Once the wind industry has gained a foothold, it becomes increasingly difficult to restore stronger protection simply by letting permits expire.

A comparable dynamic can be observed in the case of Naumburg Cathedral: the turbines visible in Fig. 5 (mostly from 2000–05) did not prevent inscription in 2018, yet several were repowered in 2025 — apparently without a Heritage Impact Assessment. The new installations differ fundamentally in scale, as shown by the permanently sealed crane areas of up to 0.5 ha per tower in Fig. 6. This illustrates what establishing a wind farm in the wider setting of the Jasmund component could entail in the future.

Heritage Impact Assessments (HIAs)

HIAs are still not applied as a routine instrument in Germany, as they cannot be derived directly from national legislation but arise from obligations under the UNESCO Convention.

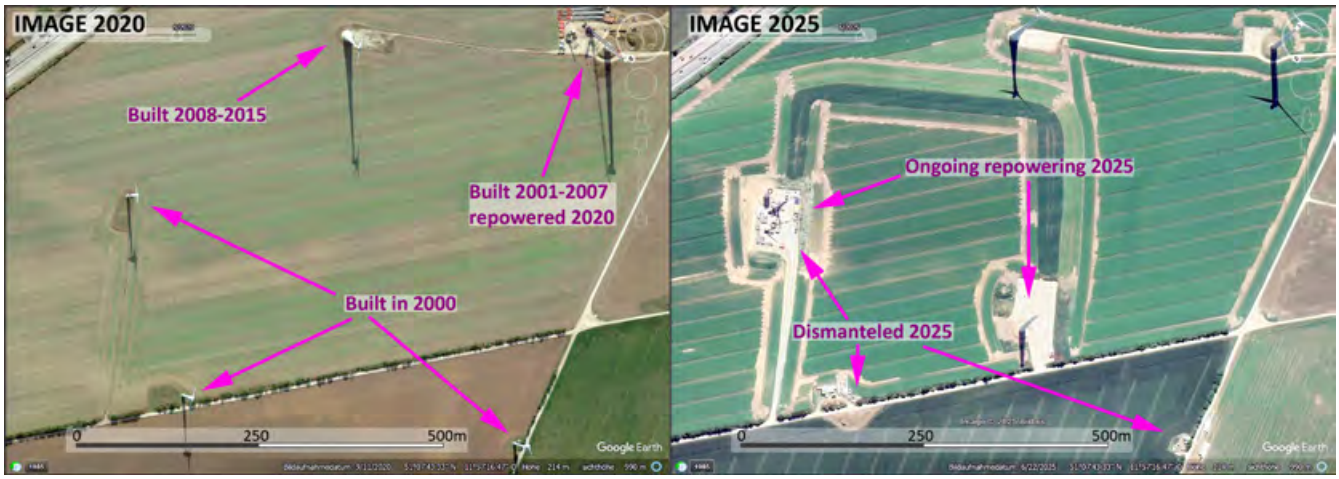


Fig. 6: Wind farm, east of Naumburg. 2020 (left image) and 2025 during repowering (right image) Location: 51°07'45"N 11°57'13"E. Source: Google Earth Pro

In the management plan of Jasmund National Park (NPJMP), no provision requires the use of an HIA; the same omission appears in the overlapping NATURA 2000 management plan. Although the NPJMP refers to reporting duties (p. 14, Vol. 1), it contains no World-Heritage-specific management requirements whatsoever.

This may help explain why no HIA was conducted for the LNG regasification vessel Neptun, which has been moored for several years in the port of Mukran, south of the World Heritage property, and generates considerable noise (Fig. 7).

The brochure "Recommendations on the Compatibility of Wind Energy Expansion and UNESCO World Heritage in Germany" (2019 expert dialogue) highlights a recurring issue: "Actors in the wind energy sector consider cases in which projects fail in areas designated for wind energy to be particularly problematic, as late project cancellations often render years of planning efforts worthless…" (Ref. 2, p. 25). Both heritage protection and project developers therefore benefit from early-stage HIAs, which help identify risks, avoid late conflicts, and ensure that development alternatives are considered from the outset.

Recommendations (addressees in brackets)

a) To ensure that World-Heritage-compliant management requirements, including HIA, are incorporated into existing management plans. (to be fostered by the German Commission for UNESCO)

b) To assess heritage impact of priority area 008n/2024, based on UNESCO standards outlined in "Guidance and Toolkit for Impact Assessments in a World Heritage Context" in the environmental report as part of the current spatial plan revision (by the planning authorities)

c) To notify priority area 008n/2024 to UNESCO WH Centre (by the State Party of Germany)

d) To identify development alternatives for priority area 008n/2024 (by the planning authorities)

e) To treat all five terrestrial natural World Heritage component parts and their wider setting as exclusion or restriction zones in regional planning (by the State Party of Germany)

f) To request the state party to notify UNESCO of the wind farm development, and to conduct appropriate HIAs, according to the Operational Guidelines (UNESCO WH Center)



Fig. 7: LNG Terminal Mukran, 5 km south of the buffer zone of Jasmund WH.
Photo: M. Lenk, 10 May 2026

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Systemic Weakening of Protected Areas Legislation in Russia: A Grave Threat to World Heritage

Eugene Simonov, Rivers without Boundaries International Coalition

Legislation proposing to excise land from the territory of protected areas has been proposed many times, but until recently never reached official parliamentary hearings. Thus, in 2023 by its Decision 45 COM 7B.27 the World Heritage Committee expressed its utmost concern over reports from The Russian Federation of a possible new draft law which would allow the boundaries of federally protected areas to be changed to accommodate economic activities and clearly warned *"that the removal of the legal protection from parts of the property would constitute a clear case for inscription of a property on the List of World Heritage in Danger."*[1]

Nevertheless, on 12 December 2025, the Russian government disclosed a new draft bill, „On Amendments to the Law on Specially Protected Natural Areas (SPNA)," to the State Duma.[2] This legislation, which bypassed previous public disclosure or consultation, marks a watershed moment in the dismantling of legal frameworks for nature conservation in the Russian Federation. Combined with recent amendments already made to the Law on the Protection of Lake Baikal, these proposals signify the most dangerous weakening of environmental safeguards in decades.

Legislative status and political context

Despite significant opposition from scientists and civil society, the bill is moving rapidly through the legislative process. **On 19 March 2026, the State Duma approved the bill in its first hearing.**[3] The vote passed with 288 deputies in favour and 34 against. While the Duma Committee on Ecology formulated 18 specific objections—noting the lack of clear criteria for „national importance" and the impossibility of proving „irreversible loss" of nature—the Ministry of Natural Resources and Environment continues to push the bill forward. The government intends to pass the legislation during the 2026 spring parliamentary session.

Such weakening of conservation legislation reflects perceived need to alleviate impacts of the war and sanctions on economy and reward key supporters of the Putin's regime by opening access to more resources. It also reflects the fact that suppression of civil society during the war greatly facilitated land grabs in valuable natural areas.

Core mechanisms of the new law

The draft bill introduces several legal paths for the seizure of lands inside protected areas (PAs) for defence needs, construction, resource extraction, and provides mechanisms for boundary changes. It specifically aims to „eliminate legal loopholes" that currently prevent the commercial use of protected lands.

1. **Facilities of „National Importance":** The bill proposes to allow the placement of „facilities of national or regional importance" within protected areas in the absence of alternative locations". Crucially, the bill avoids a clear definition of these facilities, stipulating only that they may relate to state security, defence, or projects with „significant impact on socio-economic development". Facilities if "compatible" may be placed inside protected areas lands, and if "incompatible"- the bill provides a procedure for converting lands of PAs into other categories.
2. **Boundary Changes and Land Exclusion:** A new chapter in the Law regulates the exclusion of land and water bodies from SPNAs. Beyond serving projects of national importance, exclusion is also permitted in the event of „irreversible loss of environmental value" resulting from natural disasters. Critics point out that nature has a self-healing capacity (e.g., after fires or floods), and this clause could be used to justify the removal of lands that are simply temporarily degraded but still hold conservation potential. Such clause may incentivise arson as means to exclude burned forest lands from protected areas.
3. **Decision-making Commission:** The placement of these facilities is permitted by Government decision based on recommendations of a „specially created commission." This commission includes representatives from the State Duma, the Federation Council, the Presidential Administration, and the Federal Security Service (FSB). Notably, the bill does not require the inclusion of experts in biological diversity or ecology, raising serious doubts about the objectivity of such a body.
4. **The „Compensation" Levy:** Proponents of projects leading to changes in protected areas must pay into a fund managed by the agencies governing the SPNAs. This creates a perverse incentive where authorities responsible for conservation may favour the exclusion of lands to secure funding for their remaining operations.

Impact on World Heritage Properties

Although the justification note attached to the bill mentions an intention to develop by-laws on special cases of protected areas which a subject to international treaties, it still poses huge threat to all World Heritage properties located in protected areas of Russia, as such bylaws may be developed much later, after several key exclusions are implemented, or not developed at all. Besides, in subsequent communication with Duma Deputies the bill proponents explained that the problem of exclusion of lands from the World Heritage properties can be solved by "timely" notification of the World Heritage Centre, which indicates that intended by-laws, likely, will not provide any additional safeguards. In our view, such legislative amendments appear to be an attempt to legalise already existing dangerous economic development plans in protected areas.

The proposed legislation provides a legal „green light" for numerous controversial commercial projects that have long been stalled by existing conservation laws. Several UNESCO World Heritage properties are directly at risk:

Western Caucasus: The boundaries of this property are under immediate threat from expansion plans for alpine ski resorts (Rosa Khutor, Lagonaki, and Gazprom). Legislative amendments are being sought to authorize hydraulic engineering and roadways within previously strictly protected zones, which will lead to large-scale landscape fragmentation.

Virgin Forests of Komi: For years, persistent attempts have been made to excise the „Chudnoye" gold deposit from the Yugyd Va National Park. This bill would provide the legal mechanism to finally permit gold extraction within the World Heritage site. This has already been openly discussed at roundtables in State Duma during the preparation to the first hearing.

Volcanoes of Kamchatka: In the South Kamchatka Nature Park, 15,000 hectares have already been successfully targeted for excision to facilitate development of the „Three Volcanoes Park" resort, which includes a seaport, roadways, and luxury hotels.

Central Sikhote-Alin: Development of the „Glukhoe" gold deposit is planned within the buffer zone of the Sikhote-Alin State Nature Reserve. This threatens to pollute spawning rivers and disrupt critical migration corridors for the Amur tiger. After passing of the new Law, the company may further encroach inside the territory of the World Heritage property by excluding certain areas from the Sikhote-Alin Nature Reserve.

Curonian Spit: This transboundary property faces a project for an artificial peninsula and a hotel complex up to 21 meters high as well as filling of a coastal lagune to develop marina and port. This poses a threat of mass avian mortality for migratory birds due to light pollution and glass facades as well as full transformation of natural coastal habitats and important fish spawning grounds.

The „Amendments to the Law on Specially Protected Natural Areas" represent a systemic crisis for nature conservation in Russia. Instead of expanding the SPNA network to meet international biodiversity targets, the Russian Federation is institutionalizing the excision of lands for short-term economic interests.

Although the conservation community actively opposed the law[4] and had some tactical success, there is no doubt that the law will be passed and lead to major losses in protected areas system. If fully adopted, this law will interpret nature conservation not as a national priority, but as an impediment to development, potentially leading to the „In Danger" listing of multiple Russian World Heritage properties.

Notes

1 Decision 45 COM 7B.27 the World Heritage Committee (2023) https://whc.unesco.org/en/decisions/8301

2 Draft Bill No. 1096223-8 'On Amendments to the Law on Specially Protected Natural Areas' (2025). https://sozd.duma.gov.ru/bill/1096223-8

3 RBC News, "Duma approved the bill on changes to the boundaries of nature reserves," 19 March 2026. https://www.rbc.ru/politics/18/03/2026/69ba85f39a79477b0bed6a62

4 Letter from Rivers without Boundaries to the UNESCO World Heritage Centre, Ref. RwB-20260212, 12 February 2026.



Fig. 1: Mining Village at the "Chudnoye" Gold deposit inside Yugyd Va National Park. August 2019.
Source: Greenpeace International

Western Caucasus World Heritage Site: A Review of 2025 Developments

Anonymous authors

The whole range of problems that have existed in recent years continues to be relevant for the Western Caucasus:

- Proposed roads through the Caucasus Nature Reserve
- Ongoing development of resorts in the Sochi National Park
- Construction of a mountain resort on the Lagonaki Plateau
- Construction of the Lagonaki-Guzeripl motorway
- Increased anthropogenic pressure on the River Tsitsa Headwaters and Mountain Adygeya Nature Parks following the change in their status as protected areas (transfer from nature monuments to nature parks) in connection with the construction of a water pipeline, a road and the development of tourism.
- Uncertainty regarding the boundaries of the Bolshoy Thach Nature Park and systematic damage to natural complexes caused by illegal off-road vehicle traffic.
- Lack of real control over nature parks in Adygea, despite the creation of administration offices for each site.
- Lack of a buffer zone for the Caucasus Nature Reserve.

Construction of a resort on the Lagonaki Plateau

In 2025, work continued actively on the construction of infrastructure for the resort. In April, the head of Adygea reported to the Ministry of Construction of the Russian Federation that the section of the Dakhovskaya – Lagonaki Plateau motorway had been put into operation, and construction and installation work was continuing on water supply and drainage systems, connection to power grids and gas supply.[1]

From April to October 2025, drilling work was carried out on the Lagonaki Plateau using heavy construction equipment. The Ministry of Internal Affairs and the prosecutor's office established that damage had been caused to natural complexes: the soil and vegetation cover had been significantly disturbed, and dozens of plants listed in the Red Book of Adygea (*Dactylorhiza euxina, Fritillaria ophioglossifolia, Gentiana dshimilensis, Gentiana septemfida*) had been destroyed.







Fig. 1–3: Drilling work on the Lagonaki Plateau. *Photos by the authors*

The Upper Village hotel complex project received a positive conclusion from the Main State Expert Review Board of the Russian Federation for construction.[2] After that, the investor announced a tender for the felling of 9,950 trees, the filling of karst sinkholes, the laying of temporary roads and the preparation of the site for construction. The work was planned to be carried out by the end of 2025.

However, in the summer of 2025, the Prosecutor's Office of the Republic of Adygea applied to the Arbitration Court of the Republic of Adygea with a statement recognizing the positive conclusion of the State Expert Review of the project documentation for the 'Upper Village' as illegal, and blocked all preparatory work (tree felling, road construction, etc.).[3] The prosecutor's office believes that the conclusion was issued in violation of environmental requirements, which could lead to harm to the environment. In addition, based on the materials of the prosecutor's investigation, a criminal case has been initiated on the fact of the manufacture and use of forged documents on the results of engineering-geological and environmental surveys.[4]



Fig. 4: Construction of the Lagonaki-Guzeripol motorway. *Photo by the authors*

Activists continue to defend the reserve and surrounding areas. In early 2026, the Social and Environmental Union, a non-governmental organization, with the support of the prosecutor's office, filed a lawsuit with the Supreme Court of Adygea regarding the inadmissibility of building a hotel complex in the buffer zone of the reserve, and for the preservation of the forest in this area.[5] Ecologist Valery Brinich sued first in the Supreme Court of the Russian Federation,[6] and then in the Appeals Chamber of the Supreme Court of the Russian Federation,[7] for the overturn of the government's decision to create a biosphere reserve on the Lagonaki Plateau. The next stage of the appeal is expected in 2026.

The World Heritage Committee has repeatedly pointed out the inadmissibility of large-scale tourist infrastructure construction on the Lagonaki Plateau, including in its latest decision 47 COM 7B.30. Furthermore, despite the requirements of the 2024 Reactive Monitoring Mission and Committee Decision 47 COM 7B.30, construction of the Lagonaki-Guzeripol motorway continued in 2025.[8]

Construction of tourist infrastructure in Sochi NP and Sochi State WR on areas adjacent to the world heritage site

The development of the Turiev Khutor resort on the border with the heritage site continues. In August 2025, documents from the state environmental review of the first phase of construction, including EIA materials, were posted for public discussion.[9] According to the EIA materials, plants listed in the Red Book of the Russian Federation have been found within the design area, including *Ruscus colchicus* (205 specimens) and *Cyclamen coum* (8 specimens). Also, according to the EIA materials, of the 12 species of amphibians and 27 species of reptiles inhabiting the Krasnodar Territory, four species of amphibians and four species of reptiles were found in the Krasnopolyansky district forestry of the Sochi National Park. Of these, the *Pelodytes caucasicus* and the *Bufo verrucosissimus* are listed in the Red Book of the Russian Federation. Fifteen individuals of these species have been recorded in the planned construction area. In addition, insects listed in the Red Book of the Russian Feder-

ation (*Xylosteus caucasicola, Rosalia alpina, Xylocopa valga, Carabus biebersteini constantinovi*) have been found in the planned construction area.

The construction will have an irreversible impact on the flora and fauna, resulting in a reduction in suitable habitat and creating a permanent source of disturbance and fragmentation of the territory.

In September 2025, it became known that the Sochi Administration had cancelled the decree approving the territory's development plan[10]. The basis for the decision was a protest by the Sochi Prosecutor's Office, which was reportedly filed on 2 October 2024.

However, according to media reports, the investor company has no intention to abandon its plans to build the Turiev Khutor resort.[11] Investors are waiting for changes to be made to the regulations on the Sochi National Park and the recreational activities plan. The company believes that the updated documents will allow the project to go ahead.

The Joint WHC/IUCN Reactive Monitoring Mission (September 2024) recommended that a master plan and EIA for any resort planned in the vicinity of the site be submitted to the Committee, and reiterated that tourism activities should only be carried out where their environmental impact can be proven to be low.[12]

Notes

1 https://mayak-01mr.ru/ news/obshchestvo/glava-adygei-rasskazal-v-minstroe-rossii-o-perspektivah-razvitiya-ekokurorta-lagonaki

2 https://kuban.rbc.ru/krasnodar/freenews/6835b8489a79470f1c77bbc9

3 https://kad.arbitr.ru/Card/f1d60830-88c4-4438-aee9-079c6ef6186c

4 https://vk.com/wall24179738_12871

5 https://vs--adg.sudrf.ru/modules.php?name=sud_delo&srv_num=1&name_op=case&case_id=5749604&case_uid=43235ec5-776b-417d-8572-f4d109af30d9&delo_id=41

6 https://utyug.info/new/verkhovnyy-sud-otkazal-v-udovletvorenii-iska-ob-upravdnenii-lagonakskogo-poligona-59474/

7 https://www.kommersant.ru/doc/7890618

8 https://kuban.rbc.ru/krasnodar/freenews/682b10e99a794758680f0a3b

9 https://sochi.ru/zhizn-goroda/ekologiya/obshchestvennye-obsuzhdeniya/285126/

10 https://kuban.rbc.ru/krasnodar/freenews/68b80d0f9a79474d4e3c15ba

11 https://expertsouth.ru/news/interros-ne-sobiraetsya-otkazyvatsya-ot-planov-po-stroitelstvu-kurorta-turev-khutor/

12 https://whc.unesco.org/document/220829

A Crisis is Unfolding at Lake Baikal

Eugene Simonov, Rivers without Boundaries International Coalition

By early 2026 the specific system of governance developed to preserve the Lake Baikal World Heritage property has completely deteriorated. The Governmental Commission on Lake Baikal has been fully inactive since October 2024, while the Baikal-specific National Project was merged into the general national project "Environmental Well-Being" with substantial budget cuts. The amended Baikal Law prescribes the creation of another "Commission for the Protection of Lake Baikal and the Socioeconomic Development of the Baikal Natural Territory" with the sole function to approve land-clearing for development and "sanitation clear-cutting". Major land grabbing and construction activities are now triggered as the new law came into force on March 1, 2026.

Systemic weakening of Lake Baikal legislation

The "Law on Protection of Lake Baikal" has been amended by the Russian State Duma on December 9, 2025 (the Law No. 94-FZ). This action has been taken in direct violation of the 2025 **Decision 47 COM 7B.26** of the World Heritage Committee which urges the State Party to "*assess the impact of any proposed legislative changes on the property and its OUV and submit these proposals to the World Heritage Centre for review by IUCN prior to their approval, as well as to avoid any legislative changes that may result in adverse impacts*". The main destructive changes allow large-scale development:

In the territory of the World Heritage property the bill removes the prohibition of forest clearcutting on land plots located not in the forest fund land and outside of protected areas, e.g. it allows unlimited land clearing in the Special Economic Zones, agricultural areas and on municipal lands. This will greatly facilitate the development of present natural habitats, as the prohibition of removing (clear-cut) woody vegetation has been a significant impediment to new construction on those lands.

