

## **RMM 2020: Ongoing and planned modifications and developments are exacerbating this already vulnerable situation *TOWARDS A POINT OF NO-RETURN***




Since August 2021, when the WH Committee, instead of inscribing Ohrid Region on the List of WH in Danger, (again) granted North Macedonia (and Albania) 2 more years to implement the recommendations:

procedures for 53 urban plans and projects were initiated or continued; at least 212 new construction permits were issued – contrary to the Recommendation for an immediate moratorium on any urban or coastal transformation (issued by RMM 2017 and repeated by RMM 2020); at least 400 illegal constructions have been legalized (including some of the illegal constructions which were reported by the National Park Galichica as a priority for demolition); the Law on legalization of illegal constructions was extended – contrary to the Recommendation No.9 from RMM 2017; over 78% of the activities in the World Heritage Management Plan which should have been finalized or at least started by now, haven't been initiated yet; instead, they were copied in the Strategic Recovery Plan, but with new, extended deadlines; new Fishery Base was proposed, which allows fishing of the endemic and endangered Ohrid trout, contrary to the Strategic Recovery Plan, which envisages a ban on fishing this species; previously closed beach bars (and many of them reported as “removed illegal constructions”) were re-opened this summer and new concessions were signed for the next 2 years; new factory was opened in the free economic zone near Ohrid airport; etc.

This is hardly the tip of the iceberg when it comes to the real life activities that took place during the 2 year period granted by the World Heritage Committee in 2021. We are especially worried by the documents and procedures which seem to be beneficial for the preservation of the OUVs, but in reality, at best they won't bring any significant change, at worst they enable continuation of destructive activities, but “in accordance with the law”.

# Example of the new legislation: Law on Proclamation of Studenchishte Marsh as a Nature Park, currently at the Assembly



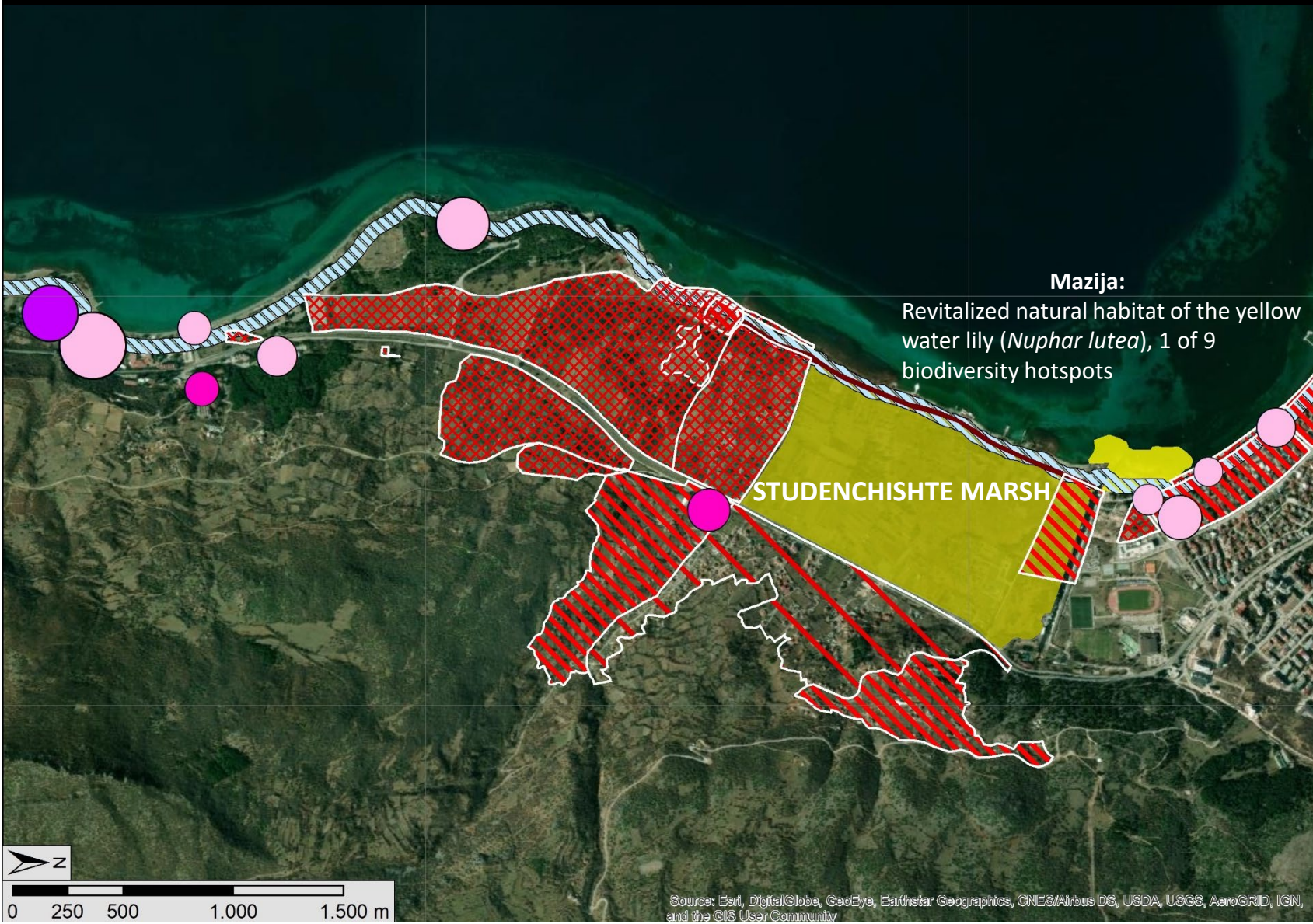
-  Zone of strict protection
-  Zone of active management
-  Zone of sustainable use

