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World Heritage Centre
UNESCO
7, Place de Fontenoy
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Subject: Request for deletion of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” (further only PBFC UNESCO)

Dear Madam/Dear Sir,

we appeal to you with a request for deletion of the Slovak part of the UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” (further only PBFC UNESCO) within the meaning of paragraph 192 b) of the Operational Guidelines for the Implementation of the World Heritage Convention (further only OG WHC). According to the paragraph 192 b) it is possible to delete the property from the World Heritage List in case “where the intrinsic qualities of a World Heritage site were already threatened at the time of its nomination by action of man and where the necessary corrective measures as outlined by the State Party at the time, have not been taken within the time proposed (see paragraph 116 OG WHC)¹.”

The reason for our request is a non-fulfilment of obligations of the Slovak Republic resulting from the Convention Concerning the Protection of the World Cultural and Natural Heritage which is valid for the Slovak Republic since its creation in 1993 as following country after former Czechoslovakia². The identification, protection and conservation of natural heritage of the PBFC UNESCO in Slovakia, as a basic duty of each State Party to the Convention, are not

¹ Paragraph 116 OG WHC. Where the intrinsic qualities of a property nominated are threatened by action of man and yet meet the criteria and the conditions of authenticity or integrity set out in paragraphs 78-95, an action plan outlining the corrective measures required should be submitted with the nomination file. Should the corrective measures submitted by the nominating State Party not be taken within the time proposed by the State Party, the property will be considered by the Committee for delisting in accordance with the procedure adopted by the Committee (see Chapter IV.C).

² Notification of the Federal Ministry of Foreign Affairs No. 159/1991 Coll. on Concluding the Convention on World Cultural and Natural Heritage Protection. Each State Party to this Convention (including Slovakia) recognizes the duty of ensuring the identification, protection and conservation of the cultural and natural heritage situated on its territory by taking the appropriate legal, scientific, technical, administrative and financial measures necessary for the identification, protection and preservation of this heritage.

ensured. The Slovak Republic declares, to the UNESCO authorities, as well as the whole world, the non-existing stage even 5 years after enlistment the sites to the UNESCO World Heritage List. At the same time, the Slovak Republic continues in systematic destruction of the subject of protection in PBFC UNESCO by logging and supporting projects which result in damaging of these sites. In spite of the full foreknowledge about actual problems with protection of the PBFC UNESCO and professionally prepared and submitted proposals for protection of the PBFC UNESCO by the department of the nature conservancy, the whole process is blocked by other state departments which provide logging in these areas. The aim of our request for deletion of the Slovak part of the PBFC UNESCO is an establishment of the stage which would be adequate to the reality in protection of the PBFC UNESCO, seeing that the Slovak Republic is not able to fulfil its international obligations already 5 years!

Since the declaration of the Primeval Beech Forests of the Carpathians, Slovakia and Ukraine – Decision 31 COM 8B.16 as the UNESCO World Natural Heritage Site (in 2011 the Ancient Beech Forests of Germany were included) in Christchurch, New Zealand in 2007, the WOLF Forest Protection Movement has systematically tried to show how important is the duty of the state to assure protection of these rare sites in the area of Slovak Republic so that their damaging or destroying will not occur and they will be preserved for future generations. In decision is written that the effective implementation of the integrated management plan is required to guide the planning and management of this property. This more detailed plan is mentioned in the nomination project on the basis of which the decision was taken. There is written, among others: “The management plan of each nominated site is based on strict non-intervention. **Both sides guarantee strict protection of nominated forests (according to Ia).** The main aim is to leave these properties for spontaneous self-regulative development without human impacts.”

Since 2008 we have warned the public³, the State Nature Conservancy of the Slovak Republic, several owners and users (the state enterprise Forests of the Slovak Republic and the state enterprise Forest-Agricultural Estate Ulič), District Forest Offices, Ministry of Environment of the Slovak Republic, Ministry of Foreign Affairs of the Slovak Republic, Slovak Committee for UNESCO and other interested subjects⁴ (see Appendix I) of prepared or actually direct destroying of the PBFC UNESCO.

During the process of declaration, in the nomination project itself as well as in steps following the declaration of the PBFC UNESCO, several crucial inadequacies occurred and still occur and we have warned all interested subjects ever since 2008.

The first crucial inadequacy during the declaration of these sites in the area of the Slovak Republic as UNESCO forests was, that the owners and user of the area, public and non-governmental organizations had almost no information about the plan to declare these areas, where, why and what it would mean for all interested subjects. Furthermore, it is not clear which state authorities and institutions enforced this issue and thus which of them are responsible for this situation.