1. The bill removes the prohibition of clearcutting, in particular, for "sanitary forest cutting", on "forest fund land" throughout the property. "Sanitary forest cutting" has been used in Siberia to conduct logging in areas where it is otherwise restricted. Besides opening forests to commercial logging, this measure also greatly increases fire hazards and establishes a preference for plantation sylviculture in areas where natural forest regeneration is usually possible.
2. The third dangerous effect of the bill is allowing the conversion of lands from the forest fund into categories other than protected areas, and opening them for development of various broadly-defined types of "infrastructure": roads, grids, hydro-engineering structures, etc. This clause means that at least until 2031 any part of the World Heritage property can be fragmented by "necessary" infrastructure, without coherent comprehensive planning, practically on an ad-hoc basis.
3. The fourth class of harmful changes relate to expanding the municipal lands to their maximum extent, including wholesale grandfathering of all landgrabs of the past. This makes those new lands open to development of new buildings, as the prohibition of forest clear-cutting has been removed. In addition to the development of several thousand hectares of present natural and semi-natural habitats, this measure may also greatly exacerbate the pollution of the lake which presently comes from sub-standard or absent waste-treatment facilities.

The new legislation has only one minor positive change: it clarifies the presence of a "water protection zone" withing the "Central Ecological Zone of the Baikal Natural Territory", removing some concerns regarding possible future attempts to reduce the area of the World Heritage property. Beyond that the bill does not include any attempts to improve and strengthen any aspect of the protection of Lake Baikal, which makes it illegitimate both in terms of the "Law on Protection of Lake Baikal" itself and the spirit and guidelines of the Convention.

Immediately after adoption of the Law, the Chair of the State Duma Mr. Volodin publicly urged to start a witch hunt for "those who received foreign funding to work on Lake Baikal" targeting the remaining activists, NGOs and independent journalists.

Rapid development of Special Economic Zones (SEZ)

In 2025 the Irkutsk and Buryatia regions received 2.5 million tourists, mainly travelling to Lake Baikal, and those numbers are expected to double by 2036.[1] Lake Baikal is the key element of the massive program for domestic tourism development "Five Seas and Lake Baikal", and Law No. 94-FZ was issued to facilitate the rapid expansion of tourist facilities construction as the

law finally enables to clear forested plots in Special Economic Zones (SEZ) for the construction of tourist facilities.

Local activists visited "SEZ in Buryatia and found that the previously untouched "Bezymiannaya Bay" lakeshore (almost 400 ha property bought by "COSMOS" hoteliers) is now fully fenced, which signifies the beginning of land clearing for a 5-star resort that, according to ESIA, includes two hotels, 30 bungalows, housing for staff, restaurants, cafes, service buildings and more than 10 kilometres of paved roads.



Fig. 1: Fence at Bezymiannaya Bay – part of the "Baikal Harbour" SEZ owned by "COSMOS Hotel Baikal." Photo source: https://t.me/alikinalubov/11310

Three other projects are being actively built in the "Baikal Harbour" SEZ. One of those, "AMAR" has already opened a restaurant whose wastewater system was leaking onto the lakeshore in February 2026.[2] According to media reports, this restaurant also advertises dishes with "red book plant" ingredients.[3]

Law No. 94-FZ introduced only one new limitation: it prohibits the development of new SEZ. Therefore, two days before it came into effect, on 27 February, 2026, the Government of Russia issued a decree for the establishment of a new SEZ "Baikal Lakeshore" next to the "Gates of Baikal" SEZ in Irkutsk Province[4] on the industrial site of the Baikalsk Pulp and Paper Mill according to a design developed by the VEB.RF Development Corporation.[5]

This plan was widely promoted in 2022-2025, and its name on the VEB.RF website is "Baikal Lakeshore" – Resort for all Seasons.[6] The development, covering 250 hectares, includes housing, recreational facilities, four hotels, museums, etc. Half of the intended buildings are planned not at the industrial site per se but in surrounding forests and wetlands along the lakeshore and the Solzan River. The amended Baikal Law will allow developers to clear those forests as needed for housing facilities and hotels. The scheme for wastewater treatment for the new SEZ is not clear.



Fig. 2a: A map with old (green) and new (red) Special Economic Zones (SEZ). Source: https://проект.бцбк.рф/#goals (VEB.RF website)



Fig. 2b: Satellite imagery of the Baikal Pulp and Paper Mill industrial site in Baikalsk, location of the first stage of the "Baikal Lakeshore" SEZ development. Source: Google maps



Fig. 2c: Plan of the 1st phase of the new SEZ development. Source: https://проект.бцбк.рф/#goals (VEB.RF website)

Remediation of the BPPM industrial site

Russia's 2026 SoC Report talks primarily about specialized technological infrastructure for the treatment of alkaline wastewater with 12 purification stages and enabling the achievement of the regulatory indicators. The SoC does not say where the resulting wastewater is going to be disposed, but mentioning of the Lake Baikal makes us believe that the intention is to pour it into the lake, which is illegal. Neither is there any explanation whether this affluent will be collected and processed in perpetuity or this process has some completion date. The question is a crucial one, since all toxic sludge generating this effluent is likely to remain on site.

Then the Report says that "(buildings) dismantling work will also include waste sorting, safe storage, or disposal in accordance with environmental standards", but it does not explain where this enormous amount of demolition waste going to be stored and disposed. The plan described in the Report guarantee final remediation of all negative impacts from the Baikal Pulp and Paper Mill site by 2027.

Water level regulation in the interest of hydropower

Referring to the 2025 "temporary regulation" (allowing a more than 2-m range for lake level fluctuation), Russia clearly refuted the Committee's repeated request that it *"should not allow the water level variation to exceed 1 metre, as this may have a negative impact on the Property and its Outstanding Universal Value, until IUCN reviews the legislative proposals and management regulations and determines the Property protection requirements"*. This is another worrying sign of deterioration of the governance system for the protection of the Lake.

To the best of our understanding, Russia also did not provide UNESCO/IUCN with legislative proposals and draft management regulations on water level fluctuation, but only with results of academic study on the subject. As reported in our previous papers, the widening of "normal" range of fluctuation to 1.42 meters suggested by that study will have a deep detrimental impact on the Lake Baikal World Heritage property, especially when high levels coincide with the winter storm season. Such changes have been long proposed by the En+ Group – the owner of Irkutsk Hydropower Plant that uses Lake Baikal as its reservoir.

The Russian SoC Report itself presents solid evidence from the Barguzinsky State Nature Biosphere Reserve / Zabaykalsky National Park (Federal State Budgetary Institution "Zapovednoye Podlemorye"): "*The water level of Lake Baikal has relatively stabilized over the past three years, while strong autumn storms continue to erode certain sections of the coastline of Barguzinsky Bay in the Zabaykalsky National Park and the Barguzinsky Nature Reserve. For example, in the fall of 2025, a strong storm recorded significant erosion of a section of the coastline of the Barguzinsky Nature Reserve in Sosnovka Bay, eroding up to 2-3 meters along the shoreline, and killing individual trees*."

This visible damage to coastal forests was caused in the year when the highest level of the lake reached only 456.92 masl which was still 8 cm lower than highest limit prescribed by the 2001 Governmental Decree that limited fluctuations to a 1 m range. If even such water level can be associated with serious physical impacts during storms, that shows the immense danger in case of raising this level further. Therefore, a proposal to allow to bring the water level up to 457.25 masl in a "business as usual" operation of Irkutsk Hydropower Dam puts at extreme risk the shallow water and coastal ecosystems all around the lake, as the dam operators will be allowed to enact such a fluctuation without any justification or permission.

Revival of mining

In 2025, in the Republic of Buryatia, Apatit Agro LLC, in collaboration with the Russian Copper Company (RCC), has presented plans for the development of the Oshurkovskoye apatite deposit. The project has a targeted annual production capacity of 14 million tons of apatite ore. The deposit is situated directly on the banks of the Selenga River, 10 km downstream of the regional capital, Ulan-Ude, and 30 km upstream from the Lake Baikal World Heritage property. According to the protocol of a meeting of the Lake Baikal Council at the Siberian Branch of the Russian Academy of Sciences, on 7 November 2025[7], the main threat from the mining project is a massive influx of phosphorus into the Selenge river and Lake Baikal, which will lead to further eutrophication of coastal waters. Nevertheless, on April 14, 2026, the State Environmental Expert Review Panel issued a positive conclusion on the project 'Exploration of apatite ores and associated minerals and pilot-scale mining at the Oshurkovskoye deposit, Ivolginsky District, Republic of Buryatia'.[8]

The obvious deterioration of the governance system created to protect Lake Baikal's OUV, and the increasingly dangerous development on the lakeshore may necessitate inscribing Lake Baikal on the List of World Heritage in Danger, which will likely be proposed as a result of the Reactive Monitoring Mission to the property in the summer of 2026.

Notes

1 https://1baikal.ru/novosti/razdelit-turpotok-na-baykale-predlozhili-uchastniki-konferentsii-po-ustoychivomu-razvitiyu

2 https://nia.eco/2026/02/25/111855/

3 https://1baikal.ru/novosti/otel-na-baykale-vosstanovil-krasnoknizhnoe-rastenie

4 Russian Government Decree N 198 issued on 27.02.2026 "Creation of Special Economic Zone of Tourist-recreational type "Baikal Shore" on the territory of Slyudiansky District " https://www.consultant.ru/document/cons_doc_LAW_527817/

5 https://irkobl.ru/news/4335464/

6 https://%D0%BF%D1%80%D0%BE%D0%B5%D0%BA%D1%82.%D0%B1%D1%86%D0%B1%D0%BA.%D1%80%D1%84/

7 https://www.sbras.ru/files/files/protokol_2026-03-12.pdf

8 https://rpn.gov.ru/activity/gee-registry/e293e4a5-9ee0-4b4c-ace3-abf13929a9a2/

Geological exploration work near the Central Sikhote-Alin World Heritage Site

Anonymous authors[1]

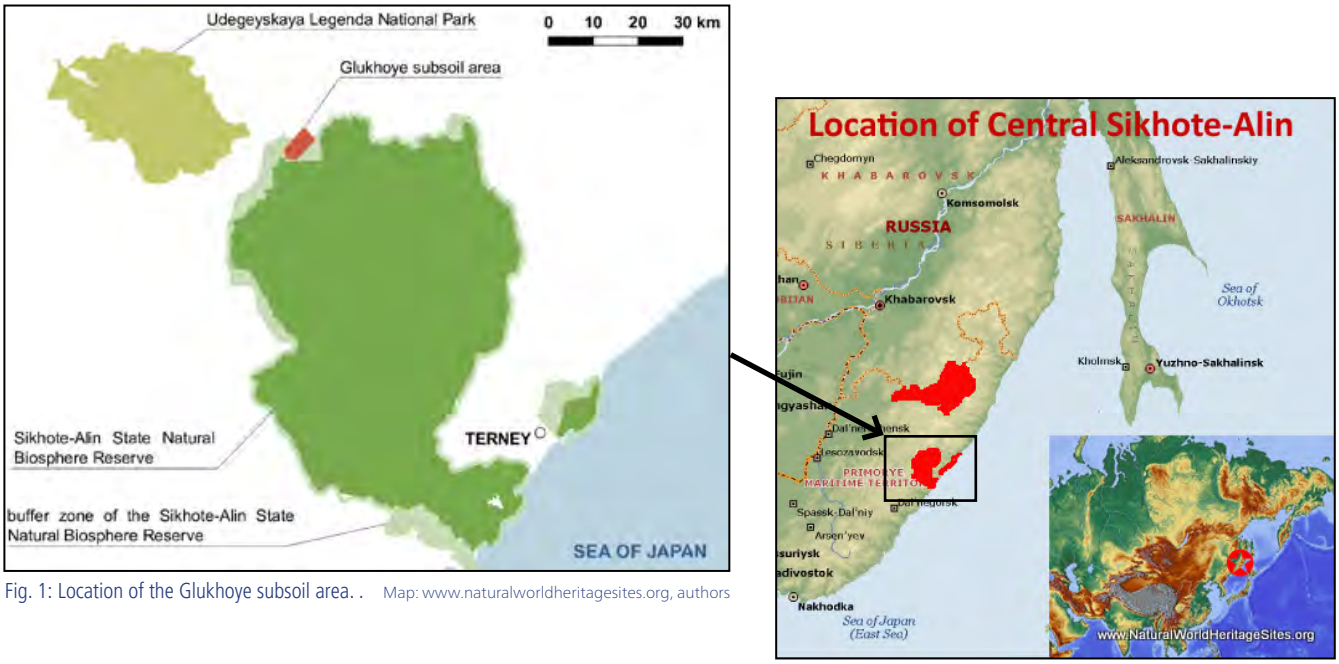


Fig. 1: Location of the Glukhoye subsoil area. . Map: www.naturalworldheritagesites.org, authors

There are new developments concerning the geological exploration work in the buffer zone of the Sikhote-Alin Reserve.

The Glukhoye subsoil area is located within the boundaries of the Sikhote-Alin Nature Reserve's buffer zone. In 2022, Vostok Invest LLC (now renamed Zolotorudnaya Kompaniya Glukhoye LLC) obtained licence No. VLV 006112 BP for geological exploration of the ore gold deposit. The site is located only 100-150 metres from the reserve's border. Geological work began in the summer of 2025. It has already caused damage to the area: the landscape has been altered, the soil and vegetation layer has been removed over a significant area, roads have been laid, and heavy equipment is being used to drill wells.

Following appeals from environmental organisations, in October 2025 the Vladivostok Interdistrict Environmental Prosecutor's Office conducted an on-site inspection and confirmed violations in the activities of the subsoil user (lack of a forest development project, destruction of viable undergrowth and fertile soil layer). However, the work has not been stopped. The Russian Ministry of Natural Resources officially refused to suspend



Fig. 2: Exploration trench (September 2025). Photo by the authors

or restrict geological exploration work, even though Russian law provides for such a possibility.

At the beginning of 2026, plans were announced to continue the company's work, including the construction of a quarry and a gold extraction plant.

1 The authors are known to, and can be contacted through, WHW.



Fig. 3: Removed soil and vegetation cover (September 2025). Photo by the authors

The subsoil plot is located in the catchment basin of small rivers (the Groznaya River and the Buiny Stream), which flow into the Kolumbe River, one of the main waterways of the reserve. In such a situation, it is almost inevitable that soil and other pollutants will enter water bodies, which could harm the reserve's natural complexes.

This area is also an ecological corridor between two protected areas — the Sikhote-Alin State Reserve and the Udegeyskaya Legenda National Park. Both areas are important habitats for the Amur tiger. Geological exploration and the associated deforestation, road construction, constant noise pollution and human presence may disrupt the functioning of the corridor and, as a result, worsen the living conditions of the Amur tiger.

According to §180 of the Operational Guidelines for the World Heritage Convention, the criteria for inscription of a property on the List of World Heritage in Danger are:

a) ascertained danger: Human encroachment on boundaries or in upstream areas which threaten the integrity of the property.

b) potential danger: Planned resettlement or development projects within the property or so situated that the impacts threaten the property.

Thus, prospecting, exploration, or ore mining at the Glukhoe subsoil plot in the buffer zone of the Sikhote-Alin Nature Reserve may be the basis for considering the inscription of the property on the List of World Heritage in Danger. We consider that these works threaten the OUV of the World Heritage property and should be reflected in the decision of the World Heritage Committee.

Kamchatka: Infrastructure Failures Demonstrate the "Three Volcanoes" Tourism Threat

Eugene Simonov, Rivers without Boundaries International Coalition

The Volcanoes of Kamchatka, a serial World Heritage property inscribed in 1996, represents one of the most outstanding volcanic regions on Earth. However, the 2025 IUCN Conservation Outlook Assessment has rated the site's status as a "Significant Concern." This rating is driven by the escalating threat of large-scale infrastructure development, specifically the "Three Volcanoes Park" project, coupled with persistent management failures and a lack of transparency regarding land-use changes. As of early 2026, the situation has reached a critical point, exemplified by high-profile infrastructure failures and the continued exclusion of vital territories from protected status to facilitate commercial interests.

The "Three Volcanoes Park" Project: Massive investment and irresponsible execution

The "Three Volcanoes Park" is a flagship tourism cluster designed to transform Kamchatka into a premier "eco-tourism" destination. Supported by a massive budget of approximately 67 billion rubles, the project is backed by a powerful syndicate of state development corporations (VEB.RF) and private investors, including Interros and Vasta Discovery. Despite its branding as a sustainable initiative, the project's execution has been marred by allegations of negligence and financial mismanagement.

In March 2026, a newly constructed bridge over the Karymshina River, a key component of the project's road infrastructure leading toward the Vilyuchinsky volcano, collapsed before its official completion. This incident sparked a federal investigation by Russia's Investigative Committee and the Prosecutor's Office. Eyewitness reports and preliminary probes suggest severe technological breaches and dubious expenditure of budget funds. This collapse serves as a stark illustration of the perils of building heavy infrastructure in untouched, geologically unstable wilderness. It further highlights a systemic lack of construction oversight and an irresponsible use of state resources that threatens the very ecosystems the project claims to showcase.

The land grab and territorial discrepancies

A central point of contention remains the status of land plots within the World Heritage site. In 2020, the regional government excluded approximately 15,000 hectares from the Yuzhno-Kamchatsky Nature Park, specifically around Vilyuchinskaya and Zhirovaya Bays. Despite repeated requests from the World Heritage Committee (in 2021, 2023, and 2024) to restore the protected status of these areas, the regional government has remained hesitant.