The last remaining marsh from the extensive wetland on the east shore of Lake Ohrid. Crucial part of the ecosystem and an exceptional habitat on its own. In 2021 designated Ramsar site (together with Lake Ohrid).

- No buffer zone defined (so, no obstacles for planned nearby urbanization);
- Highly fragmented zone of strict protection (only 8,85%);
- No reallocation of the main polluter within the marsh;
- Municipality of Ohrid proposed to be the managing body;
- Property owners to take part in the definition of the allowed activities in the zone of sustainable use.





All our comments were rejected. Ramsar's concern about the lack of a buffer zone was ignored.

# Studenchishte Marsh area with new urban plans and illegal hotels



Mazija:  
Revitalized natural habitat of the yellow water lily (*Nuphar lutea*), 1 of 9 biodiversity hotspots

STUDENCHISHTE MARSH

-  Envisaged urban plans at various stages of the adoption process
-  Illegal hotels with approved legalization
-  Illegal hotels with on-going legalization
-  Illegal hotels with no information on legalization process

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**The promenade cutting the connection with the lake**

**Studenčishte Marsh**  
Home of 79 bird species; at least 9 species of amphibians and at least 8 species of reptiles; 15 species of fish; 34 types of dragonflies (15 on IUCN global red list); 106 diatoms; etc.

**New urban plan “Gorica North” Weekend houses, motels/hostels, restaurants, shops, infrastructure, etc. 17.05 ha. SEA Report “confirms” that the plan will be beneficial; Ministry of Environment approved this Report**

# The Temporary Protection of Studenchishte Marsh



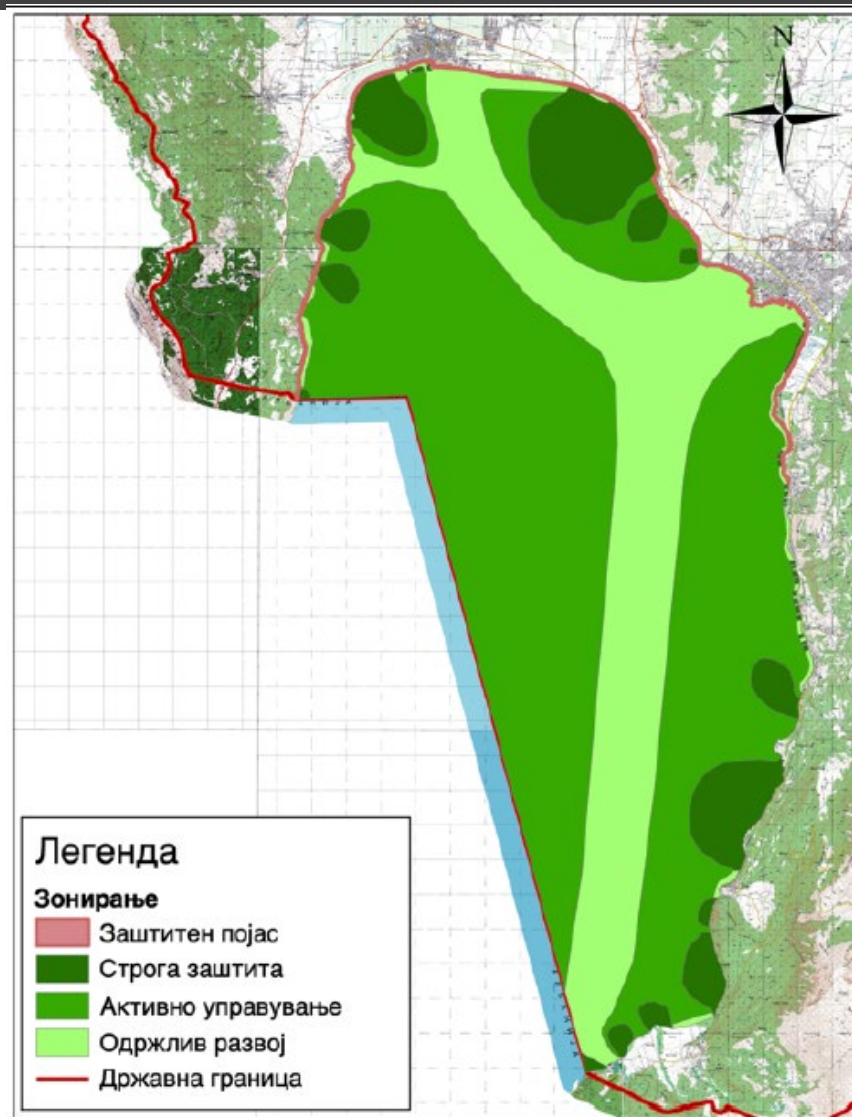
In theory Studenchishte Marsh is under Temporary Protection, which bans any development within the Marsh until its formal proclamation as a Nature Park. In reality new villas are under construction and there are other preparations/interventions – all within the Marsh.

