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To
Mr. Francesco Bandarin
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CC:
Mr. David Sheppard
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Re: Pirin National Park and World Heritage Site under Increasing Threat of Total Destruction

Dear Mr. Bandarin,

With extreme concern we would like to inform you that threats over Pirin National Park, a World Heritage Site /WHS/, continuously increase and threaten its existence and coherence. All this happens even though:

- Back in 2000 (8 years ago) Bulgarian Non-governmental organizations have already alerted the World Heritage Committee /WHC/ about the problem posed by construction of a ski zone in Pirin NP and within the World Heritage Site, still then requesting Pirin NP to be included in the List of World Heritage in Danger;
- Numerous follow-up letters and statements on the subject have been sent by Bulgarian NGOs and scientific institutes to WHC, to the institutions in Bulgaria and to the European Commission, and legal proceedings have been initiated;
- The current Management plan of Pirin National Park has been developed with the assistance of the Swiss Confederation and endorsed by the Bulgarian Government in 2004;
- Two UNESCO/WHC-IUCN missions have been held in 2002 and 2004;
- With UNESCO/WHC financing, a second nomination file has been developed for Pirin NP as a World Heritage Site, covering updated area limits and information about the site.

Unfortunately, the coalition of Bulgarian NGOs - *For the Nature in Bulgaria* established:

1. Continuing deterioration of the World Heritage Site and non-compliance with the World Heritage Convention of decisions taken by the Bulgarian Government, intrinsically a severe infringement of the aims and specifically of Article 4 of the World Heritage Convention. See Annex 1 – Brief Review of the Infringements of Pirin NP and WHS protection status in the period 1982-2008.
2. Multiple violations of the current management plan for Pirin National Park (2004) and other Bulgarian and European legislation effected with the implicit consent of or

permits issued by the Bulgarian institutions. See Annex 2 - Violations of Pirin NP Management plan in the period 2007-2008.

3. At a sitting held on 31 July, the Public Consultative Council of Pirin NP with the participation and support of Pirin NP Directorate, disregarding the votes of 4 NGOs, took a decision to recommend to the Minister of Environment and Water taking on steps for altering the park management plan. In essence, this means launching a procedure for development of a new management plan, which is to cover and legalize the infringements done hitherto in the ski zone of Bansko, as well as to set up new ski zones within the National Park and the World Heritage Site area. See Annex 3 - Indicative map of existing and proposed tourism (ski) zones in Pirin NP and WHS.
4. Total unwillingness of the Bulgarian Government and the Ministry of Environment and Water in particular to put an end to infringements in the Park and the World Heritage Site and to counteract further unsustainable development of contiguous areas, as confirmed by the withdrawal of the second Pirin NP nomination for WHS with updated area limits.
5. Drastic retrenchment of Government financing to the National Park Directorate disabling it to carry out its activity in a quality manner.

In conclusion, as regards the increasing serious threats to the World Heritage Site protection and the non-observance of recommendations given by the two UNESCO/WHC-IUCN missions (dd. 2002 and 2004), we consider that Pirin National Park shall be included in the List of World Heritage in Danger. In the current political and economical situation in Bulgaria, it is the only action of the World Heritage Committee that would give a clear signal to the Bulgarian Government for taking the measures required to stop the destruction of the World Heritage Site.

Sincerely yours,

Rossen Vassilev
Executive Director



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BRIEF REVIEW OF THE INFRINGEMENTS OF PIRIN NATIONAL PARK AND WORLD HERITAGE SITE PROTECTION STATUS IN THE PERIOD 1982-2008

1. Exclusion of territories from Pirin National Park area within the World Heritage Property without preliminary consultations and agreement with World Heritage Committee (Fig. 1).

a/ In 1987 the Bulgarian Government excluded 16.1 ha from the Park area with the purpose of forestry activities in:

A. Dobrinishte region – 10.1 ha

B. Sandanski region – 6 ha

b/ 1999 - The Bulgarian Government excluded 134.4 ha from the Park area with the purpose of legalizing illegally built private villas and a ski run and zone in:

C. Razlog Park region – Kulinoto – 58.1 ha. On this territory a ski zone had been established, and a ski run and facilities built and installed.