Fig.s 1 and 2: Bridge over the Karymshina River under construction (above) and after collapse (below). Sources: Developer's website and social media

There is a significant discrepancy between the State Party's official reports and the project's actual plans. While the State Party has claimed that the "Three Volcanoes Park" is planned to be implemented at a "significant distance" from the Property (spe-

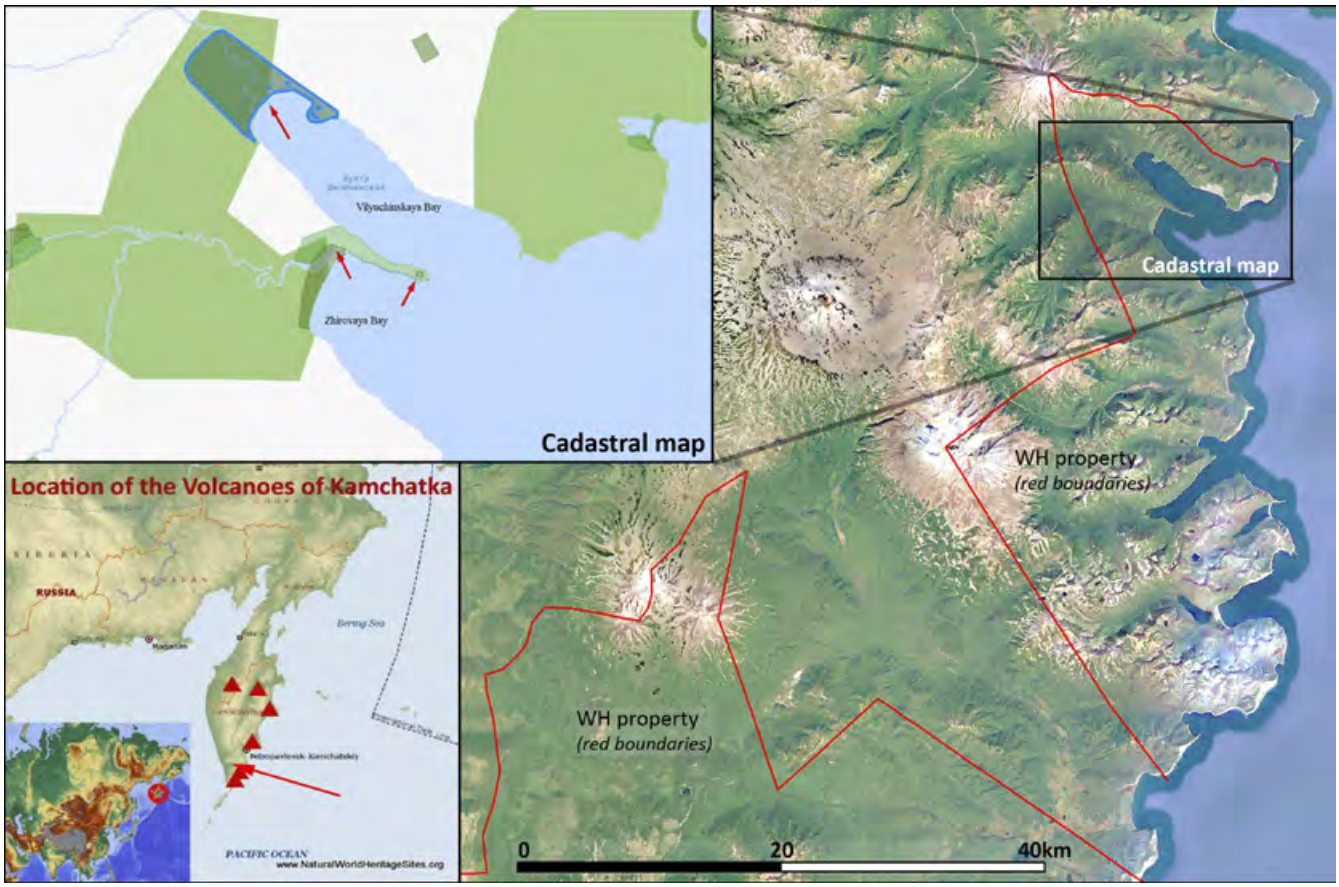


Fig. 3: Screenshot from the Public Cadastral Map (upper left) and its location within the World Heritage property (main map). The arrows in the cadastral map indicate land plots designated for recreational activities. Maps: Cadastral map from the public cadaster, WH property: Google Earth / Martin Lenk, Overview: www.naturalworldheritagesites.org

cifically in the Paratunka River valley), the project's own official materials contradict this. Diagrams on the project's website and public cadastral maps from 2021 and 2023 show land plots allocated for recreational facilities and a maritime passenger terminal directly within the Vilyuchinskaya Bay, which is part of the World Heritage property. Furthermore, in early 2024, the head of the region confirmed plans for a new sea terminal and checkpoint in Vilyuchinskaya Bay, alongside 100 km of asphalt roads and hotel complexes. The failure to return these "grabbed" lands to the Nature Park suggests that, despite reports from the newspaper Vedomosti in February 2026 that investors might scale back the project due to economic headwinds, the government intends to maintain commercial control over these sensitive coastal areas.

Weakening protection and deficient management

The proposed solution by the State Party — to include the excluded territories in a new "Volcanoes of Kamchatka National Park" as its buffer zone — is viewed with skepticism by the scientific and environmental community. Current Russian legislation regarding buffer zones is often too weak to ensure the integrity of a World Heritage site. For instance, the regime established for the Caucasus Reserve in late 2025 permits the construction of "capital structures," including linear infrastructure for tourism, within the buffer zone. There is a justified fear that a similar regime will be applied in Kamchatka, essentially legalizing the "Three Volcanoes" infrastructure within what should be a protected area.

Furthermore, the site continues to lack an overall management plan and a Master Plan for Tourism Development. While the planned upgrading of regional nature parks to a federal National Park is a positive step in terms of funding and staff capacity, it does not solve the immediate threat of the areas already excluded from the South Kamchatka Nature Park.

These areas currently possess no special protection status, leaving them vulnerable to the "Three Volcanoes" project, which remains unaddressed in the State of Conservation reports.

Furthermore, the State of Conservation Report does not contain information on plans for the development of the mining industry near the World Heritage site. Meanwhile, the 2025 World Heritage Outlook points to recently intensified development of gold mining and ore processing at several locations adjacent to the property, and argues that unchecked expansion of mining led in the past to exclusion of lands from the protected areas that comprise the property.

Conclusion and recommendations

The current trajectory of development in Kamchatka poses an imminent threat to the integrity of the World Heritage site. We propose that the World Heritage Committee take the following actions:

1. Demand that the State Party immediately restore the protected status of the 15,000 hectares excluded from the Yuzhno-Kamchatsky Nature Park and cancel all plans for the construction of a maritime terminal in Vilyuchinskaya Bay.
2. Request a full, independent Environmental Impact Assessment (EIA) for the "Three Volcanoes Park" project, conducted in strict accordance with the IUCN Guidance and Toolkit for Impact Assessments in a World Heritage Context, before any further construction proceeds.
3. Request detailed information on planned mining activities near the boundaries of the Property, which have been omitted from recent State reports.

Without these measures, the OUV of Volcanoes of Kamchatka risk being permanently eroded by a project that prioritizes short-term economic gain over global conservation obligations.

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Western Tien-Shan: Compromised Decisions and Persistent Threats

Eugene Simonov, Rivers without Boundaries

The Western Tien Shan (WTS), a transnational serial World Heritage property inscribed in 2016 under criterion (x) for its exceptional biodiversity, endemism, and role as a centre of origin for cultivated fruit crops, continues to face severe threats from hydropower development, mining, tourism infrastructure, and boundary integrity issues. Shared by Kazakhstan, Kyrgyzstan, and Uzbekistan, the property's Outstanding Universal Value (OUV) depends on intact river valleys, forests, and critical habitats for rare species of plants, fish, birds and mammals. Developments in 2025 – early 2026 demonstrate weak implementation of World Heritage Committee decisions, politicisation of processes, and continued pressure on the property's most sensitive ecosystems.

Politicisation of the 2025 World Heritage Committee Decision

The 47th session of the World Heritage Committee (Decision 47 COM 7B.8) adopted a compromised text following interventions by the State Party of Kazakhstan, then a Committee member. While the decision noted progress in transnational coordination (including the 2024–2028 Regional Management Plan), it fell short of robust protective measures and suggested "mitigation" of impacts of planned hydropower cascades, which, according to previous decisions, should not be planned on key rivers of World Heritage sites. The intervention by Kazakhstan softened language on the Ugam River hydropower cascade, prioritising national development interests over strict OUV protection.

Nevertheless, the Committee still requested revisions to the proposed boundary clarifications, enhanced monitoring, impact assessments for development projects (notably the Kaskasu Ski Resort and Ugam Hydro project in Kazakhstan), inventorying all planned and existing dams on rivers crossing the property and permanent cancellation of gold mining licences in Kyrgyzstan's Besh-Aral State Nature Reserve.

Following adoption of the diluted text, Rivers without Boundaries (RwB) international coordinator Eugene Simonov addressed the Committee, warning that the decision may pave the way for devastation of the Western Tien-Shan. This highlights broader concerns about politicisation within the Committee and inconsistent adherence to the Convention's rules, previous decisions on dams, and the Guidance and Toolkit for Impact Assessments in a World Heritage Context.



Fig. 1: RwB International Coordinator addressing the World Heritage Committee Session. July 2025 Photo: Rivers without Boundaries

2025 Conservation Outlook: Significant concern

The 2025 IUCN Conservation Outlook Assessment rated the property's outlook as of "Significant Concern". It emphasised a fundamental question mark over whether the site's current configuration adequately represents its OUV. The Committee's long-standing request for boundary rationalisation to follow ecological principles, ensure connectivity, and fully correspond to criterion (x) remains largely unaddressed. While individual component management appears adequate, transboundary coordination is insufficient, and growing threats from hydropower, tourism, mining, and climate change loom large. Resources for management of the serial transnational property remain limited.

The Outlook specifically flags risks to rivers and landscapes that underpin the property's biodiversity values, including 20 species of native/endemic fish not even inventoried at the time of inscription.

Growing boundary concerns

The 2025 joint State of Conservation report from the three States Parties which suggested approaches to boundary clarification was not made publicly available. Experts anticipate attempts — particularly by Kazakhstan and possibly Kyrgyzstan — to pursue Significant Boundary Modifications that could excise valuable river valleys to facilitate hydropower and tourism infrastructure. RwB previously reported that Kazakhstan's proposals would subject the Sairam-Ugam State National Park to severe fragmentation. Kyrgyzstan issued at least three gold mining licences overlapping with various parts of the WTS World Heritage Site. Uzbekistan confirmed no changes to the Bashkizilsay component following transfer of its management to State Railroad Company, but overall transparency remains low, while surrounding Ugam-Chatkal National Park is being rapidly fragmented by large hydropower and tourist resort development, decreasing connectivity between different components of the WTS property. Pending verification of boundaries and OUV representation, assessments of the property's long-term conservation prospects remain premature.

Kazakhstan's continued push for the Ugam Hydropower Cascade

Despite Committee requests and submission of a Heritage Impact Assessment (HIA) in September 2024, Kazakhstan is advancing the Ugam River water infrastructure project. In January 2026, the Minister of Water Resources and Irrigation, Nurzhan Nurzhigitov, confirmed the ongoing development of project documentation for a water diversion pipeline with a cascade of five hydropower plants (total ~72 MW capacity, cost ~191.7 billion tenge / ~380 million USD). The project aims to supply 110 million m^3 of drinking water annually to districts in the Turkestan Region while generating power.

This contradicts expectations of downscaling or minimising impacts as per Committee recommendations (e.g., prioritising domestic water collection over hydro-generation). The project lies within or directly affects the Sairam-Ugam component of the World Heritage property. No evidence suggests the HIA has meaningfully altered water infrastructure development plans. Kazakhstan's dual role as Committee member and project proponent raises clear conflict-of-interest issues.

Positive steps and lingering mining issues in Kyrgyzstan

A rare positive development occurred in November 2025 when the Cabinet of Ministers of Kyrgyzstan by Decree No. 742 annulled two earlier decisions of 2023 that had transferred lands in the Besh-Aral State Nature Reserve from protected status to industrial use for road construction and placer gold mining. The decree, prompted by a General Prosecutor's appeal, mandates land restitution, ecosystem rehabilitation, and restoration of protected status.

However, implementation lags. As of May 2026, only the Arab placer gold deposit licence appears fully revoked according to the National Registry of Mining Licences. Mining at the Naiza-Tugay deposit on the Chatkal River — inside the World Heritage component — continued post-Committee decision. Sentinel satellite imagery have shown an expansion by ~1 km downstream between July and October 2025, with over 1.3 km^2 of degraded floodplain, river diversion, and filling of artificial ponds. Mining camps and earthworks persist, indicating either non-revocation of licences or illegal operations. Continued mining operations also include regular disturbance from the road illegally built along the Chatkal river. Rehabilitation has not been observed at scale, and plans for it have not been publicly discussed any further.



Fig. 2: Satellite view of the placer gold mining operations inside Besh-Aral Nature Reserve as of May 5, 2025.
Source: Copernicus Sentinel Satellite Imagery https://tinyurl.com/mt4m2xsr

Chatkal river hydropower developments: Uncertainty and new upstream cascade

The status of the larger 251 MW Chatkal HPP once planned inside Besh-Aral remains unclear since mid-2025, with no new public information, while mass-development of hydropower on practically all rivers of Kyrgyzstan has been further accelerated during last year. The World Bank website continues to display a brochure marketing the Chatkal HPP project to investors.

In addition, in early 2026, construction began on the "Chatkal Cascade" of four small-to-medium HPPs (Bashky-Terek, Korgon-Say, Chunkurchak, Aygir-Jal; total capacity ~146 MW) upstream of the World Heritage property in Kanish-Kiya ayil aimak. Financed via state-guaranteed loans (including ~61 million



Fig. 3: Chatkal HPP Brochure for investors at the World Bank website. Accessed on 15 May, 2026.
Source: https://www.worldbank.org/content/dam/infographics/780xany/2023/apr/presentations/ENERGY-Brochure-6-Chatkal-HPP-ENG.pdf



Fig. 4: Launch ceremony for hydropower cascade construction on Chatkal River upstream of the WTS in April 2026. Photo reproduced from https://rivers.help/n/6182

USD for one company) under public-private partnership with Chinese involvement (Sinomach Corporation), the project received high-level government support, including a ceremonial launch.

To RwB's knowledge, no dedicated World Heritage Impact Assessment was conducted prior to approval. Technical details are scarce, but the cascade is expected to disrupt sediment flow critical to the natural dynamics of the Chatkal riverbed and floodplain downstream within the Besh-Aral component. Additional small HPP land allocations (e.g., 31.59 ha in January 2026) further indicate ongoing energy development pressure in the Chatkal watershed.

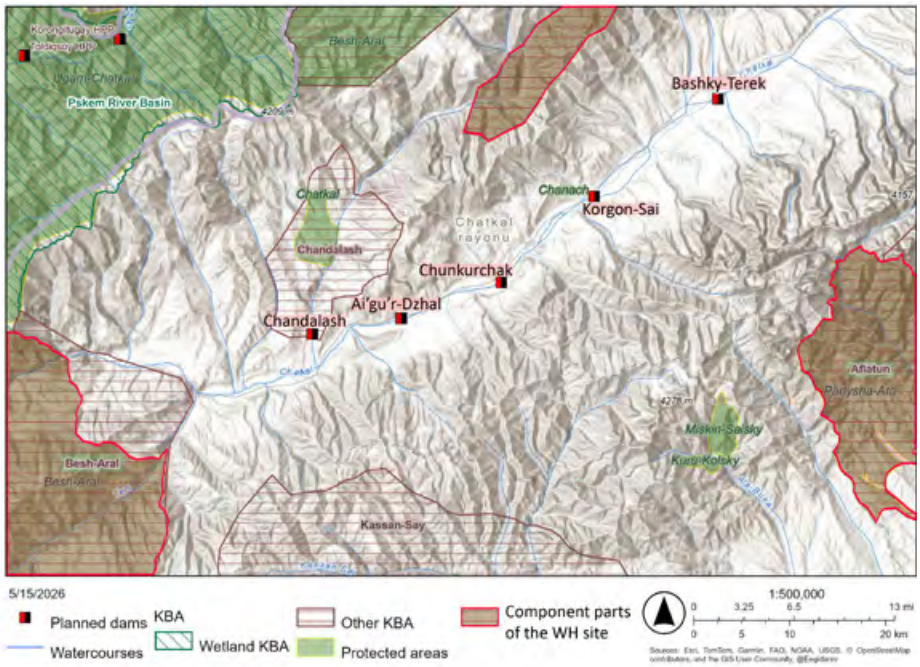


Fig. 5: Planned Chatkal Hydropower Cascade upstream from the Besh-Aral component of the Western Tien-Shan World Heritage property.
Source: RwB GIS System on Rivers of Central Asia https://www.arcgis.com/apps/mapviewer/index.html?webmap=cadb59d8d14d43919230947a2cfaa91a

A comprehensive consolidated list and map of hydroelectric projects on relevant watersheds requested by the World Heritage Committee for a Strategic Environmental Assessment review, most likely, has not been compiled by the three State Parties.

Recommendations

The next joint State of Conservation report by the three State Parties is due by 1 December 2026 for the 49th Committee session and is very likely not to be disclosed again. Observers fear that boundary modifications could be advanced even earlier through less transparent channels, evading public and expert scrutiny — consistent with past shortcomings in the property's inscription (inadequate maps and protection regimes).

Kazakhstan's Committee membership continues in 2026 and its insistent lobbying to weaken the protection of the WTS World Heritage may create perverse incentives for all States Parties. Without stronger enforcement, including potential inscription on the List of World Heritage in Danger if threats materialise, the OUV of Western Tien Shan — particularly its riverine ecosystems — faces irreversible damage from fragmentation, altered hydrology, and habitat loss.

Civil society should urge the Committee to:

- Demand from the State Parties transparent, publicly available State of Conservation reports and full HIAs/SEAs of developments potentially affecting the WTS.
- Insist on genuine boundary modifications that enhance rather than diminish the protection of critical habitats and connectivity.
- Enforce permanent mining cessation and rehabilitation in the Besh-Aral ecosystems, including liquidation of the illegally built road.
- Require independent expert review of all hydropower projects affecting the property or its setting.
- Strengthen transnational governance with sustainable financing and standardised monitoring.

The Western Tien Shan stands at a crossroads: meaningful reform and protection are still possible, but current trajectories favour short-term development over long-term conservation of this irreplaceable biodiversity hotspot. Urgent international oversight is essential.

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The Tugay Forests of Tigrovaya Balka Face Imminent Degradation

Eugene Simonov, Rivers without Boundaries

Inscribed on the World Heritage List in 2023, the Tigrovaya Balka Nature Reserve in Tajikistan represents the largest and most intact tugay forest ecosystem in Central Asia. Recognized under criterion (ix) for its outstanding continuous ecological and biological processes, the property's survival is entirely dependent on the hydrological dynamics of the Vakhsh River. However, the 2025 IUCN Conservation Outlook Assessment (COA) classifies the site as being of "Significant Concern" with a deteriorating trend, primarily due to the severe alteration of the river's hydrological regime by upstream dams.

Currently, the reserve stands at a critical crossroads. The ongoing development of the Vakhsh Hydropower Cascade — most notably reconstruction of the Nurek HPP and construction of the massive Rogun Hydropower Project (HPP) — threatens to permanently institutionalize water scarcity in the floodplain. Without a prompt, binding decision to guarantee environmental flows (e-flows) that deliver artificial floods to the floodplain forests, Tigrovaya Balka will inevitably undergo irreversible desertification, salinization, and the complete loss of its Outstanding Universal Value (OUV).

The Hydropower threat and the neglect of ecosystem needs

For over half a century, the natural spring and summer floods that historically inundated the Vakhsh valley have been severely curtailed by upstream infrastructure, beginning with the Nurek dam in the 1960s. These seasonal floods are the fundamental driver of the tugay ecosystem: they facilitate the natural regeneration of Asiatic poplars (*Populus pruinosa*), flush accumulated salts from the soil, replenish groundwater reserves, and provide critical spawning habitats for endangered endemic fish species, such as the critically endangered Large Amu-Darya shovelnose sturgeon (*Pseudoscaphirhynchus kaufmanni*).

The construction of the Rogun HPP, featuring a 13-cubic-kilometer active reservoir, will become the uppermost and largest regulatory body in the Vakhsh Cascade. Once operational, it will possess the capacity to fully regulate downstream flows. Instead of utilizing this infrastructure to mitigate past ecological damage, the project's environmental planning has systematically neglected the needs of Tigrovaya Balka.

As highlighted in a November 2025 joint appeal to UNESCO by Rivers without Boundaries and other conservation organizations, the Environmental and Social Impact Assessment (ESIA) for the Rogun HPP, published in summer 2025, astonishingly denies any downstream impacts on the World Heritage property. Furthermore, the 2025 ESIA deliberately refutes the implementation of artificial floods — the most viable and scientifically supported offset measure — dismissing it as "too complicated" without conducting a proper feasibility study.



Fig. 1: So-called "Ecological engineering" in the Tigrovaya Balka in 2026.
Source: Avesta.tj. https://avesta.tj/2026/04/14/v-zapovednike-tigrovaya-balka-provodyat-raboty-po-uluchsheniyu-gidrologicheskogo-sostoyaniya/

The ESIA relies on vague, unenforceable water-sharing commitments rather than binding environmental flow regimes, violating the precautionary principle and failing to meet the World Bank's Environmental and Social Standard on Biodiversity (ESS 6). If the Rogun reservoir is filled and operated solely for energy and irrigation maximization without strict, enforceable reservoir operation rules mandating artificial floods, the long-term deterioration of the tugay ecosystem will be accelerated.

Haphazard local interventions vs. systemic hydrological restoration

In the absence of a comprehensive, basin-wide environmental flow regime, site managers and national authorities have increasingly resorted to localized engineering interventions inside the reserve. While intended to alleviate immediate water stress, these measures represent a dangerous paradigm shift away from true ecological restoration.

A stark example occurred in April 2026, when the National Committee for Environmental Protection deployed heavy excavators into the heart of Tigrovaya Balka. As reported by local media, these works involved digging up the reserve to install artificial culverts and mechanically clearing channels of silt to force "normal water circulation."