We submitted an initiative for an inspection to the State Environmental Inspectorate for these illegal developments and the breach of the Temporary Protection Decision; at first the Inspectorate didn't act, but did so after in May 2023 we sent a letter to the State Council of Inspection Authorities.

To this day (11.09.2023) the situation hasn't changed, the constructions are still there.

## Example of the new legislation:

### Law on proclamation of Lake Ohrid as a Monument of Nature, public hearing 14.09.2023



**Red** Bufer zone – 50m. Already protected by Law on Water; no analysis, exclusion of vitally important parts; no implementation of the WH Management Plan. Allowed activities: construction of concrete, metal, wood structures, traditional agriculture, etc.

**Dark Green** Zone of strict protection – only 11,9% of the total area

**Medium Green** Zone of active management – allowed activities: electric boats, commercial fishing, etc.

**Light Green** Zone of sustainable use

Based on Valorization Study done without any field research, no information for up-to date state of the species and habitats, actual threats, etc. – compilation of some existing material (map of threats from 2010). IUCN study.

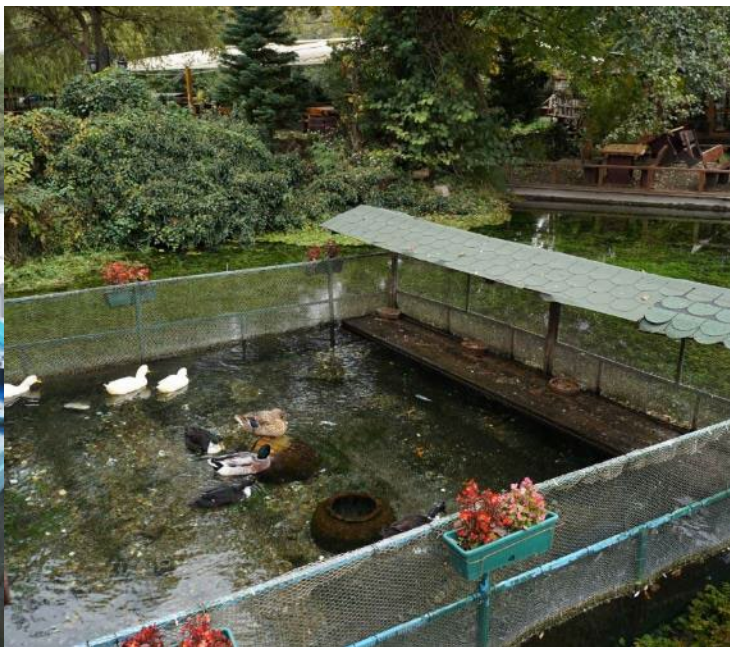
# St. Naum springs – touristic complex in the zone of strict protection



Raft Floating  
Restaurant in the  
strictly protected area  
of St. Naum springs –  
6 platforms over the  
springs (NP Galichica).

The Law on Nature  
Protection allows only  
scientific research in  
this zone.

Over 1.000 tourists  
visit with boats and/or  
cars daily, during the  
summer season.







Draft Management Plan for St. Naum area envisages even more tourism development activities, despite defining the tourism as one of the main threats to the natural values of this sensitive area.

Waste water from all the touristic facilities ends up untreated in the lake. Recently established monitoring of the water quality detected escherichia coli bacteria in the springs.

# On the Spot Appraisal – the same small HPP before, during and after the OSA

27.03.2023



27.04.2023 - OSA



08.05.2023



One of the main explanations for non-implementation of UNESCO's recommendations, of both central and local authorities (since 2017) is that "it can't be done overnight", "the situation is complex and problems have been accumulating for many years" - **WHILE CONTINUING TO ACCUMULATE THE PROBLEMS.**

Many of the new laws and plans enable continuation of the urbanization and other threats, they have significant gaps and are created/adopted for the sake of meeting a deadline from UNESCO and showing dedication to the preservation.