D. Sandanski Park region – 76.4 ha. On this territory hundreds private villas had been built.

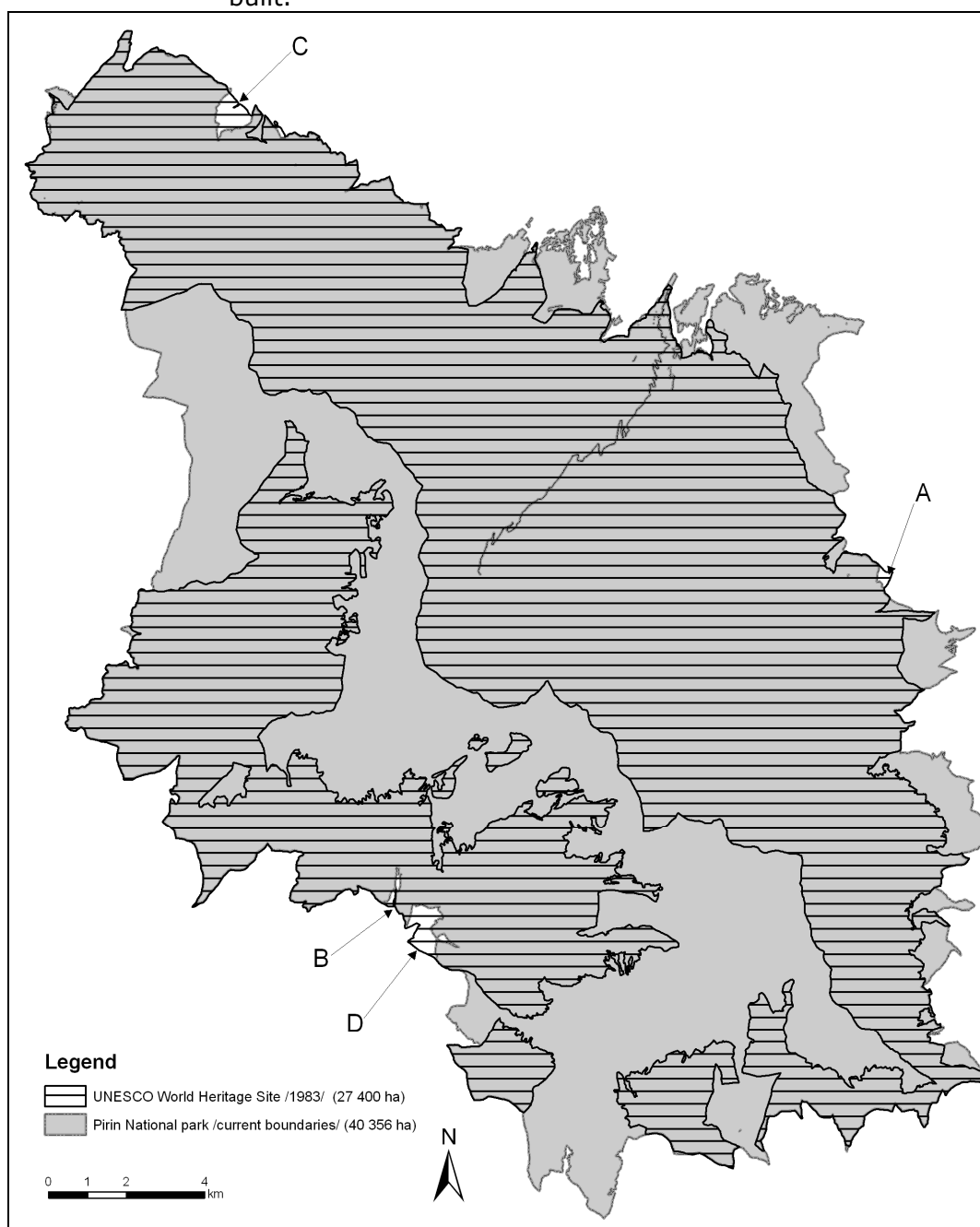


Fig. 1:

Excluded territories from Pirin NP within WHS property without agreement with the World Heritage Committee.