Fig. 2: "Ecological engineering" in the Tigrovaya Balka in 2026.
Source: Avesta.tj. https://avesta.tj/2026/04/14/v-zapovednike-tigrovaya-balka-provodyat-rabo-ty-po-uluchsheniyu-gidrologicheskogo-sostoyaniya/

These hard-engineering projects are fundamentally flawed for several reasons: First, they are haphazard, stopgap measures that fail to address the root cause of the ecosystem's decline — the lack of a landscape-level flood pulse. While channelling minimal surface water may briefly sustain existing mature trees, it is incapable of triggering the large-scale geo-morphological processes required for seed dispersal and the natural propagation of new tugay groves. Second, these invasive works have not been subjected to a rigorous Heritage Impact Assessment (HIA). The use of heavy machinery, the alteration of natural oxbows, and the introduction of concrete and metal infrastructure into a strictly protected nature reserve degrade the ecological integrity of the site.

Third, such interventions exacerbate human encroachment. Maintaining this artificial plumbing requires continuous human presence, regular dredging, and infrastructure upkeep, slowly transforming a wild, dynamically evolving floodplain into a heavily managed, semi-artificial landscape.

As noted in the 2025 IUCN COA, support for the ecosystem through semi-artificial propagation and hydro-engineering structures on-site has a highly limited effect and can result in serious additional negative impacts, such as lowering groundwater levels and altering sediment distribution. Replacing natural river dynamics with localized ditch-digging is not a viable strategy for preserving the site's OUV.

The urgent need for action

The survival of Tigrovaya Balka cannot be secured by localized earthmoving within its boundaries. It requires a systemic, basin-wide commitment to sustainable water management. The 2023 World Heritage Committee decision inscribing the property explicitly requested the State Party to "secure and maintain a natural hydrological regime for the property with sufficient provision of water to the property to maintain its Outstanding Universal Value." This directive is currently being ignored.

To prevent the loss of Tigrovaya Balka's OUV, the following urgent actions must be taken by the State Party, international financial institutions (including the World Bank and AIIB), and the international conservation community:

1. **Mandate Artificial Floods:** Enforceable reservoir operation rules for the Rogun Reservoir and the entire Vakhsh Cascade must be legally established to ensure the release of appropriate environmental flows. These flows must mimic the natural spring/summer flood pulse, providing adequate volume and duration to support the continuous ecological processes of the tugay forest.
2. **Require Comprehensive Heritage Impact Assessments (HIA):** An independent HIA, adhering to the 2022 UNESCO Guidance and Toolkit, must be conducted for the downstream impacts of the Rogun HPP. Furthermore, all localized hydro-engineering projects and channel modifications *inside* the Tigrovaya Balka Nature Reserve must be immediately halted until they undergo a strict HIA to evaluate their impacts on the property's integrity.
3. **Revise the Biodiversity Management Plan (BMP):** The BMP for the Rogun HPP must be updated to include comprehensive mitigation measures to safeguard the World Heritage property and protect endemic, endangered aquatic species. These commitments must be integrated into the Environmental and Social Commitment Plan (ESCP) as a strict precondition for project financing.
4. **Shift from Engineering to Ecological Management:** Management plans for the reserve must pivot away from invasive, localized infrastructure projects and focus instead on integrating the protected area into a broader, harmonized regional landscape management framework that prioritizes the restoration of the Vakhsh River's natural dynamics.
5. **Urgent UNESCO action needed.** To prevent degradation and enable enactment of measures above, the UNESCO World Heritage Centre must request that the Tajikistan Government urgently submits a State of Conservation Report for the World Heritage Committee's consideration at its 49th Session in 2027.

The last window of opportunity will be closing soon

Tigrovaya Balka was inscribed on the World Heritage List to protect an ecosystem shaped by the untamed forces of water and sediment. Unfortunately, despite regular attempts by conservation NGOs to urge the IUCN and World Heritage Centre to engage Tajikistan, the World Bank and 10 other international banks financing the project in the discussion on how to save Tigrovaya Balka, no visible reaction has been observed in the

public space in 2024-2026, suggesting that efforts to resolve this problem have been insufficient and inconsistent.

We are now in a narrow window of opportunity where the operational parameters of the Vakhsh Hydropower Cascade, specifically the Rogun dam, are being finalized. If financiers and the State Party fail to make a prompt, binding decision to guarantee environmental flows with artificial floods, the Vakhsh River will become permanently sterilized. Localized engineering patches will not save the reserve; they merely mask the ongoing ecological collapse. Without the return of the flood pulse, the tugay forests will succumb to desertification, and Tigrovaya Balka will irreversibly lose the Outstanding Universal Value for which it was recognized by the global community.

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Strategic Environmental Management Plan for the Sundarbans Must Involve IUCN and UNESCO

Sultana Kamal and Sharif Jamil, National Committee for Saving the Sundarbans (NCSS) and Dhoritri Rokhhay Amra (DHORA)

Over time, NCSS and DHORA have continued advocacy efforts with the UNESCO World Heritage Committee in collaboration with Earthjustice and World Heritage Watch. The key developments and activities are outlined below:

Findings of the Monitoring Report on Rampal Coal Power Plant

During the tenure of the Interim Government, the Centre for Environmental and Geographic Information Services (CEGIS) published, for the first time, a monitoring report on the Rampal Coal Power Plant. The report revealed significant environmental concerns. Between February and April 2023, CEGIS conducted four rounds of sampling to measure mercury concentrations at various sites near the plant. The findings showed mercury levels reaching approximately 0.001 mg/L — ten times higher than Bangladesh's surface water quality standard of 0.0001 mg/L.

Such elevated mercury concentrations pose serious ecological and public health risks, as mercury can bioaccumulate through plankton and fish, eventually entering the human food chain. Mercury also turns as methylmercury and entering into animal, plants, humans and microorganisms. Following sustained civic pressure, CEGIS released what is widely considered an authentic and transparent report. In response, local communities organized large public gatherings demanding the immediate shutdown of the Rampal Power Plant, located near the Sundarbans World Heritage Site in Bangladesh.

Political developments after the thirteenth parliamentary election

Following the Thirteenth Parliamentary Election, a new government has assumed office. The newly elected government and the Member of Parliament for Bagerhat-3, the state minister for the Ministry of Environment Forests and Climate Change, are apparently committed to put sincere support to take conservation efforts for the protection of the Sundarbans. It brings hope for stronger environmental protection measures in the region.

People demand to stop coal pollution and protect the Sundarbans protest mobilizations

In recent months, communities, together with NCSS and DHORA, have organized protest actions demanding the shutdown of coal-based power plants threatening the Sundarbans ecosystem.



Fig. 1: Community participants attending the mass gathering demanding the shutdown of the Barisal Coal Power Plant at Latakata Football Ground in Baliatali Union, Barguna Sadar, on Saturday, 29 November 2025. Photo: Mushfiq Arif



Fig. 2: Rally held at the periphery of Sundarbans during the observance of "Sundarbans Day" on 14 February 2026.
Photo: Noor Alam SK

A mass gathering was held on Saturday, 29 November 2025, at 3:00 PM at Latakata Football Ground in Baliatali Union, Barguna Sadar. The event demanded the immediate shutdown of the Payra 1320 MW Coal Power Plant (Phase I) to protect the Sundarbans and safeguard the lives and livelihoods of coastal fishers, farmers, and local communities in Barguna, Taltoli, and Patharghata. The gathering was jointly organized by Dhoritri Rokhhay Amra (DHORA), Barguna District Farmers Coordination Council, Latakata Fishermen Association, and Ekota Club. The event was chaired by Dr. Azmeri Begum, Convenor of DHORA Barguna.

Observance of Sundarbans Day

On 14 February 2026, Sundarbans Day was observed in Mongla under the slogan, "The Sundarbans is our mother we will not let it be destroyed." The program included a rally and a public assembly. The event was organized by DHORA, Waterkeepers Bangladesh, and Pashur River Waterkeeper, calling for urgent and decisive measures to protect the world's largest mangrove forest. As Chief Guest, Sharif Jamil urged the government to conduct an inclusive and science-based Strategic Environmental Assessment (SEA) for the Sundarbans region.



Fig. 3: Satellite image showing the unused land area of Rampal Block-B proposed for the planned solar power project.
Photo: Donna Lisenby

Country's largest solar power plant (442 MW) planned in Rampal

To enhance the energy security through diversification of primary fuel sources, the Bangladesh Power Development Board has taken an initiative to establish the country's largest 442 MW solar power plant in Rampal covering an area of 685 acres.

Since its inception, the PDB acquired 1,834 acres of land in Rampal in 2012, divided into Block-A and Block-B. Block-A currently hosts the coal-fired power plant covering 915 acres, operated by Bangladesh-India Friendship Power Company Limited, while Block-B remains under the PDB, where land development and preparatory work have already been completed.

The proposed 442 MW grid-connected solar power plant will be established on 685 acres of land **in Block-B and is expected to be completed by 2030. A feasibility study conducted by** Infrastructure Investment Facilitation Company in May 2025 recommended establishing the solar project on the 685-acre site.

However, considering the ongoing global war and fuel crisis, we urge the Ministry of Power, Energy and Mineral Resources to establish the 442 MW solar plant at Rampal near the Sundarbans as early as possible. We also call on the government to utilize the remaining 234 acres by expanding the planned solar project and to immediately initiate a transition plan to convert the existing coal plant into renewable energy infrastructure in order to protect the Sundarbans and promote a sustainable energy future.



Fig. 4: Dr. Sheikh Faridul Islam, Honourable State Minister for the Ministry of Environment, Forest and Climate Change, sharing how to protect the Sundarbans. Photo: Mehedi Hasan

Environmental gathering demanding solar plant in Rampal Coal Plant

An environmental gathering was held on May 8, 2026, in Kainmari, Mongla. Dr. Sheikh Faridul Islam, Honourable State Minister for the Ministry of Environment, Forest and Climate Change, actively participated in the event and shared the guidance on how to protect the Sundarbans. During the gathering, we urged the newly elected government to establish a 442 MW utility-scale solar power plant on the unused land in Block B of the Rampal Coal Power Plant as early as possible. The initiative was demanded to support the government's target of achieving 10 GW of solar power capacity in Bangladesh by 2030.

Conclusion

The growing scientific evidence and community mobilization underscore the urgent need to reassess coal-based development near the Sundarbans and to take urgent steps to protect the Outstanding Universal Values of the Sundarbans. The UNESCO World Heritage Centre conducted two reactive monitoring missions to the Sundarbans in 2016 and 2019 while they recommended the Sundarbans to be included in list of the World Heritage Site in Danger. But the committee did not adopt it yet. However, the UNESCO World Heritage Committee requested the state party to undertake a Strategic Environmental Assessment (SEA) of the Southwest part of Bangladesh including the Sundarbans before allowing construction and development of any largescale infrastructure. In 2021, Bangladesh government submitted a SEA report that didn't have any scientific integrity. The committee again on its 2023 session in Riyad requested Bangladesh to review the assessment with more scientific analysis. But the governments of Bangladesh did not take any visible and transparent initiative to review the faulty SEA.

Therefore, it is fundamental and crucial that the government of Bangladesh ensures a SEA that is science-based, transparent and inclusive. UNESCO World Heritage Centre and Committee need to take this seriously forward to save the Sundarbans World Heritage Site under the verge of extinction due to the hubs of coal based power plants in Rampal, Taltali and Kalapara Upazilas in Bangladesh.

Japan's Report Omits Discussion of the U.S. Military's Training in Northern Okinawa

Hideki Yoshikawa, Kawamura Mel Masami, Akino Miyagi, and Shin-ichi Hanawa



Fig. 1: World Heritage sites: Amami-Oshima Is., Tokunoshima Is., Northern Part of Okinawa Is., and Iriomote Is. (2019). Source: Japanese Ministry of the Environment

In 2025, the Japanese Ministry of the Environment released an interim draft report on the conservation status of four World Natural Heritage sites inscribed in 2021, including the Northern Part of Okinawa Island (NPOI).[1] The Report reflects the Ministry's efforts to maintain the Outstanding Universal Value (OUV) of these sites, with a generally positive evaluation of the NPOI. However, it also represents the Ministry's continued failure to address the environmental impacts of U.S. military training in the Northern Training Area (NTA) on the NPOI and Yambaru forest. To preserve the NPOI's OUV and the Yambaru forest, the Ministry must address these issues and the UNESCO World Heritage Center and IUCN urge the Ministry to do so.

The Ministry of the Environment's interim Report

The Report qualitatively assesses the status of four World Heritage sites and conservation activities, based on 20 criteria or indicators, including endangered endemic species and habitats. It compares 2020–2024 trends with the baseline information in the 2019 nomination dossier. Overall, species status is evaluated as "good," with improvements, but habitats remain a concern.

For the NPOI, three indicator species — Okinawa rai, Okinawa woodpecker, and frogs — are rated as "good" with improve-

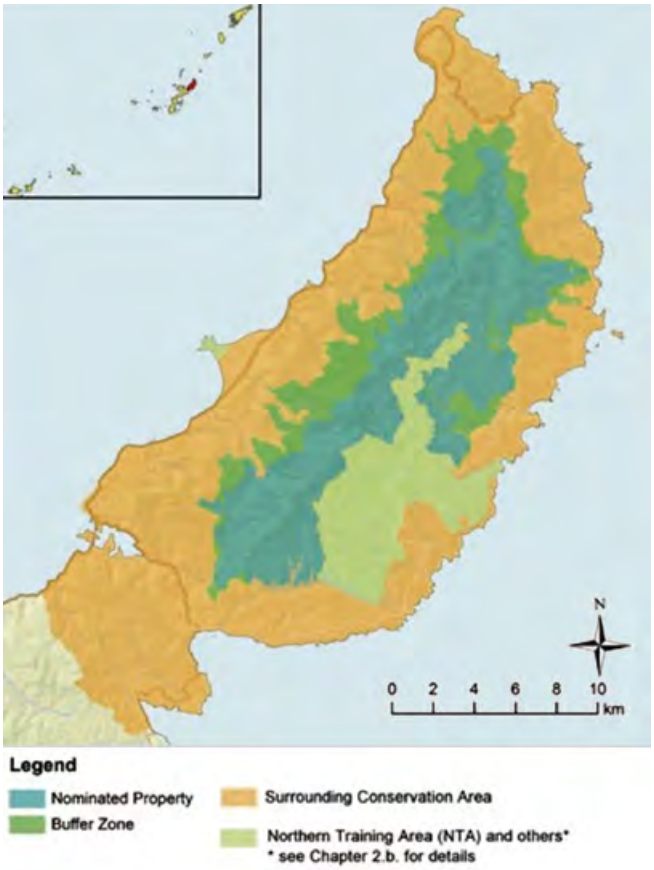


Fig. 2: The Northern Part of Okinawa Island (NPOI) and the U.S. military's Northern Training Area (NTA) (2019). Source: Japanese Ministry of the Environment



Fig. 3: A view of NPOI from a visitor center (2024): NTA is located between NPOI and the center. Source: Hideki Yoshikawa



図1．プレイバック調査地点（左）と2017年（中央）・2024年の調査結果（右）。
円の大きさは確認個体数を示す（凡例を参照）

Fig. 4: Infographic showing increases in the Okinawa woodpecker population (2025).
Source: Japanese Ministry of the Environment

過去の調査結果と比較すると、図２の通り推移しており、2024年は過去最多の確認数となった。なお、2017年の調査は、６月～７月にかけて実施されたことから、巣立ち後の幼鳥が確認されたことで確認数が多くなった可能性がある。



図２．各調査年におけるノグチゲラの確認地点率及び最大確認数

Fig. 5: The front page of a new pamphlet for the Okinawa woodpecker (2025).
Source: Japanese Ministry of the Environment



ments. Important habitats are also evaluated as "good" with improvement. All monitored species have expanded their habitats, and the Okinawa rail population has increased. These positive trends are linked to the 2016 establishment of Yambaru National Park, NPOI's designation as a WH site, and efforts by the U.S. military and the Ministry to eradicate the small Indian mongoose. It should also be noted that, in March 2026, the Ministry released a pamphlet on the Okinawa woodpecker, highlighting habitat expansion and estimating its population at 882 (515–1249).[2]

Meanwhile, the Report acknowledges ongoing issues with protection and management, including increased roadkill of the Okinawa rail and Ryukyu long-furred rat, ongoing poaching, and invasive species in the NPOI and surrounding areas. It calls for more effective measures and improved assessments.

No information on the environmental impacts of military training

The Ministry's Report omits two critical types of information: the environmental impacts of military training in the NTA on the NPOI and the U.S. military's waste left in areas of the NPOI returned to Japan in 2016 and incorporated into the NPOI. This omission undermines the 2016 Japan-U.S. agreement on NPOI conservation and the 2023 agreement. The habitat increases of the Okinawa woodpecker and the Okinawa rail do not justify the Ministry's failure to conduct such studies.



Fig. 6: U.S. military vehicles ready to enter the NTA (2023). Source: Akino Miyagi

The NTA covers 3,533 hectares and borders the 7,771-hectare NPOI. With conservation measures in place, it is considered a buffer zone for the NPOI. The U.S. Marine Corps conducts Jungle Warfare Training and aircraft flight training, involving the MV-22, which produces significant noise and "rotorwash",[3] and the CH-53 helicopters, which emit similarly significant noise. Aircraft carry out take-offs and landings at 16 Landing Zones, and low-altitude terrain flights (16-60 meters above ground) around the NTA and NPOI. Recently, joint exercises with the Japan Self-Defence Forces and with military forces from other nations have intensified.



DEPARTMENT OF THE NAVY
OFFICE OF THE JUDGE ADVOCATE GENERAL
1322 PATTERSON AVENUE SE SUITE 3000
WASHINGTON NAVY YARD DC 20374

IN REPLY REFER TO:
[redacted]
May 9, 2022

SENT VIA FOIA ONLINE AND EMAIL
[redacted]

SUBJECT: FREEDOM OF INFORMATION ACT (FOIA) REQUEST DON-USMC-2021-[redacted] FOIA APPEAL DON-NAVY-[redacted]

This letter responds to your FOIA appeal submitted on March 16, 2022 FOIA and assigned tracking number DON-NAVY-[redacted]. Your underlying FOIA request was submitted to Marine Corps Installations Pacific (MCIPAC), the initial denial authority (IDA), on March 26, 2021, but was received by the IDA on August 30, 2021 and assigned tracking number [redacted]

Fig. 7: U.S. Military's Reply to FOIA Request regarding Environmental Impacts of Military Training. Source: U.S. Department of Navy

The 2012 U.S. military Environmental Review acknowledges the potential impacts of aircraft training on the NTA and Yambaru forest and recommended additional surveys to safeguard endangered species.[4] The 2019 Integrated Natural and Cultural Resources Management Plan also discusses concerns regarding further environmental impacts resulting from training activities within the reduced NTA area.[5] Scientific studies suggest that avian species are susceptible to aircraft noise, which can affect their behaviour and physiology.[6] Although these effects may be temporary and some species adapt accordingly, the long-term consequences remain uncertain. Further research is required to evaluate these impacts and to support conservation efforts.

Despite all of this, the Ministry has not investigated the environmental impact of U.S. military flight training. It has cited budgetary and technical constraints as reasons for this omission.[7] It has also asserted that the U.S. military's compliance with its own conservation guidelines makes independent assessments unnecessary.

Meanwhile, the U.S. military has not published monitoring results on the effects of aircraft training on endangered birds. A request under the U.S. Freedom of Information Act has been made, but the reports have not been released for four years. When such information is withheld, the Ministry cannot include it in its reports, and it seems to lack the will or capacity to monitor environmental impacts independently.

Okinawa Defence Bureau's monitoring of U.S. military aircraft noise

With the Ministry silent and the U.S. military withholding data, the Okinawa Defence Bureau (ODB) — responsible for monitoring military training facilities —provides the only available acoustic metrics. For example, the ODB monitoring at the Takae Community Center, located 1.4 km from Landing Zone 4 (LZ4) and 3.5 km from the NPOI boundary, routinely records noise exceeding 60 dB.[8] In avian species, 60 dB represents the critical acoustic masking threshold.[9]

Between April 2024 and February 2025, the ODB logged 1,474 noise events exceeding 60 dB at Takae, though the duration of each event was unrecorded. Given the area's remoteness, the 511 evening and night events are presumed to be military aircraft flights.

Noise Intensity (Max: 91.5 dB)	Time Distribution
• >60 dB: 1,474 events • >70 dB: 259 events • >80 dB: 24 events	• 07:00–17:00: 453 events • 19:00–22:00: 433 events • 22:00–07:00: 83 events

The noise of aircraft is often accompanied by vibrations that affect communities. Local residents' houses rattle, and trees tremble when aircraft fly low overhead, producing low-frequency noise.[10] The noise at peak loudness and shaking lasts for 10 seconds or longer. Sometimes, the noise continues for 10 minutes or longer with the aircraft circling over the communities. Similar or greater impacts from U.S. military aircraft are likely in the NPOI during low-altitude terrain flights. There is also a high likelihood that rotorwash from the MV-22 causes physical and thermal impacts in the NTA and its surroundings.

The U.S. military's waste in the NPOI

The Ministry's Report does not mention U.S. military waste in the returned areas of the former NTA, now part of the NPOI since late 2016. The Ministry attributes responsibility for the removal and disposal of it to the ODB but has not reported the issue to the UNESCO WH Centre or the IUCN, deeming such reporting unnecessary.[11]

The U.S. military has also delegated the issue in the NPOI to the Japanese government, specifically to the ODB, under the Status of Forces Agreement (SOFA) between the two countries. It is unclear if there is any cooperation between the U.S. military and the ODB in locating the waste in the NPOI.



Fig. 8: An MV-22 Osprey flying low over the local road near the NPOI (2021). Source: No Helipad Takae Resident Society

The ODB has addressed the issue of U.S. military waste in the NPOI since one of the authors of this report problematized it in 2017. The ODB-commissioned reports, obtained by two authors of this report under Japan's Act on Access to Information Held by Administrative Organs, indicate that there is an enormous amount of military waste left in the NPOI. It is unclear how long it will take to remove and dispose of all the waste and to restore the environment.



Fig. 9: Photos of Blank Shells in the 2023 ODB-Commissioned Report. Source: The Okinawa Defence Bureau

The ODB reports from March 2022 to May 2023 document the recovery of large quantities of military waste directly from the NPOI:[12]

- **General Debris:** 3,783 kg of discarded plastic, metal, glass, and related waste.
- **Live/Spent Ordnance:** 18,799 blank shells containing gunpowder residue, totaling 163.88 kg.
- **Explosive Hazardous Waste:** 70 hazardous items, including 30 flare shells and 12 grenades with active explosive residues (6.6 kg).

Critically, these hazardous materials litter the habitats of endangered and endemic flora and fauna.

A particular incident has also revealed the complexity of waste issues in the NPOI. In 2019, new blanks were found at the NPOI's WH nomination site, raising questions about their disposal.[13] One theory is that the U.S. military intentionally discarded them there for the ODB to remove. Another is that, due to unclear boundaries between the NPOI and the NTA, the military may have accidentally crossed into the NPOI and left waste behind. While the details of the incident remain unknown, it highlights issues with waste from ongoing military training and boundary ambiguities.

Protest against the U.S. military's activities to safeguard the NPOI

The Ministry's Report is not required to include the history of protests against the U.S. military's activities in the Yambaru forest; however, such historical efforts should inform the Ministry's understanding of the NPOI and the Yamabaru forest. Since the NTA was established there in 1957 under the U.S. occupation of Okinawa, local protests have played a pivotal role in preventing the destruction of the Yambaru forest.

In 1970, local residents protested and stopped the U.S. military's live-fire exercise on Ibu Mountain by occupying the firing range, now part of the NPOI. In 1987, residents protested and halted construction of the landing zone for Harrier jets in the NTA's Aha area, which could have jeopardized the WH inscription due to environmental damage the aircraft would have caused. From 2007 to 2016, clashes between opponents of new landing zones in the NTA and



Fig. 10:. Protesters Confront the Okinawa Defence Bureau over Aircraft Landing Zone Construction in the NTA (2011). Source: Hideki Yoshikawa

riot police highlighted issues around conserving the Yambaru forest and the WH inscription.

We are alarmed, however, as we have witnessed the police force harassing and intimidating people who protest and report on the U.S. military's training in the Yambaru forest.14 Environmental defenders' actions should be recognized as legitimate and necessary to ensure the UVO of the NPOI. They should be encouraged, not suppressed.

Recommendations

To safeguard the OUV of the NPOI, the WH Centre and IUCN should urge the Ministry of the Environment to take the following measures in coordination with the ODB and the U.S. military:

- **Conduct comprehensive impact studies** on U.S. military training noise and rotorwash within the NPOI and its buffer zones and report them to the WH Centre and IUCN.
- **Integrate ODB military waste data** and unexploded ordnance records directly into all future NPOI evaluations and report them to the WH Centre and IUCN.
- **Guarantee the protection and civil rights** of local environmental defenders monitoring the Yambaru forest.

Notes

1 Ministry of the Environment (2025). Monitaringu ni motozuku chukan hyoka shiito (an) [Interim report sheet based on monitoring results (Draft)]. https://kyushu.env.go.jp/okinawa/amami-okinawa/meeting/science/pdf/a-3-0701/a-3-0701-12.pdf

2 Ministry of the Environment (2026). Noguchi Gera: Yambarunomori ni sumu kitsutsuki [The Okinawa woodpecker: Woodpecker in Yambaru Forest]

3 Ryukyu Shimpo (2014). "Ospreys eight times lounder than the CH-53 helicopter." May 27, 2014. https://english.ryukyushimpo.jp/2014/06/04/14177/

4 Department of the Navy. (2012). Final Environmental Review for Basing MV-22 Aircraft at MCAS Futenma and Operating in Japan. Marine Corps Installations Pacific. https://www.mod.go.jp/j/approach/anpo/osprey/pdf/env_review.pdf

5 Marine Corps Installations Pacific. (2019). Integrated Natural and Cultural Resources Management Plan (INCRMP) for Marine Corps Installations Pacific Training Areas, Okinawa, Japan. U.S. Marine Corps. https://www.mod.go.jp/j/approach/anpo/osprey/pdf/env_review.pdf

6 Engel, M.S., Young, R. J., Davies, W. J., Waddington, D., and Wood, M. D. (2024). "A Systematic Review of Anthropogenic Noise Impact on Avian Species." Current Pollution Reports 10:684–709. https://doi.org/10.1007/s40726-024-00329-3
Also see Civil Aviation Study (2023). The Effects of Aircraft Noise on Biodiversity. https://www.caa.co.uk/publication/download/20406

7 The Ministry's responses cited here are from NGOs' meeting with the Ministry in April 2025 and November 2025.

8 We have borrowed copies of the ODB's monitoring records from the Takae Community Center for analysis.

9 Hardman, S. I., Zollinger, S. A., Koselj, K., Leitner, S., Marshall, Rupert C., and Brumm, H. (2017). "Lombard effect onset times reveal the speed of vocal plasticity in a songbird." Journal of Experimental Biology, 220(6), 1065–1071. https://doi.org/10.1242/jeb.148734

10 This information is obtained through the Yambaru Forest World Heritage Watch Project (2023).

11 The Ministry's responses cited here are from NGOs' meetings with the Ministry of the Environment in April 2025 and November 2025.

12 IDEA Consultants, Inc. (Ministry of Defence commissioned company) (August, 2022). Hokokusho hokubukunrenjyo henkan-atochi haikibutsu chosa (3) [Report 3 on waste materials in the returned areas of the Northern Training Area].
IDEA Consultants, Inc. (Ministry of Defence commissioned company) (March, 2023). Hokokusho hokubukunrenjyo henkan-atochi haikibutsu chosa (4) [Report on waste materials in the returned areas of the Northern Training Area].

13 Yuichi Shioiri (2026). "Kuho shori gyosha ni tanomu [The ODB asked a private company to dispose of unused blanks]. May 9, 2026.The Okinawa Times. https://www.okinawatimes.co.jp/articles/gallery/1833226

14 In March 2023, the Okinawa police conducted a house search of the two local residents, including one of the authors of this report, and confiscated personal propeteis such as phones and comuputers for their December 2022 protest and monitoring action regarding the U.S. military's training in the Yambaru forest. The two have filed a lawsuit against the police, claiming that the house search was an excessive use of police power, thus illegal. See The Okinawa Times (2026). "Beigun kogi de sosa kunibaishoseikyu nahachisai ni higashisonno futari uttae [Two Higashi villagers filed a lawsuit regarding police house search for their protest against U.S. military]." September 27, 2025. https://www.okinawatimes.co.jp/articles/-/1679162

Multiple Threats and Little Progress on the Great Barrier Reef

Imogen Zethoven, on behalf of the Australian Marine Conservation Society and WWF-Australia

The IUCN World Heritage Outlook 4 report found that the outlook for the Great Barrier Reef is "critical".[1] This is the same finding as the Outlook 3 report. The latest report found that the World Heritage values of the Reef remain under serious pressure, and some attributes are increasingly vulnerable to escalating and compounding threats, most notably climate change.

Ocean heating and extreme weather impacts

At the time of writing (early February 2026), the Great Barrier Reef has not experienced a severe or mass coral bleaching event, though there are many weeks remaining before the threat is over. The latest email update (29 January 2026) from the Great Barrier Reef Marine Park Authority states that sea surface temperatures have been slightly above the long-term average for this time of year.

Last year, half the World Heritage property (the Far Northern and Northern regions) experienced a widespread coral bleaching event.[2] This event was the sixth since 2016, and the second back-to-back coral bleaching event since 2016–2017. The previous year (2024) had seen a mass coral bleaching event that had the largest spatial footprint ever recorded on the Reef.

Other climate-related extreme weather events have increased pressure on the property. In January this year, Cyclone Koji passed across the Reef, making landfall as a Category 1 and forming a tropical low. The weather event cooled sea temperatures somewhat but resulted in heavy rainfall in the Wet Tropics and Mackay–Whitsunday and Fitzroy catchments. Some rainfall stations recorded more than 300 mm, with parts of the Mackay–Whitsunday region receiving over 500 mm.

Flood plumes from rivers in the Wet Tropics and Mackay–Whitsunday catchments have extended into the World Heritage property. According to the Reef Authority's latest email update, these plumes contain freshwater and sediments and may be contributing to coral bleaching and recent mortality on some inshore reefs.

In addition, a trough and tropical low brought heavy rainfall to Far Northern Queensland. Some weather stations recorded 200–300mm of rain, increasing the likelihood of freshwater runoff from Cape York catchments into the property. Last summer (February 2025) a monsoonal trough over North Queensland led to many rivers in the region reaching major flood levels, resulting in large flood plumes of freshwater and sediment entering the property in the northern region.

The increasingly frequent marine heatwaves and extreme rainfall events are taking their toll on the property, particularly the inshore coral and seagrass ecosystems and coral reefs not situated in areas exposed to cooler upwellings and currents.

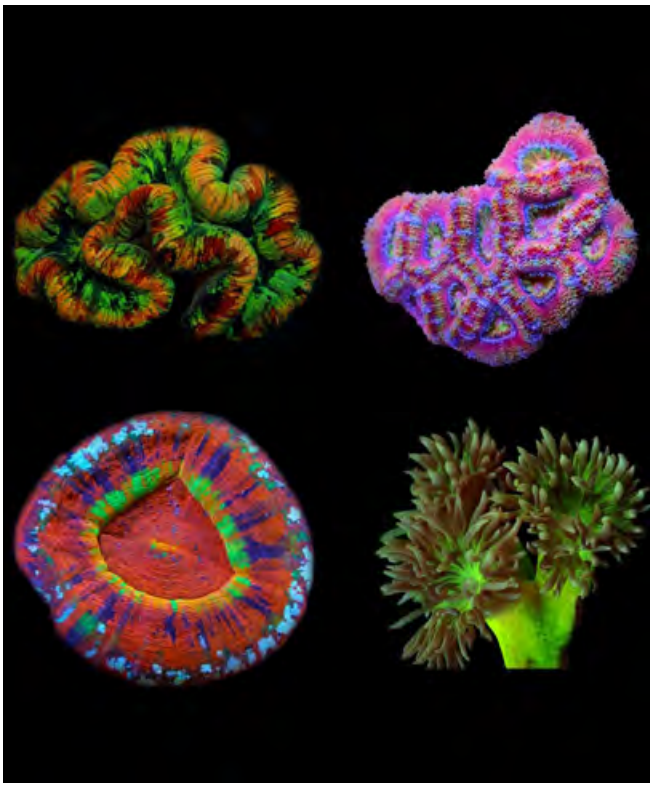


Fig. 1: The beauty of corals that humanity may lose. Image: Ciemon Caballes

Climate Policies and Actions

Last year the Australian Government submitted its Nationally Determined Contribution to UNFCCC including a 2035 emissions reduction target of 62–70% below 2005 levels. While this is a progression from its 2030 target of 43 % emissions reduction, neither targets are 1.5°C aligned. The Australian Government reaffirmed its commitment to net zero emissions by 2050.

Australia is not on track to limit temperature increases to 1.5°C above pre-industrial levels, a critical threshold for the Great Barrier Reef. Climate science shows that Australia needs to reduce its emissions by at least 90% by 2035 and achieve net zero before 2040 to be aligned with the Paris Agreement goals of stabilizing global warming to 1.5°C. Australia has significant capacity to do this.

In late 2025, Australia's Climate Change Minister, Chris Bowen signed the Belem Declaration to phase out fossil fuels. Mr Bowen was appointed the 2026 COP31 president of negotiations. While this is a very positive step, Australia remains one of the world's top three exporters of fossil fuels (coal and gas). The Albanese Government continues to approve new or expanded fossil fuel projects.

Unfortunately, in December 2025 the Queensland Government passed legislation to scrap Queensland's ambitious renewable energy targets. In October 2025, the Queensland Government announced a 5-year roadmap for Queensland's energy system. While it acknowledges the ongoing need for renewable energy, it commits Queensland to more coal and gas generation and provides no definitive closure timeline for the state's coal-fired power stations.

While the former Queensland Government's emissions reduction target of 75% below 2005 levels by 2035 has not been scrapped, the abandonment of the renewable energy target, the decision to keep open coal-fired power stations and support for doubling Queensland's gas-fired power over the next decade mean that the target is highly unlikely to be achieved.

Water quality policies and actions

After ten years of effort and significant investment, it is extremely disappointing that the 2025 water quality targets have not been met, given that poor water quality is the second biggest threat to the Great Barrier Reef and a threat entirely within the capacity of Australia to mitigate.

The progress achieved in the past 20 years is still well-short of the reductions needed. Current progress indicates that sediment reduction targets will not be met until 2047, and critical nitrogen targets will not be reached until 2114. A Reef Water Quality report card has not been released since 2024.[3] A report card is expected this year, but it is unlikely to be released early enough for the results to be considered in this year's World Heritage Committee draft decision.

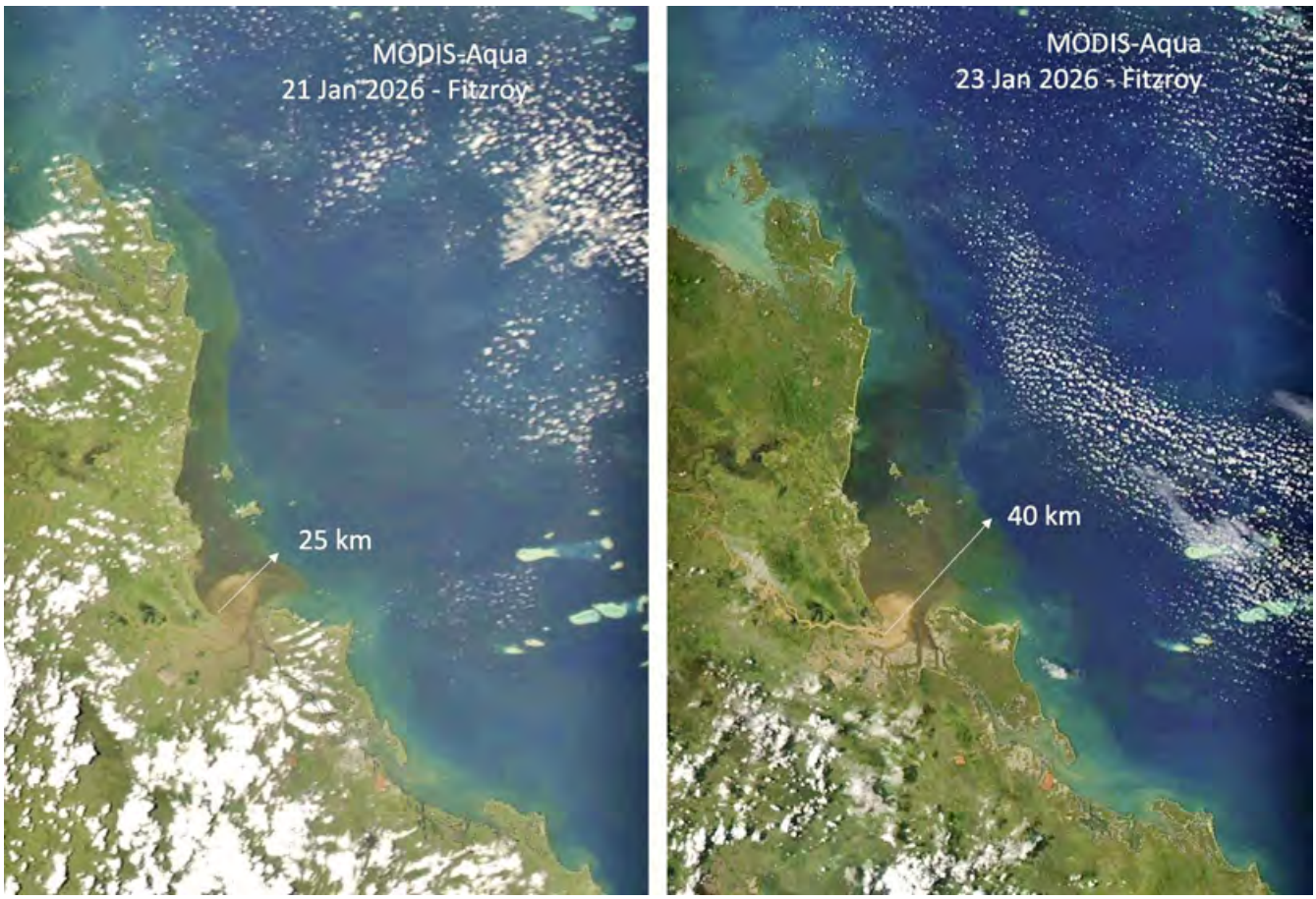


Fig. 2: Modis-Aqua data of the Fitzroy River plume (21 Jan 2026 and 23 Jan 2026, True colour image).
image: Snapshot extracted from the EOSDIS Worldview Browser (@NASA) by TropWATER, James Cook University (https://worldview.earthdata.nasa.gov/)



Fig. 3: Giant clams on Orpheus Island died after extended exposure to turbid freshwater plumes in February 2025. Photo: JCU TropWAter © jendives

The Water Quality Improvement Plan 2017–2022 has not yet been updated. The process to do so began in early 2024 and is still underway two years later. A draft was released for public comments in October last year but was roundly criticized by all stakeholders, the Reef 2050 Advisory Committee and Reef 2050 Independent Expert Panel. The Plan, which is now called a catchment water quality strategy, is unlikely to be completed until later this year. The Strategy is expected to extend to 2030. A review of end-of-catchment water quality targets for the 35 river basins within the entire GBR catchment is still being finalised.

While there has been significant investment over the last 20 years to improve Reef water quality, it has been insufficient to achieve the existing 2025 targets and will very likely be insufficient to achieve the 2030 targets.

The Queensland Government made a commitment of $ 289.6 million over five years to 2025–2026 to improve reef water quality. At the time of writing, no announcement has been made of ongoing funding through to 2030.

In 2022, the Australian Government announced its Reef funding through to 2030. The overall level of funding has not changed, though it is being allocated in different ways. The $200m to repair eroded gullies is a very positive step but again much more is needed to meet the sediment target.

A bright spot is the Australian Government's response to the World Heritage Committee's request to address vegetation clearing in the Reef catchment. The Queensland Government had made it clear that it was not prepared to strengthen Queensland's vegetation law. Late last year, the Australian Government passed amendments to the *Environment Protection and Biodiversity Conservation Act 1999* that require any clearing proposal within 50 m of a reef watercourse, a wetland or a drainage line within the Reef catchment to be assessed under the Act, even if the clearing proposal is approved or allowed "as of right" by the Queensland Government.

In addition, any proposal to clear vegetation that has not been cleared for 15 years must also be assessed for its impact on a Matter of National Environmental Significant (the list of MNES includes World Heritage). This clause is national in scope and should reduce the level of clearing of Category X in the Reef catchment.