A - Dobrinishte region - forestry,

B - Sandanski region - forestry,

C - Razlog Park region - Kulinoto - ski run,

D - Sandanski region - villas.

2. Chronology and Infringements of Pirin NP and WHS Status

1977 - The first Technical Management Plan of the Park was approved which limits significantly the forestry activities and introduced a ban on new buildings.

1982 – 1987 Construction of ski runs and lifts in the regions of Bansko and Dobrinishte in contradiction with the prescriptions of the First Technical Management Plan of the Park.

1987 – The Bulgarian Government put an end to construction of new ski runs and facilities.

1988 - The Municipality of Bansko approved a Territorial Tourism Development Plan. The Development Plan envisaged legalization of the completed constructions and development of ski tourism in the region of Bansko and Dobrinishte through new facilities in contradiction with the First Technical Management Plan of the Park.

1992 – Construction of the first illegal private villas in Sandanski Park region.

1993 – The Bulgarian Government approved the second Technical Management Plan of the Park which envisaged removal of some illegally built ski runs and their reforestation. A total ban of construction of new ski runs and buildings for private use was introduced.

1993 – 1999 – Intensive build up of private villas in Sandanski Park region followed.

1997 – Ski run in Kulinoto/ Razlog Park Region was cut and constructed in the form of fire preventive opening in the forest.

1998 - 1999 - The Municipality of Bansko approved new Territorial Development Plan of Bansko Ski zone which envisaged construction and installation of new ski runs, lifts and other facilities in contradiction of the Second Technical Management Plan of the Park.

2000 – The Bulgarian Government approved the Territorial Development Plan of Bansko ski zone (1998) and allowed the construction of new ski runs, lifts, buildings and artificial lakes. A concession on Bansko ski zone within the Park boundaries was established and granted to a private Share hold.

2001 – 2003 - Construction of ski facilities (runs and lifts) within and outside of Bansko ski zone followed including infringements of the concession conditions and the permits issued by the Government.

2004 – The Bulgarian Government approved the third Management Plan of Pirin NP, developed with the financial and expert support of the Swiss Government. The Management Plan reflected and included the Concession granted by the Government and prohibited new constructions of ski runs and facilities except those envisaged in the Concession as well as reconstruction of the only ski run in Dobrinishte.

2005 – 2007 - The construction of new ski facilities outside the limits of the Park Management Plan continued.

2007 – The Municipality of Bansko approved new Plan for extension of Bansko ski zone in violation of the current Park Management Plan (2004) and the Bulgarian Ministry of Environment and Water approved this Plan of extension.

2007 – The Municipality of Bansko took a decision to develop and establish Dobrinishte Ski zone outside the limits of the current Pirin NP Management plan (2004).

2007-2008 – The Bansko Ski zone Concessioner implements the extension of the Bansko Ski zone.

2008 – The District Administration in Blagoevgrad approved a Plan for establishment of large "Ski and golf complex –Kulinoto", 90% of which fall within the territory of the "Pirin" NP and WHS in contradiction with the current Park Management Plan. The ski and golf complex falls within the administrative boundaries of the municipalities of Razlog, Simitli and Kresna.

More details on the infringements in Pirin NP and WHS in the period of 2007-2008 are described in Annex 2.