These clearing restrictions came into effect immediately to avoid panic clearing. The passage of these clauses is a big step forwards for biodiversity and water quality protection. It is crucial that the federal environment department monitors and enforces any illegal clearing during the first six months of these reforms coming into effect, until the National Environmental Protection Agency (to be established by 1 July 2026) takes over that responsibility.

Fisheries policies and actions

The phase out of gillnet fishing from the World Heritage property is largely on track with the transitional 'NX' gillnet fishery set to end by mid-2027. Electronic monitoring has been implemented on all vessels in the NX fishery.

The Queensland-managed Coral Fishery is permitted to extract up to 190 tonnes of coral each year from the Great Barrier Reef, comprising 50t of specialty corals and 140 t of other species, including *Acroporidae, Pocilloporidae* and soft corals. However, the increasing frequency and severity of climate-induced disturbance events impacting the Reef raises serious questions about the compatibility of the "fishery" with the protection and conservation of the property. The future of the "fishery" lies in captive bred corals and tank-based aquaculture. Securing a World Heritage draft decision that requests a phase out of the Queensland Coral Fishery is a high priority for civil society NGOs this year.

On 31 December last year, the Queensland Government moved regulatory amendments to reduce the biomass target for Spanish Mackerel from 60 %, which was the target for all com-

mercial species in the Queensland Sustainable Fisheries Strategy, to 48%. This sets a dangerous precedent. The government also released a harvest strategy for the fishery which increases the Total Allowable Catch and recreational bag limits, despite the new stock assessment still showing a long term negative trend in biomass.

In January this year, the Queensland Government released a policy for implementing electronic monitoring on the trawl fleet. This is a big step forward for the fishery, but it is far from perfect. Cameras will be installed on vessels that are responsible for 90% of the fishing effort in the fishery (164 of 243), however, the remaining 79 active boats have just as much chance of interacting with threatened, endangered and protected species (if not more).

The government has also slowed implementation of the program. It will now be implemented over a six-year period, June 2026-2032, with 50 boats receiving cameras in the first two years. Unfortunately, the government has not committed to a minimum level of footage review, stating this will be 'risk-based'. As it stands, the electronic monitoring program does not meet Reactive Monitoring Mission report recommendation.

Boundary Modifications

The situation with respect to reporting boundary modifications has not changed. The Australian Government has never requested a boundary modification, nor does it believe one is required despite numerous changes to the boundary, mainly due to reclamations.

Conclusion

In recent years, advances in the conservation and protection of the Great Barrier Reef have been largely due to oversight by the World Heritage Committee of State Party policy and action and AMCS is deeply thankful of that. We continue to urge UNESCO, IUCN and the Committee to (1) examine State Party policy and action to protect and conserve this imperilled ecosystem, (2) to express extreme concern about repeated thermal stress events and ongoing local threats in particular poor water quality, and (3) to request with the utmost urgency that policies and actions are put in place to protect and conserve the OUV of this iconic World Heritage property.

Notes

1 https://worldheritageoutlook.iucn.org/explore-sites/great-barrier-reef

2 https://www.aims.gov.au/sites/default/files/2025-04/Reef%20Snapshot%20Summer%202024-25.pdf

3 The Queensland Government released a Reef water quality report card for 2021 and 2022 on 30 May 2024: https://www.reefplan.qld.gov.au/tracking-progress/reef-report-card/2021-22

Nullarbor Plain, Australia – World's Largest Arid Limestone Karst System Under Threat

Stefan Eberhard, Save The Nullarbor Inc.

The Nullarbor Plain in Australia is recognized nationally and internationally for its Outstanding Universal Values (OUVs). A compelling case exists for its urgent nomination to the World Heritage List to protect its OUVs which are threatened by a proposed colossal renewables-powered hydrogen / ammonia production and export project.

The Nullarbor Plain is the world's largest arid limestone karst region.[1] Its land area of 220,000 square kilometres adjoins the Great Australian Bight and stretches for ~850 kilometres east-west between the states of South Australia (SA) and Western Australia (WA) (Fig. 1). About one-third of the Nullarbor karst lies in SA and the other two-thirds in WA.



Fig. 1: Australia showing the location of the Nullarbor Plain and its vast limestone aquifer (dark blue). *Map: Save The Nullarbor Inc.*

In 1992, a comprehensive study by Australian scientists determined that the Nullarbor meets all four of UNESCO's natural heritage criteria for World Heritage: superlative natural phenomena and exceptional natural beauty; major stages of the Earth's history; significant on-going ecological and biological processes; and important natural habitats for biodiversity.[2]

The Nullarbor's OUV's are based on its karst landforms (Fig.s 2 & 3), its caves (Figures 4 & 5), and associated features such as cave minerals, speleothems (Fig. 6), palaeo-environmental records, sub-fossil bones (Fig. 7), and rare or endemic subterranean species and ecosystems (Fig. 8).[2] The Nullarbor is recognised as one of the world's great karst regions, however, the bid for World Heritage nomination was not supported by the Western Australian state government at the time, so it did not proceed.



Fig. 2: Nullarbor karst plain and the Great Southern Scarp - thought to be the world's longest escarpment - where 90-metre-high sea cliffs meet the Southern Ocean in the Great Australian Bight. *Photo: Bronwen and Stefan Eberhard*



Fig. 3: The Nullarbor Plain is famous for its giant dolines or 'sinkholes' which are formed by collapse of the limestone into enormous, flooded cave conduits which snake their way through the aquifer which lies ~ 90 meters below the surface. The collapse dolines, which are few and far between, are small windows into segments of the enormous underground river systems which carry ancient groundwater hundreds of kilometers through the limestone aquifer to the Southern Ocean. This doline is 80 meters in diameter: note the vehicle for scale. The integrity and unspoiled intactness of this fragile limestone landscape and world-class cave system is threatened by the proposed Western 'Green' Energy Hub. *Photo: Bronwen & Stefan Eberhard*



Fig. 4: Abrakurrie Cave. This world-class cave system is threatened by a colossal hydrogen / ammonia energy development proposed to be built only a few kilometres away. *Photo: Stefan & Bronwen Eberhard*



Fig. 5: Weebubbie Cave. Beneath the surface of the Nullarbor Plain there is a vast, salty, limestone aquifer which drains into the Southern Ocean through an immense and intricate cave system. *Photo: Stefan & Bronwen Eberhard*



Fig. 6: The Nullarbor's cave minerals and speleothems constitute a globally unique archive extending back into 'deep time', enabling the reconstruction of climates over the last 10 million years, and offering a unique analogue for understanding future climate change under greenhouse conditions.[3] *Photo: Stefan Eberhard*



Fig. 7: The Nullarbor caves are a treasure trove of well-preserved remains of extinct vertebrates spanning the Early and Middle Pleistocene, and much more recently, providing an invaluable record of vertebrate evolution and extinction which is under-represented in Australian cave deposits, including the World Heritage listed Australian Fossil Mammals Sites (Riversleigh/Naracoorte). Important Nullarbor discoveries include a nearly complete skeleton of the 'marsupial lion' (*Thylacoleo carnifex*). *Photo: Ken Boland*



Fig. 8: The Nullarbor karst contains rare and endemic subterranean species that have adapted and evolved in the karst, and which cannot survive on the surface. Several species are listed as rare or threatened under Australian legislation. This blind Nullarbor amphipod, *Nurina poulteri*, found only in Nullarbor groundwater. *Photo: Stefan Eberhard*

In the three decades since the 1992 report was submitted to the Australian Government, there has been much significant research published both nationally and internationally.[4] Expert cave and karst scientists around the globe have questioned why Australia has not yet proceeded with a World Heritage nomination for the Nullarbor Plain. The IUCN made special mention of the cave systems of the Nullarbor in a 2008 report on potential World Heritage caves and karst, emphasising that karst World Heritage sites are poorly represented in arid and semiarid environments such as the Nullarbor.[5]

Despite the growing body of scientific evidence compiled over the last 35 years, World Heritage nomination has stalled, at least on the WA side of the Nullarbor. Meanwhile over the intervening decades, around one-third of the karst on the SA side of the Nullarbor has been accorded a high level of protection in national parks and marine reserves (Fig. 9). A cogent case for protection also applies to the two-thirds portion of the Nullarbor karst located in WA, which harbours most of the outstanding individual karst features including Abrakurrie Cave (Fig. 4), and Weebubbie Cave (Fig. 5) for example.[4]

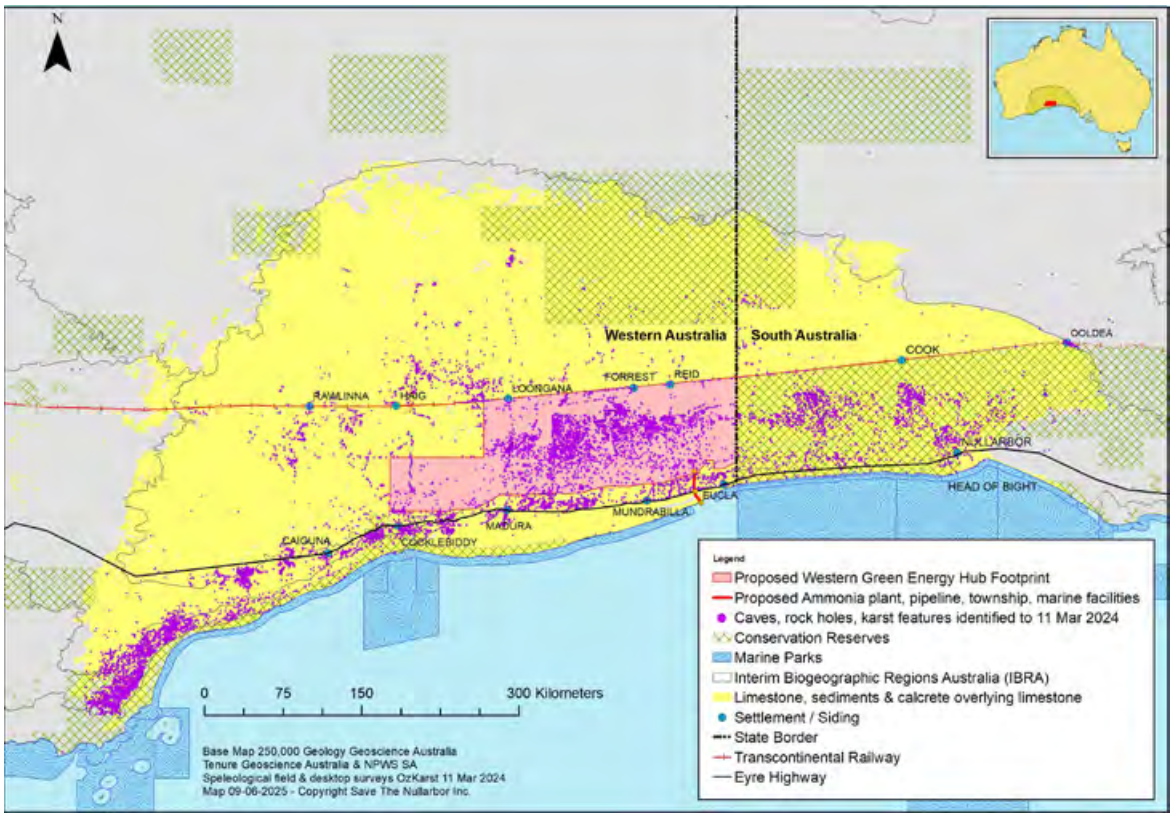


Fig. 9: Nullarbor limestone region (yellow), known caves and karst features (purple dots), and the proposed WGEH development envelope (pink shading). Note the high density of significant caves and karst features inside the energy hub envelope, its abutment to the Nullarbor National Park / Wilderness Protection Area in South Australia, and the aberrant interruption in the marine reserve system near Eucla, where the WGEH developer proposes to a desalination plant and international shipping port. Map: Save The Nullarbor Inc.

More recently, in 2022, the SA state Labor government committed to supporting a World Heritage nomination for their side of the Nullarbor and Great Australian Bight.[6] Ironically, around the same time, the WA state Labor government announced its support for the proposed colossal hydrogen project on the WA side of the Nullarbor.

Driven by a consortium of overseas corporations and investment, the Western 'Green' Energy Hub (WGEH), proposes to be the world's largest renewable energy project. The 70 GW pa renewables-powered hydrogen and ammonia production and export venture propose ~3,000 wind turbines and ~60 million solar panels sprawled across more than 22,000 square kilometres of fragile karst landscape (Fig. 10).

The proposal includes a new marine port and town for ~8,000 people, desalination plant, ammonia plant and storage tanks, construction workshops, ~35 hydrolyser plants, quarries, and thousands of kilometres of roads, power lines and pipelines (Fig. 11).[7]

Controversially, the proposed industrial envelope of the WGEH sits atop the central portion of the Nullarbor karst, a region containing the highest density of recorded karst features, including multiple highly significant caves with rare and endemic cave species, speleothems, subfossil bones, and cultural heritage values (Fig. 9). The development envelope contains more than 4,500 karst features, includ-

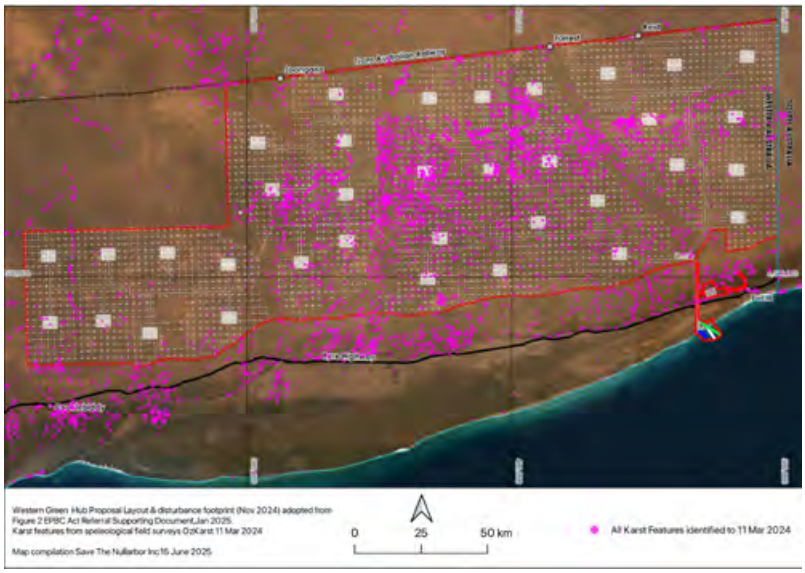


Fig. 10: Western 'Green' Energy Hub proposed indicative infrastructure layout for ~3,000 wind turbines and ~35 hydrolyser plants with thousands of kilometres of roads, power lines, and pipelines. The pink dots are more than 4500 karst features, including over 400 caves, over 500 rock holes, over 1900 blowholes and over 1470 dolines identified to date (2024) inside the project envelope. Map: compiled by Save The Nullarbor Inc.

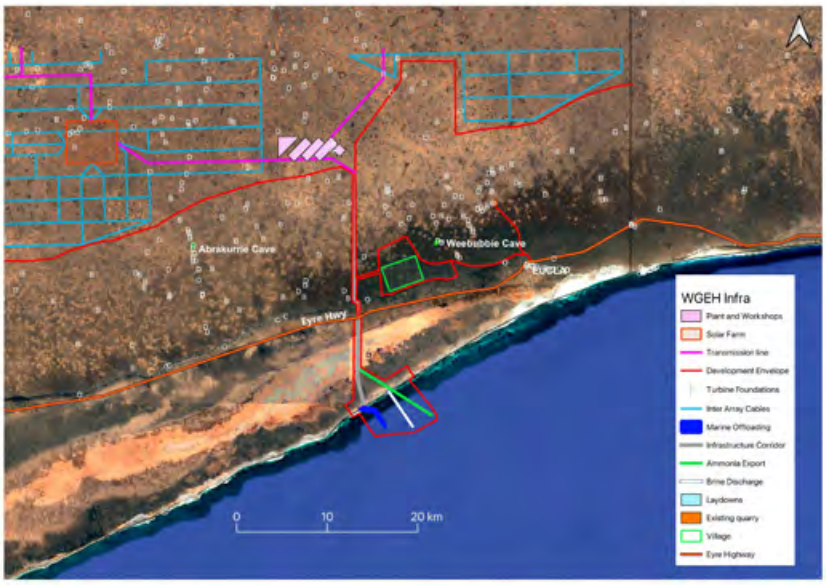


Fig. 11: Proposed WGEH infrastructure near Eucla and known karst features: blowhole (B), cave (C), doline (D), overhang (O), rock hole (R). The proposed town of 8000 people (green rectangle) is located within 3 km of Weebubbie Cave, and the proposed ammonia plant and storage facility (pink) lies about 13 km up-gradient in the aquifer from both the Abrakurrie and Weebubbie cave drainage systems. *Map: Save The Nullarbor Inc. from cited sources 2024*

ing over 400 caves, over 500 rock holes, over 1900 blowholes and over 1470 dolines (Fig. 10).[3]

If the WGEH development is allowed to go-ahead it will impact a vast area of fragile karst landscape, soils, vegetation, caves, Aboriginal cultural heritage, underground ecosystems and connected marine ecosystems. Even if WGEH infrastructure could be located to avoid the thousands of known karst features, there would be cumulative damage done to landscape, soils, vegetation, caves, dolines, blowholes, rock holes and cultural sites over ensuing decades due to the indirect impacts of a huge increase in vehicles and visitation by several thousand more people living in the area. These insidious indirect impacts would not be confined to the project envelope and would extend across the Nullarbor region into neighbouring national parks and the Nullarbor Wilderness Protection Area in SA (Fig. 9).

The WGEH venture is driven by two overseas corporations - InterContinental Energy (ICE: 51%) and CWP Global (39%) - touting equity partnership with Native Title Holders.[8] Mirning Green Energy Limited (MGEL, 10%) is a commercial subsidiary of the Western Australia Mirning People Aboriginal Corporation. Investment firms involved with ICE and CWP include Government of Singapore Investment Corporation (GIC), Hy24 (France) and Copenhagen Infrastructure Partners (CIP).

The WGEH has been the topic of extensive Australian media coverage amid growing public outrage and opposition to WGEH's proposal to industrialise and urbanise the Nullarbor Plain, an iconic wild place to many Australians.[9] Of more than 1,000 renewable energy projects proposed or underway in Australia, the WGEH has been identified among the top five most contentious.[9] While claiming to uphold highest standards in sustainable development, environmental, social and governance (ESG), the European and Asian investment firms (Hy24, CIP, GIC) backing the WGEH are exposing their shareholders to significant sustainability risk and serious damage to their ESG reputation.

The financial viability of the WGEH is heavily dependent on Australian Federal Labor government subsidies, and thus funded by Australian taxpayers, however, this energy project is not for the Australian electricity grid. Rather, WGEH plans to produce hydrogen and ammonia for export to South Korea. Not surprisingly, such taxpayer funded projects are widely unpopular with Australians.[9]

The WGEH is located within the WA local government Shire of Dundas, a vast area of 93,000 square kilometres with a population of less than 700 people. The Shire Council has expressed serious concerns about the environmental impacts of the WGEH and the strain that would be placed on service delivery by the projected more than ten-fold population increase, such as waste management, provision of health, emergency and education services, and law enforcement. The Shire minutes, March 2025, state: "The Project's heavy reliance on federal subsidies, potential strain on local infrastructure, and lack of financial safeguards create significant financial risks…The magnitude of this Project exceeds the Shire's financial and operational capacity, making long-term economic risks unpredictable." [10]

Over the past two years Australian and internationally renowned karst scientists have repeatedly called on the Australian Government to protect the Nullarbor region and nominate it for the World Heritage List. [11] More than 23,000 people have signed a petition opposing the location of the WGEH on the Nullarbor karst.[12] And, juxtaposing WGEH's corporate assertions of "Walking with the Mirning People", there is a growing groundswell of Indigenous community discontent and division, most notably in South Australia where many Mirning People currently live. Mirning Traditional Owners and Custodians have

ancient cultural obligations to protect all Mirning - Nullarbor Country, which long predates the colonial state border between South Australia and Western Australia (Fig. 12). There are Mirning Elders, Mirning People and Mirning descendents who are strongly opposed to the WGEH and have not given their Free, Prior and Informed Consent (FPIC) for the development.

More broadly, while acknowledging that Australia needs new decarbonised energy developments to combat global climate change and meet its international obligations, there is growing public opposition to the destruction of Australian environments to make way for large-scale renewables projects in nature hotspot areas. New energy projects, whether wind and solar based, hydro or nuclear, need to be rigorously evaluated for their environmental, social, and economic impacts, to ensure that they do not damage, disfigure, or destroy places with Outstanding Universal Values. What is needed at a state and federal level is a process for evaluating lands for renewable energy projects, so that any project does not cut across natural and cultural heritage values.

Australia, as a signatory to the UNESCO World Heritage Convention, has a legal obligation to identify and protect areas of Outstanding Universal Value. Article 3 of the UNESCO World Heritage Convention requires Australia to identify and delineate a site with universal values like the Nullarbor, for its cultural and natural values, and to protect it.[13] This obligation does not hinge on waiting until the Nullarbor is listed as World Heritage. Allowing any damage to the Nullarbor's outstanding natural and cultural values would therefore be a breach of Australia's legal responsibilities and obligations under the Convention.[13]

By May 2025 the WGEH proposal was being assessed under two separate processes – one under the environmental laws of Western Australia, and the other under the Australian government's national environment laws (the EPBC Act). Under both state and federal processes, the WGEH proponents have used the available information quite selectively and have failed to disclose the very real heritage significance of the Nullarbor Plain karst.[4] More alarmingly, the Australian Minister for Environment has so far disregarded the strident calls made by Nullarbor expert scientists, thus abrogating responsibility for protecting the Nullarbor's heritage values.[11]

By the end of 2026 the WGEH proponents will be submitting their environmental review documents to the state and federal governments for the next stage of assessment. During 2027 there will be a 10-week period for public review and submissions. The WA Environmental Protection Authority will issue their assessment report to the WA Environment Minister in 2028.[7] Federal government assessment under the EPBC Act will occur in a parallel process. Ironically these processes do not guarantee protection of the Nullarbor's heritage values. This is because Australia's nature protection laws have been shown to be 'broken', not fit for purpose, and long overdue for reform.[14]



Fig. 12: These ochre hand stencils in a Nullarbor cave convey a powerful and poignant story of Mirning Peoples co-existence with Nullarbor karst Country spanning at least 40,000 years. Photo: Stefan & Bronwen Eberhard

The proponent is expected to make a financial investment decision in 2029.

The Nullarbor and Great Australian Bight are of World Heritage significance and must be designated as 'no-go' zones for big industry. We are urgently appealing to World Heritage Watch, the UNESCO World Heritage Committee, and the international community to do all in your power to help save the Nullarbor from industrialisation, and to protect its Outstanding Universal Values.

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Annex

The Authors



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Pelika Andrade is a native Hawaiian born and raised on the island of Kaua'i. She is an extension agent for the University of Hawaii Sea Grant College Program, founder and the Executive Director of Nā Maka Onaona, a Hawaii based non-profit, and also the current co-chair of the Papahānaumokuākea Native Hawaiian Cultural Working Group. She has a long history working with Hawaii communities throughout the entire archipelago as a community member, sailor, voyager, cultural practitioner and researcher.
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ARRC Task Force

One of the six commissions of the International Union for the Conservation of Nature (IUCN) is the Species Survival Commission (SSC), which comprises more than 160 Specialist Groups that focus on different species and conservation issues, one of them being the Primate Specialist Group (PSG). The PSG has a Section on Great Apes (SGA) dedicated to orangutans, chimpanzees, gorillas, and bonobos. The more than 150 members of the SGA work in a number of groups, and one of them, the ARRC (Avoid, Reduce, Restore, and Conserve) Task Force, deals with the major threats to apes from large-scale development projects. It was launched in 2016 with the goal of ensuring that avoidance, reduction, and restoration measures are put in place by large-scale development projects to address impacts on great apes and their habitat, and that additional measures are taken to contribute positively to their conservation.
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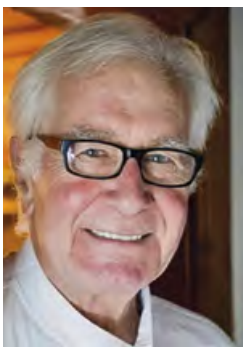
Houda Ben Younes is a Tunisian architect and Cultural Heritage Professional. She holds a PhD in Architecture from the National School of Architecture and Urban Planning of Tunis and a master's degree in Architecture, Landscape, and Archaeology from Sapienza University of Rome. She played a key role in the successful UNESCO inscription of Djerba's serial property, developing the nomination justification and conducting comparative analyses with sites across Africa, the Arab world, and the Mediterranean. As a member of the Djerba WH Committee, she actively volunteers in preparing project proposals and securing funding to safeguard and revitalize the serial property's heritage attributes. Previously, she served as a consultant at ICCROM-Sharjah on initiatives related to Arab historic cities and climate change. She is currently a Cultural Heritage Consultant at Alteradvise (Dubai, UAE).
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Ibrahim Canbulat (76) is a conservation architect, hotelier, cook and writer with a Masters of Architecture. In 1972, he worked in the team that designed the Gaziantep Campus Plan Faculty of Architecture. He has held various positions at the Department of Architecture of the Middle East Technical University (1973-1982) and at Karabük University. From 1992-2006 he worked as an independent consultant in Turkey's transportation, automotive and energy sectors. Since 2006, he has been a hotelier in the mansions which he restored in Safranbolu. He was granted an award for Best Conservation and Revitalization Project in 2006 by the Turkey Chamber of Architects for the restoration of the Macunağası İzzet Efendi House. and for Best Kitchen in the Black-Sea Region of Turkey in 2015 by the Government of Konya. He continues to publish about Ottoman Houses and Turkish cuisine.
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Juanjo Carmona



Juanjo Carmona has been a lawyer and environmental consultant since 1999. In 1996, he started volunteering in Doñana through WWF Spain, so he lived through one of its blackest moments, the Aznalcóllar mining catastrophe. In 2001, he was hired for WWF's Doñana office, located in Hinojos, where he lives. Since then he has been working to conserve Doñana in close collaboration with local communities, NGOs, businessmen, farmers and administrations. When talking about Doñana and its OUV, its beaches, lagoons, marshes, forests, dunes, lynx or imperial eagles, for him it is talking about his home and people.

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Jimmy Cordwell has a BA.Hons in Environmental Science from the University of Tasmania, specialising in dendro-chronology and investigating the relationships some of the oldest trees on Earth are having with a changing climate. He is a Wilderness Campaigner with the Tasmanian branch of the Wilderness Society, a non-government organization that has led conservation campaigns in Lutruwita/Tasmania and across Australia since 1976. A wilderness tragic, Jimmy has worked in conservation roles across government, private, and NGO sectors, and spends his spare time bushwalking and photographing the depths of his iconic backyard – the spectacular Tasmanian Wilderness World Heritage Area.

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Defensa Ambiental del Noroeste

Defensa Ambiental del Noroeste (www.dan.org.mx) is a civil society organization dedicated to promoting the defense of nature and environmental human rights through law in the northwest region of Mexico. We work to support a just energy transition and climate justice, conserve wildlife and protected natural areas, secure the rule of law and environmental rights, and safeguard oceans and coasts, among other activities. Our efforts focus on protecting the Gulf of California´s unique characteristics and the communities that depend on them, including participation in the 2010 UNESCO-IUCN-Ramsar petition for Cabo Pulmo.

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Architect, Master in Environmental Planning at the University of California-Berkeley, PhD in Environmental Structures, with distinction, at the Faculty of Architecture and Urbanism at the University of São Paulo-USP, were was a teacher for 40 years. Program Vice-coordinator of Amazonia in Transformation at the Institute for Advanced Studies at USP, is primarily responsible for the creation of more tha a hundred protected areas at the states, national and international level, including the recognition of the Serra do Mar and the Atlantic Forest as a Biosphere Reserve and for the listing of several World Heritage Brazilian Natural sites. Former Special Advisor for the Director of the World Heritage Center at UNESCO, in Paris and author of books and articles in forests conservation. Since 2021, Ze Pedro has been World Heritage Watch's representative in Brazil.

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Deutsche Umwelthilfe

Deutsche Umwelthilfe e.V. (Environmental Action Germany) is a politically independent non-profit environmental and consumer protection organization that was founded in 1975. Its work covers mainly climate protection and marine conservation, and it is active primarily at the national and European level. DUH's Energy & Climate Protection Department has an open climate case in court against Germany's biggest oil and gas company, Wintershall Dea, since October 2021.

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Wiwik Dharmiasih (38) is a lecturer at the Department of International Relations, Universitas Udayana, in Bali, Indonesia. She provided social and legal analysis for the World Heritage nomination of the Balinese irrigation system, *subak*, (2010-2011) and was the Coordinator for Program and Planning Unit at the Governing Assembly for Bali's Cultural Heritage (2012). She was involved in the establishment of *Forum Pekaseh Catur Angga Batukau* and helped design the monitoring and evaluation system of the management of World Heritage property in Bali under the Subak Research Center, Universitas Udayana (2014). She is currently active in supporting community participation and youth involvement in the management of Bali's Cultural Landscape. She recently facilitated a photovoices community engagement initiative in Subak Jatiluwih to elicit local perspectives on the future management of the site.

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Stefan Eberhard is a scientist, explorer, and photographer. He completed a zoology degree at the University of Tasmania and PhD at Murdoch University, Western Australia. He is the founding Director of Subterranean Ecology Pty Ltd,, an Adjunct Senior Lecturer at Adelaide University, Adjunct Affiliate at the University of New South Wales, past Honorary Associate with the Western Australian Museum, and Fellow of the Australasian Cave and Karst Management Association. Stefan has been exploring, diving and researching the Nullarbor caves for more than 40 years. In 2024 Stefan and his wife Bronwen Eberhard founded Save The Nullarbor Inc, a not-for-profit group dedicated to raising awareness about the natural, scientific and cultural values of the Nullarbor Plain and the looming threats to the integrity of its extraordinary caves of World Heritage significance.
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Born in Portugal, Kate originally trained in horticulture in the UK. She changed career following a successful campaign for an award winning flexible bus scheme, and subsequently retrained to practice professionally as a transport planner. She has supported the Stonehenge Alliance since its inception 30 years ago and represents Friends of the Earth South West on its Committee.



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Teresa Gil is a Spanish biologist with 20 years of professional experience in Natura 2000-Protected Areas management and habitats and flora conservation. Since April 2019, she has been the Head of the WWF-Spain Freshwater Programme. WWF-Spain's origin is closely linked to Doñana. Over the last 50 years, WWF has been fighting to ensure the preservation of its OUV, trying to stop the illegal theft of water that is degrading outstanding aquatic ecosystems like Doñana National Park, and promoting marshland restoration in the Guadalquivir Estuary as a way to restore some of the losses of the past and giving a green economic alternative to intensive agriculture and tourism. Teresa is a member of several NGOs like WWF, SEO Birdlife, Territorios Vivos and SEBICOP. She is member of the IUCN WCPA (World Commission on Protected Areas) and EAGL-Spain.
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GOB Menorca

GOB (Grup Balear d'Ornitologia i Defensa de la Naturalesa) is a non profit making ecological association, which has been working in the Balearic Islands since 1973. The branch which works in Menorca was created in 1977 and now has more than 1,200 members. Its primary object is to contribute to the achievement of a sustainable economy, which by implication necessitates making human activities compatible with environmental values. GOB promotes the defence of environmental values and the balance between human activities and nature conservation. Our activities try to cover as much as possible this principle. To achieve this, we work in different areas of action: environmental education, environmental policy, and biodiversity conservation.
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Elke Greiff Gossen was born in 1961. She studied Computer Science at the University of Dortmund. Elke operates the website LoreleyInfo, an information portal for the World Heritage Upper Middle Rhine Valley. She is a member of the "BI Rheinpassagen". This citizens' initiative promotes the preservation of the World Heritage Upper Middle Rhine Valley. Elke focuses on the fields of optimizing ferry services, noise reduction, conservation of nature and climate-friendly infrastructures. She is responsible for the online presence of the "BI Rheinpassagen".
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Shin-ichi Hanawa is a veteran environmental conservationist. He serves an advisory role for various environmental NGOs and communities. Trained at Tohoku University and Tokyo University of Agriculture and Technology, he specializes in ornithology, ecology, and environmental conservation. Shin-ichi worked for the Wild Bird Society of Japan, conducting extensive surveys across Japan. He also worked for WWF-Japan, planning and implementing conservation measures for endangered environments. His commitment to protecting the environment of Okinawa has been widely acknowledged. He played a crucial role in IUCN's adoption of recommendations (2000 and 2004) that called for the inscription of the Yambaru Forest as a World Natural Heritage Site.
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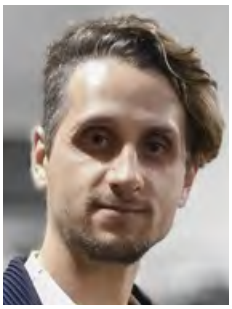
Alice Hardinge has been active in environmental advocacy for a decade. She has been a fundraiser and campaigner for the Wilderness Society Australia from 2019- 2022 before she joined The Wilderness Society Tasmania in 2023 and serves the organization now as a campaigns manager. The Wilderness Society is an independent, community-based, not-for-profit environmental advocacy organisation. Our vision is to transform Australia into a society that protects, respects and connects with the natural world that sustains us. We are committed to protecting, promoting and restoring wilderness across the continent for the survival and ongoing evolution of life on Earth.
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Catalin Ivancov is a researcher specialising in archaeological heritage management in Southeast Asia, with particular focus on Indonesia. With a Masters in World Heritage Studies (B-TU), he is a member of ICOMOS Indonesia National Committe, active member of the International Committee on Archaeological Heritage Management (ICAHM), and the OCD/RBA ICOMOS Working Group on Rights-Based Approaches in Heritage.. He has followed closely the conservation and management trajectory of the Borobudur Temple Compounds World Heritage Site and has been in Contact with heritage professionals, conservation experts, and civil society organisations engaged with the site.
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Sharif Jamil



Sharif Jamil is an internationally recognized leader and activist in the global environmental movement. For more than two decades he has been organizing civic action for environmental justice in Bangladesh. He is a Council Member of Waterkeeper Alliance and the Coordinator of Waterkeepers Bangladesh. Sharif is currently serving as the General Secretary of the civil society initiative, Bangladesh Poribesh Andolon (BAPA). He was declared a Waterkeeper Warrior in the world on the eve of the 20th anniversary of the organization in 2019. He has been organizing grassroots movements against dirty industries and promoting global campaign against climate change. He is a founding member of the National Committee for Saving the Sundarbans (NCSS) and working in the global campaign for the Sundarbans World Heritage Site and promoting renewable energy in Bangladesh.
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Sultana Kamal



Sultana Kamal is the Convener of the National Committee for Saving the Sundarbans (NCSS), a coalition of more than 50 civil society and non-governmental organizations of Bangladesh having shared interest in the environment, is concerned that the Government of Bangladesh continues to disregard the 2017 decision of the World Heritage Committee (WHC) 41COM 7B.25 to protect the outstanding universal values (OUV) of the Sundarbans Bangladesh World Heritage site.
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Masami Mel Kawamura



Masami Mel Kawamura is the Director of the Informed Public Project (IPP) in Okinawa, Japan. IPP engages in research and advocacy regarding environmental contamination related to U.S. military bases in Okinawa. Her research utilizing the Freedom of Information Act has helped reveal the contamination at former and present U.S. military bases in Okinawa, including the UNESCO World Natural Heritage site, Yambaru Forest. Masami holds a Ph.D. in International Sociology from Hitotsubashi University and teaches as an adjunct lecturer at the University of the Ryukyus and Okinawa International University. She is a member of the IUCN Commission on Ecosystem Management.
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Kaipulaumakaniolono Keala



Kaipulaumakaniolono Keala is from Kahaluʻu, Oʻahu. Kaipu is a composer, playwright, education, and cultural practioner. He is an assistant professor of Hawaiian Studies at the University of Hawaiʻi at Mānoa, and a member of the leadership team of the Papahānaumokuākea Native Hawaiian Cultural Working Group.
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Kekuewa Kikiloi



Kekuewa Kikiloi is from Heʻeia Oʻahu. His educational background is primarily in Hawaiian Studies and Anthropology, where his research has been focused on understanding the nature and complexity of traditional Hawaiian society and bringing this knowledge to bear on cultural revitalization efforts today. Over the past 20 years he has worked in cultural resource management and research in Hawaiʻi. He is an associate professor of Hawaiian Studies at the University of Hawaʻi at Mānoa, and the co-chair of the Papahānaumokuākea Native Hawaiian Cultural Working Group.
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Entela Koja



Entela Koja is an Albanian-Canadian architect and urban planner with over 30 years of experience. She graduated from the Polytechnic University of Tirana and Urban/City Planning at the University of Toronto, Canada. Throughout her career in Albania and Canada, she has developed and contributed to more than 500 projects in the fields of architecture, urban regeneration, infrastructure, tourism development, public space, and landscape design, collaborating and with the EIB, EBRD, GIZ, and others. She has also participated in national international conferences and professional forums. In recent years, her work has increasingly included civic activism, media engagement, environmental protection, and advocacy for the preservation of historic urban sites in Albania, particularly in relation to the Durrës Amphitheatre and the TID Durrës redevelopment project.
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Evelina Kravchenko



Evelina Kravchenko is Senior research fellow at the Institute of Archaeology of the National Academy of Sciences of Ukraine. She has a diploma of specialist in history from the Ivan Franko Lviv National University (1998), a master degree from the National University of the Kyiv-Mohyla Academy (2002) and a PhD in archaeology (Candidate in historical science) from the Institute of Archaeology of the National Academy of Sciences of Ukraine (2008). She conducted her own excavations and worked in several international projects in Crimea from 2001 to 2014, such as the project of the Institute of Classical Archaeology of Texas University in Chersonesos. For the last 10 years she has worked in Kyiv with material of her previous excavation, other material from Ukrainian archaeological sites, and monitors the archaeological heritage in occupied Crimea.
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Martin Lenk



Martin Lenk holds a degree in geography with minors in landscape ecology and Slavic studies from the University of Greifswald, Germany. He studied abroad in Russia, Kazakhstan, and Spain, and contributed to the World Heritage nomination of "Saryarka – Steppe and Lakes of Northern Kazakhstan." From 2018 to 2022, he coordinated the World Heritage nomination of Hin Nam No National Park at the Lao PDR's Ministry of Information, Culture, and Tourism. He is a member of the German Society for Nature Conservation and has served on the board of World Heritage Watch since early 2025.
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J. Hauʻoli Lorenzo-Elarco



J. Hauʻoli Lorenzo-Elarco is from Waimea, Hawaiʻi. Hauʻoli sits on the leadership board as the coordinator of the Papahānaumokuākea Native Hawaiian Cultural Working Group (CWG), and serves as the chair of the Nomenclature Subcommittee. He is also an Assistant Professor of Hawaiian language at Honolulu Community College.
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Kenika Lorenzo-Elarco



Kenika Lorenzo-Elarco is a Kanaka ʻŌiwi educator and scholar from Waialua, Oʻahu dedicated to advancing Indigenous knowledge systems, education, and self-determination across the paeʻāina. He serves as the Community Engagement Manager at the W. M. Keck Observsatory and a Junior Specialist faculty at the University of Hawaiʻi at Mānoa. Kenika is also a member of the Papahānaumokuākea Native Hawaiian Cultural Working Group (CWG).
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Maki Kvitsiani



Maki Kvitsiani is an independent researcher with a background in art history. She holds a Master's degree from the Tbilisi State Academy of Arts and has worked in the field of cultural heritage with organizations such as Blue Shield Georgia and the National Trust of Georgia. She also has experience working in museums at the Tbilisi Museums Union. In addition, she has worked as a guide for cultural and adventure tours. Her interests focus on urban heritage, mountain settlements, and the challenges they face today.
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Maasai International Solidarity Alliance

The violent evictions of June 2022 in Loliondo and the government's targeted campaign against the Maasai in Ngorongoro from 2021 have prompted us to reinforce the coordination of our local and global efforts. We oppose the forced relocation of the Maasai of Ngorongoro. We reject the weaponisation of social services against the Maasai. All this is meant to force our people to leave the land and make space for tourists. We bring together international faith-based organisations, human rights organisations, international aid and development organisations, as well as local voices, grassroots movements, individual activists, researchers and lawyers representing the Maasai in several land cases. Our alliance includes Maasai activists and lawyers representing Maasai values and defending Maasai rights, as well as international allies from various continents.
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Katie Mastriano



Katie Mastriano has a BA in International Affairs and French from Skidmore College centering her studies in francophone decolonization, development, and environmental science. Her work analyzes environmental, political, cultural, and economic implications with a careful attention to historical significance. Her research primarily focuses on development in Senegal and currently collaborates with Action Solidaire International, based in Dakar.
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Akino Miyagi



Akino Miyagi is an entomologist and independent researcher specializing in the study of butterflies. She worked at the Uruma City Sea Cultural Museum in Okinawa, where she helped raise public awareness about the lives of insects in the Yambaru Forest. After parts of the U.S. military's Northern Training Area in the Yambaru Forest were returned to Japan in late 2016, Akino began surveying the impacts of the U.S. military training area on the forest. Her discovery of the U.S. military's waste and land contamination in the former training areas, now incorporated into the World Natural Heritage site, has prompted a public call for the Japanese and U.S. governments to clean up.
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Ilias Monacholias



I was born in 1955 in Elefsina and I still live there. Before my studies as a Civil Engineer, I grew up spending much time in my father's bookshop. He transmitted to me his love for the Archaeological site and the great history of our small town. It is not irrelevant that I set up a publishing house in 2008. I have already published 16 books regarding Eleusinian history (www.cyceon-tales.gr). When I was Vice Mayor of Elefsina (1982 – 1986) we organized the International Conference for te Salvation of Elefsina and its Antiquities. In 2014 I set up the Friends of Elefsina NPCP and I ran it as an Administrator. Since 2024 I am the Administrator of Elefsina – Arts and Culture NPCP. I worked for decades as a top manager of IT and Energy Companies and I am working now as a Renewable Energy Senior Advisor.