VIOLATIONS OF PIRIN NP MANAGEMENT PLAN AND OTHER BULGARIAN AND EUROPEAN LEGISLATION IN THE PERIOD 2007-2008

1. The acceptance of the Detailed Spatial Development Plan of "Ski and Golf complex – Kulinoto"

On January 28th 2008 the District Expert Council chaired by the Regional Governor of Blagoevgrad District authorized a Detailed Spatial Development Plan (DSDP) of the project "Ski and golf complex – Kulinoto", 90% of which fall within the territory of the "Pirin" National park and the World Heritage Site (WHS)¹. The ski resort is planned to tightly encompass the Strict nature reserve "Bajovi dupki – Djindjiritsa" with exception of cabin car lift and a number of tourist trails (Fig. 2).

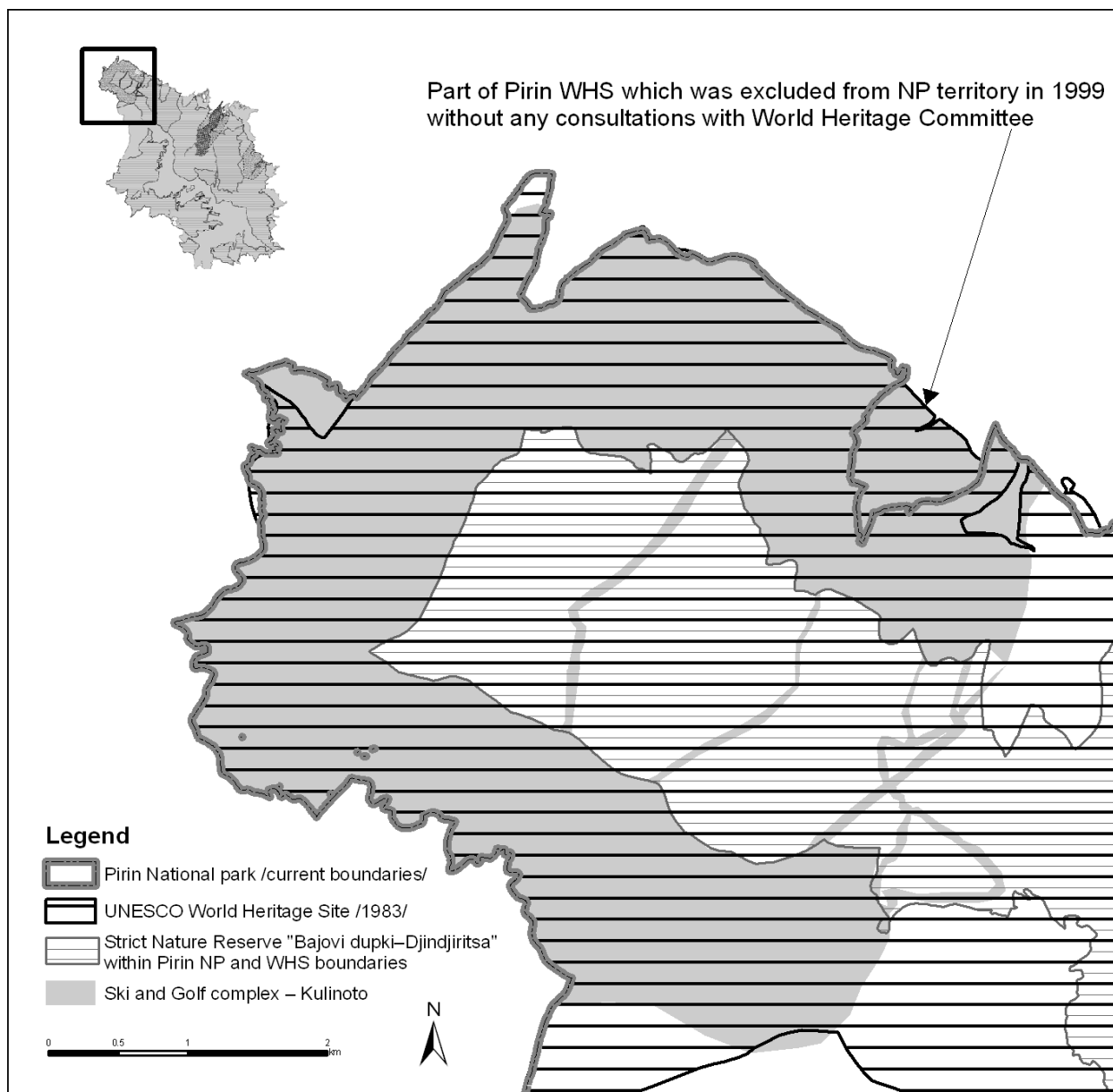


Fig. 2: Ski and Golf complex – Kulinoto

The DSDP was authorized without Strategic Environmental Assessment (SEA) and Article 6 assessment, which can clearly be seen in letter N^oOBOCY-2371/26.02.2008 issued by the Ministry of

¹Part of the ski resort falls also within the area which is currently part of Pirin World Heritage Site but which was excluded from the National Park territory in 1999 without any consultations with the World Heritage Committee.

2. The illegal developments in Bansko ski zone

The on-going development of Bansko ski zone (100 ha) in "Pirin" NP and WHS is in total contradiction with the prescriptions of EIA permits and the Management plan of the park:

- The prescribed capacity of the Bansko ski zone of 7800 persons was violated by the Bulgarian authorities by authorizing and/or tolerating new ski facilities and significant numbers of beds exceeding 50 000 beds.
- Exceeded is the ski zone area permitted by EIA, Pirin NP Management Plan and the concession contract by the construction. In stead of 100 ha damaged are 250 ha.
- 6 out of 12 new ski runs has no EIAs , 15 out of 21 cable ways have no EIAs
- Violations of the issued EIA acts - substantial expansion of the ski runs and facilities, large-scale excavation, uprooting of tree-logs, use of explosives etc.
- Some last examples of violation of the European environmental legislation are already sent to the European commission:

2.1 Project "Construction of a four-seats lift in the area of Chalin Valog in Bansko ski zone"

The whole project falls within the territory of Pirin NP and WHS. The construction of the lift started in the beginning of 2007 and constructed before its semi-legal authorization by the MoEW on 13th of December, 2007.

2.2 Modification of the Spatial Development Plan of ski zone Bansko – construction of three drag lifts with lengths of 300 m, 300 m and 150 m.

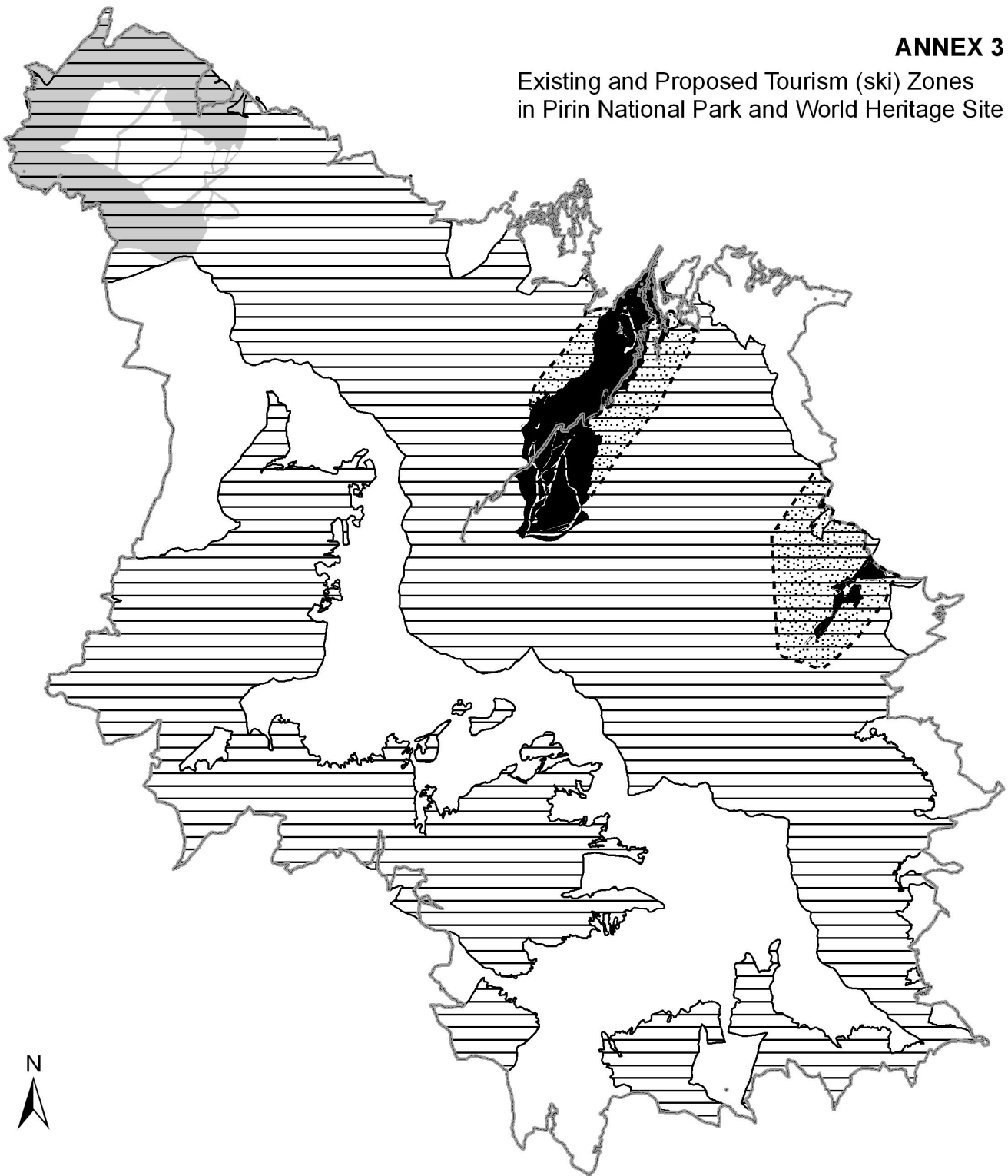
On 19th of December 2007 with Decision N 44 the Municipal Council of Bansko (published in the Official journal of the state) changes the SDP of ski zone Bansko, which allows the construction of three drag lifts. All three lifts fall within the territory of Pirin NP and WHS. The decision of the municipal council was accepted without following the procedures described in the SEA Directive and Article 6 of the Habitats Directive.

3. A project for the extention of the "Dobrinishte" ski zone

On 10th May, 2007, the Municipal council of Bansko accomplished a procedure for the selection of an investor for the development of the "Dobrinishte" ski zone. Greatest part of it falls within Pirin NP and WHS. The procedure in question is indicative of the plans of the local authorities to continue the construction of new infrastructure projects within the territory of the Park. Unfortunately, the project is kept in secret and the only concept of the project is witnessed by NGOs during consultative meetings in the local authorities.

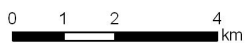
ANNEX 3

Existing and Proposed Tourism (ski) Zones in Pirin National Park and World Heritage Site



Legend

- Existing tourism (ski) zones according Pirin NP management plan /2004/
- Partially approved ski zone in contradiction with Pirin NP management plan
- Proposed extensions in a planning phase of the existing ski zones
- Pirin National park /current boundaries/ (40 356 ha)
- UNESCO World Heritage Site /1983/ (27 400 ha)



	in WHS [ha]	in NP [ha]	[%] of WHS	[%] of NP
Existing (ski) zones	981	998	3.58	2.47
Partially approved (ski) zone	1660	1632	6.06	4.05
Proposed extensions	1502	1542	5.48	3.82
Total	4142	4172	15.12	10.34