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Kanoe Morishige



Kanoe Morishige has spent nearly 20 years weaving ʻŌiwi (Native Hawaiian) knowledge and western science with local communities to build kilo (stewards) dedicated to ʻĀina Momona, healthy and thriving communities. She co-leads intertidal monitoring across Hawaiʻi, including Papahānaumokuākea Marine National Monument, to support adaptive management of intertidal ecosystems as biocultural systems of people and place. She is an assistant professor of Hawaiian Studies at the University of Hawaiʻi at Mānoa, and a member of the leadership team of the Papahānaumokuākea Native Hawaiian Cultural Working Group.

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Alejandro Olivera



Alejandro Olivera is the Mexico Representative of the Center for Biological Diversity. He works to conserve Mexican wildlife, including highly endangered vaquita porpoises and loggerhead sea turtles. He is a marine biologist from the University of Baja California Sur and has a master's degree in the use, management and preservation of natural resources as well as a diploma in environmental law. He comes to the Center after years of work at the Mexican Center for Environmental Law (Cemda) and Greenpeace México. He is a petitioner for "in danger" designation of two World Heritage Sites in Mexico: The Islands and Protected Areas of the Gulf of California and Reserva de la Biósfera El Pinacate y Gran Desierto de Altar.

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Alexander Kalauokalani Peʻa

Alexander Kalauokalani Peʻa is a Hilo High School graduate, multilingual researcher, guest lecturer, and advocate for the continuity of the Hawaiian Kingdom under international law. Fluent in five languages, he studied under David Keanu Sai and Kamuela Mawae. Peʻa has lectured at the University of Nevada, Reno on Hawaiian state continuity, treaty law, and international law. A founding member of Hui Aloha ʻĀina under Keokani Marciel, he trained in parliamentary procedure and Hawaiian political traditions. He holds an MBA, BA, and AA in finance and East Asian studies. Over the last decade, he has published more than 22,000 educational social media posts on Hawaiian history, Mauna Kea, and Hawaiian national consciousness. He also developed a searchable system for the Kūʻē Petitions to help Hawaiian families locate their ancestors' signatures.

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Jen Pelz



Jen serves as Water Advocacy Director at the Grand Canyon Trust. She is a lover of desert landscapes and the water and people that bring them to life. She grew up in New Mexico and earned a B.A. in biology at the University of Northern Colorado and a J.D. in environmental and natural resource law at the University of Oregon. She has two decades of experience advocating to safeguard flowing rivers and clean water for people and the environment in Arizona, Colorado, and New Mexico.

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Amanda Podmore



As conservation co-director of the Grand Canyon Trust, Amanda Podmore oversees the Grand Canyon Program along with the Trust's water, energy, Arizona public lands, and GIS bodies of work. She has a B.A. in environmental policy from Colorado College and a masters in natural resource law from the University of Denver. She has advanced campaigns to protect Bears Ears, defend cultural landscapes from large-scale oil and gas development, and safeguard the Little Colorado River from unwanted dams.

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Herbert Rasinger



Herbert Rasinger has been the chairman of the Cityscape Protection Initiative (Initiative Stadtbildschutz), based in Vienna, Austria since 2015. He is active in cultural heritage site (last atelier of Gustav Klimt) and city protection matters (Wien Mitte, Vienna ice skating ring). He is a graduate of the Vienna Technical University and of a high school in Wilmington, Delaware, USA.
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Paul Reed

Based in Taos, New Mexico, Paul Reed has been a Preservation Archaeologist with Archaeology Southwest since 2001. In 2022, he and award-winning filmmaker David Wallace produced a short documentary film: *Protecting Chaco's 10-mile Zone* which was awarded a Rocky Mountain Southwest Chapter regional Emmy in 2023. His most recent writing is an edited book (with Gary M. Brown as co-editor) entitled *Aztec, Salmon, and the Pueblo Heartland of the Middle San Juan,* published in 2018. He also served as editor (and author of several chapters) on *Chaco's Northern Prodigies: Salmon, Aztec, and the Ascendancy of the Middle San Juan Region After AD 1100* (2008), editor and author of several chapters of the three-volume report *Thirty-Five Years of Archaeological Research at Salmon Ruins, New Mexico* (2006). His other books – *The Puebloan Society of Chaco Canyon* (2004) *and Foundations of Anasazi Culture* (2000) have explored the origins of Puebloan culture and Chaco Canyon.
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Amber Reimondo



Amber Reimondo is the Energy Director at the Grand Canyon Trust. She holds a master's degree in environmental science and policy from Northern Arizona University. Amber spent her early career working with conservative lawmakers and regulators on oil and gas-related environmental issues in Wyoming. She came to the Grand Canyon Trust in 2016 and has since worked with tribes, community leaders, and nonprofit partners to end uranium mining in the Grand Canyon region. In that time, Amber has testified before congressional committees twice and has had the great honor of working in support of the 13 tribes of the Grand Canyon Tribal Coalition. She has forged strong working relationships with impacted Indigenous community leaders who graciously teach her about their resilience and the challenges they face every day protecting their homelands, their communities, and their ways of life.
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Save Our Songlines

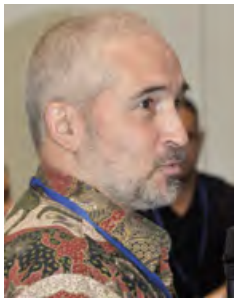
Save Our Songlines (SoS) is a group of independent Traditional Owners with ongoing cultural and spiritual connections to Murujuga and cultural responsibility for its protection. SoS' mission is to protect, practice and preserve culture at Murujuga for future generations. SoS advocates for greater protection of the Ngurra, including rock art, songlines, health, climate and culture from the impacts of inappropriate industrial development.
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Save the Tigris

The international campaign 'Save the Tigris' (www.savethetigris.org) is a network of over 15 civil society organisations from Iraq, Iran, Turkey, Syria and other countries with the aim to advocate for the preservation of heritage in the Tigris-Euphrates basin. Particularly, Save the Tigris has been advocating for the protection of the natural heritage of the marshlands in Iraq through advocacy with stakeholders, research and awareness activities. Through their campaign members Un Ponte Per and Humat Dijlah, Save the Tigris is also coordinating 'Sumereen', a major UNDP-supported project to develop the natural and cultural heritage of the Ahwar through the construction of infrastructure, training and livelihood support.
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Eugene Simonov

Eugene Simonov is an environmental activist and expert. He is the International Coordinator of the Rivers without Boundaries Coalition (RwB) focusing on North Eurasian transboundary rivers. He collaborated with the WWF Amur Program to curtail three hydropower projects and designed a methodology for basin-wide environmental impact assessments of hydropower and analysis of the role of hydropower in flood management. He also works with the trilateral "Dauria" International Protected Area and the Sino-Russian Expert Committee on Biodiversity and Protected Areas. Since 2012, RwB has campaigned on hydropower projects sponsored by the World Bank and China Exim Bank. Since 2016 Eugene has worked with the Green Silk Road Coalition that pushes for more accountability and environmental sustainability of China's Silk Road Economic Belt integration initiative.



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SOSOrinoco

The purpose of SOSOrinoco is to shed light on the existing body of work regarding the situation in the Amazonia and Orinoquia regions of Venezuela, to raise awareness of the tragedy that is occurring and to outline some urgent measures that need to be taken in order to halt the unfolding human and environmental disaster. SOSOrinoco is an advocacy group started in 2018 by a group of experts inside and outside of Venezuela. They have been working anonymously, concealing the names of team members and witnesses, due to the high risk of doing this type of research in Venezuela. Their commitment has been to document and create an in-depth diagnostic of the region south of the Orinoco River and to raise awareness about the tragedy that is occurring, as well as to outline urgent measures that need to be taken in order to halt this disaster.
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Nevin Soyukaya



Nevin Soyukaya graduated from Atatürk University, Department of Archeology. Between 1989 and 1994, she worked as the Culture and Art Director at the Diyarbakır Municipality. Between 1994 and 2013, she served as an Archaeologist and Museum Director at the Diyarbakır Museum. She served as the head of the Diyarbakır Castle and Hevsel Gardens Cultural Landscape Area Management during and after the UNESCO candidacy process. In 2017, she was dismissed from civil service by a decree-law. Simultaneously with her duties in the public sector, she participated in voluntary work and carried out projects in various NGOs, designating the cultural inventory of Mardin and Diyarbakır provinces. She has been running the Archive and Portal Project on Diyarbakır/Sur under the Diyarbakır Association for the Protection of Cultural and Natural Assets since 2018.
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Stop Kullave Pogradec

"Stop Kullave Pogradec" is an independent citizens' initiative established in response to concerns surrounding large-scale urban development projects proposed on the shoreline of Lake Ohrid in Pogradec, Albania. The group brings together local residents and concerned individuals advocating for transparency, environmental protection, preservation of public space, and respect for the cultural and ecological values of the Lake Ohrid World Heritage property.
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Wayan Subawa

Wayan Subawa (34) is a farmer in Subak Jatiluwih, Bali. He started learning to farm and helped in the rice fields since junior high school (around 2006-7) and began farming independently by practicing organic farming after graduating from college in 2015.

Yefta Sutrisno



Yefta Sutrisno (29) is a freelance researcher interested in social issues in Bali. He has been involved in Jatiluwih working with the local community since 2013. He is currently working on research project in Jatiluwih that is part of a multi-country study on "resiliency in indigenously engineered, yet vulnerable, rice farming landscapes."
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Tasos Tanoulas

Dr. Tasos Tanoulas is an architect who worked in the Greek Ministry of Culture from 1976-2016, at the Service for the Preservation of the Acropolis Monuments (1977-2010), and in charge of the Propylaia Restoration Project (1984-2010). After retirement, he was superintendent of the Restoration of the Propylaia South Wing (2013-2016). A member of Greek and international scientific institutions and committees, he published more than seventy articles in scholarly periodicals and volumes, on architectural history and theory from antiquity to date, and published several books on the Propylaia. He received the Europa Nostra Award for Conservation and the Europa Nostra Public Choice Award in 2013, as the leader of the Propylaia Restoration Project. In 2020, he founded the initiative Acropolis SOS.
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Manana Tevzadze



Manana Tevzadze is a cultural heritage specialist and former Chair of the Georgian National Committee of the Blue Shield (2012–2022). With a master's degree in World Heritage Studies from Brandenburg University of Technology Cottbus Senftenberg, she has 20 years of experience working in cultural heritage sector in Georgia and internationally. She is an assistant professor at Ilia State University in Tbilisi, Georgia, and has recently

consulted the UNESCO World Heritage Education Program on the revision of the "World Heritage in Young Hands" teacher's Kit. Manana serves as Secretary of ICOMOS Georgia since 2019 and has served on the board of Blue Shield International from 2017 to 2020.
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Klaus Thomas



Klaus Thomas (1948) is an MBA who has retired from the Federal Ministry of the Interior and is now the spokesperson for the Bürgerinitiative Rheinpassagen ("Rhine Transit Routes Citizens' Initiative") which works for the conservation of the landscape and culture of the Middle Rhine Valley. This includes various activities to fight against noise harassment from rail and road traffic in order to transmit this unique landscape unscathed to future generations.
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Günter Wippel



Günter Wippel holds a degree in economics and has worked on issues such as uranium mining and human rights since the 1980s. He was a co-organizer of the The World Uranium Hearing in Austria (1992) and has attended many conferences on the issue of uranium mining. In 2003, he co-founded a human-rights group, MENSCHENRECHTE 3000 e.V., connecting human-rights violations and environmental destruction. This NGO has also worked for many years on the rights of indigenous peoples. In 2008, he initiated the working group "uranium-network.org" and co-organized international conferences on the impacts of uranium mining in Bamako / Mali (2012), in Tanzania (2013) and in Johannesburg / South Africa (2015). The NGO works with communities affected or threatened by uranium mining worldwide, focusing most recently on countries in Africa.
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Hideki Yoshikawa



Hideki Yoshikawa is the Director of the Okinawa Environmental Justice Project (OEJP) in Okinawa, Japan. OEJP engages in research, advocacy, and lobbying to protect Okinawa's environment from the overwhelming presence of U.S. military bases in the region. Hideki was trained as an anthropologist at universities in the U.S. and Canada. For 15 years, he has been at the forefront of internationalizing Okinawa's military base-related environmental issues. His work has highlighted the controversial situations surrounding the UNESCO World Natural Heritage Yambaru Forest and the U.S. military's Northern Training Area adjacent to the World Heritage Site.
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Imogen Zethoven



Imogen Zethoven is director of Blue Ocean Consulting. She has 30-years of experience working to conserve nature on land and in the ocean through the development of public policy and environmental advocacy. She has worked for several NGOs in Australia, the USA and Germany including WWF, The Pew Charitable Trusts and the Australian Marine Conservation Society (AMCS) on matters such as marine park establishment, environmental law reform and climate change. She is currently advising AMCS on the Great Barrier Reef and World Heritage Committee advocacy. AMCS is the Australia's only national NGO dedicated solely to protecting Australia's ocean wildlife and ecosystems. AMCS was established in 1965 by a community of scientists and conservationists to protect the Great Barrier Reef.
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World Heritage Watch

World Heritage Watch is an independent non-governmental organization founded in 2014 and committed to the preservation of the UNESCO World Heritage worldwide. We keep watch that the World Heritage is not sacrificed to political compromises and economic interests. We support UNESCO in obtaining up-to-date, complete and accurate information about the situation of the World Heritage properties. And we help local people to protect their sites and to have a reasonable benefit from them. In UNESCO, recognition has now grown that the over 1000 World Heritage properties cannot be monitored, protected and sustainably managed without the active involvement of civil society.

Word Heritage Watch (WHW) is also a worldwide civil society network of more than 250 NGOs, indigenous peoples, individuals and local communities who contribute to the safeguarding of UNESCO World Heritage sites. We claim our rightful role in the global governance system of the UNESCO Word Heritage Convention, and we insist on our right to participate in the identification, interpretation, management and monitoring of World Heritage sites. We claim the right of local communities to know, understand, benefit from, maintain, enjoy and develop natural and cultural heritage, and we raise awareness in the general public about challenges the World Heritage faces from mismanagement, development pressures, climate change, overtourism and armed conflict.

Our goals

World Heritage Watch has the following objectives:

- To raise awareness about the importance of UNESCO World Heritage;
- To strengthen the role of civil society in the UNESCO World Heritage Convention;
- To support UNESCO in protecting and safeguarding World Heritage sites.

World Heritage Watch pursues these goals by

- Building a network and forum for the exchange of information and experience of its members;
- Supporting NGOs and local communities who work for their World Heritage sites;
- Helping to bring updated and detailed information relevant to the preservation of the World Heritage properties to the attention of governments and UNESCO;
- Informing the public about developments related to the World Heritage properties.

World Heritage Watch considers itself to be an enabling and facilitating platform providing support, coordination and communication for our global network of civil society actors who are committed to “their” World Heritage property and will notify us of dangers that threaten them. Our highest concern is the reliability of our information and the technical quality of our work.

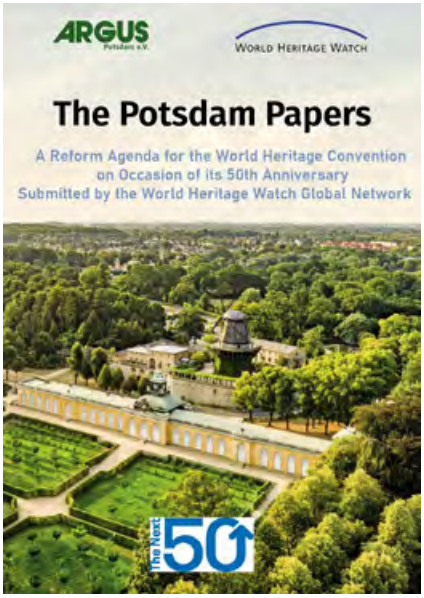
Please support our work

This report, like all our work, is made possible by the dedicated voluntary commitment of our network and team, for which we are deeply grateful. Please help us continue our work for World Heritage by making a generous donation.

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The Potsdam Papers

Our Roadmap for the Future of the World Heritage

Based on our collective experience and expertise, in 2021 the World Heritage Watch network undertook to evaluate the implementation of the World Heritage Convention, resulting in actionable proposals in 12 critical policy fields.

The publication examined challenges facing the World Heritage system and proposed reforms to strengthen its credibility, effectiveness, and ability to respond to contemporary threats.

The "Potsdam Papers" present the outcomes of an international consultation with leading World Heritage officials and were published in 2022 as World Heritage Watch's contribution to the 50th Anniversary of the Convention.

1. **Curbing the Politicization of the World Heritage Convention** – promoting to ensure transparent, evidence-based decision-making in the World Heritage Committee.
2. **Preventing the Devaluation of the World Heritage List** – addressing the rapid expansion of the List and safeguarding the meaning of Outstanding Universal Value.
3. **The Role and Rights of Civil Society** – strengthening the participation of NGOs, communities, and independent experts in World Heritage processes.
4. **Links with Other International Conventions** – improving coordination with environmental, human rights, biodiversity, and sustainable development frameworks.
5. **Nominations, Evaluations, Management and Monitoring** – enhancing the quality, consistency, and effectiveness of site management and oversight.
6. **Financing the World Heritage Convention** – exploring sustainable funding mechanisms for conservation, capacity-building, and monitoring.
7. **The Climate Crisis and World Heritage** – addressing climate change impacts on cultural and natural heritage and promoting adaptation measures.
8. **Tourism and World Heritage** – balancing conservation needs with tourism development through sustainable management approaches.
9. **Water Catchment Areas and World Heritage** – protecting sites from the impacts of dams, water diversion, and large-scale infrastructure projects.
10. **Managing Change in Cultural Landscapes** – ensuring that living heritage landscapes could evolve while retaining their heritage values.
11. **Buffer Zones and Site Boundaries** – strengthening legal and management frameworks for the protection of settings and surrounding areas.
12. **Sustainable Development and World Heritage** – integrating heritage conservation with social, economic, environmental, and community development objectives.

Many of the challenges identified continue to affect World Heritage sites but remain insufficiently addressed. At the same time, growing expectations of Indigenous peoples, young practitioners and site managers reinforce the urgency of its recommendations. The Potsdam Papers therefore remain a forward-looking agenda for ensuring the practicability of the World Heritage Convention in the decades ahead.

The 68-page brochure can be downloaded at https://world-heritage-watch.org/content/special-reports



Map of the properties covered in this volume

Produced with support from
Naturschutzbund Deutschland e.V. (NABU)

ISBN 978-3-00-087347-8