The second crucial inadequacy is a localization of the area itself. Maps from the nomination project remain the only publicly used maps until now. However, these maps are inaccurate. After their overlapping in GIS (L’Huillier ’s formula) was found that the area of Vihorlat, marked in this

³ Ugly truth about „UNESCO“ forests in Slovakia – the document published on the WOLF Forest Protection Movement website in 2009 – <http://www.wolf.sk/sk/lesy/unesco-lesy>

⁴ Overview of WOLF Forest Protection Movement activities and communication with all interested subjected relating to the PBFC UNESCO from September 2007 until now – Appendix I.

map, is about 1,173 ha smaller and the area of Stužica is about 1,068 ha smaller than their area stated in the obligatory written part of the nomination project. The borders in these maps do not take into account natural or administrative structuring, thus, it is almost impossible to mark them in the field. The solution of this inadequacy was included in proposals of the State Nature Conservancy of the Slovak Republic for declaration of UNESCO forests as nature reserves (further only “NR”) (NR Borsukov vrch, NR Černiny, NR Pramenisko Cirochy, NR Nežabec and NR Vihorlatské pralesy). These reserves should assure the protection of this area. However, approving of these proposals, prepared in 2011, is blocked with disagreement of owners/users (mostly a state ownership – 80%) up to now. Not even on the basis of several discussions with owners and users the agreement was not reached and the Ministry of Environment or more precisely District Environmental Office refused to assure the protection of these areas without these agreements. From our point of view it is a failure of the state authorities because the state is obliged to protect this property on international level and most of the area belongs to the state.

As an example we show two so-called logging maps in small part of the UNESCO forests in which planned as well as realized logging in the area of the PBFC UNESCO is marked:

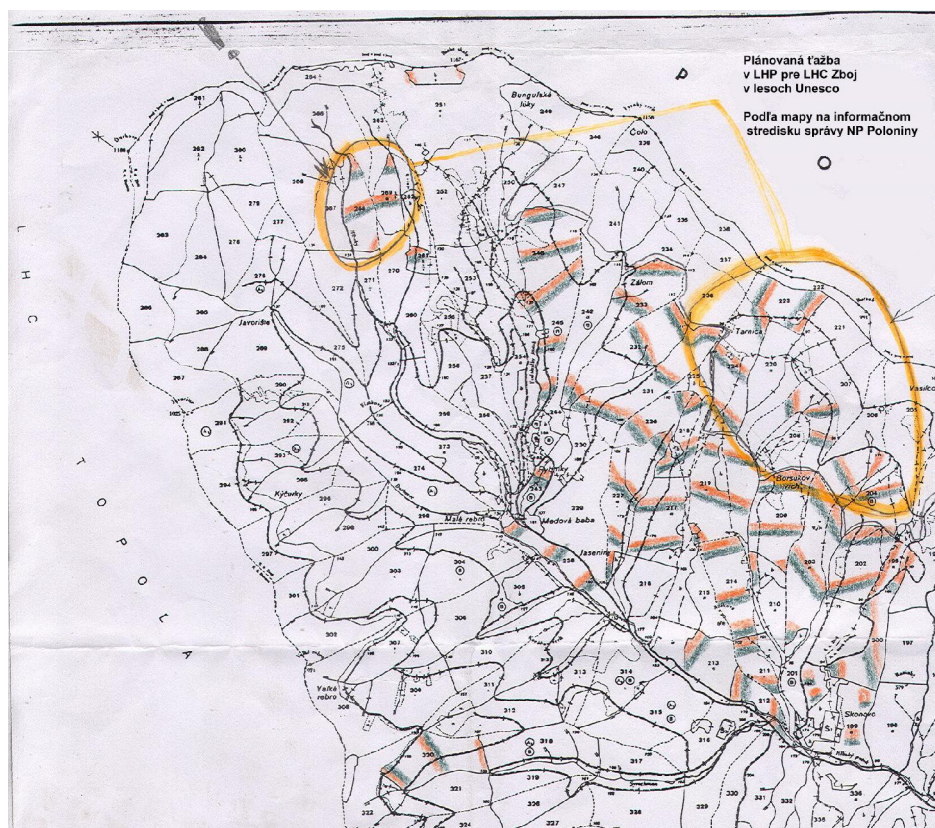


Fig.2 – Logging map of Vihorlat Protected Landscape Area, Morské oko valley

In maps only that regeneration felling is marked which was already performed or about to be performed absolutely legally in the next days or years. The tending felling is not marked there.

During the Forest Management Plan hearing the WOLF Forest Protection Movement, which took a part during the process of Forest Management Plan preparation only as a concerned person, required the change the category of the UNESCO forests to the special purpose forests with a prescription of management intervention “without intervention”. Despite our comments, the standard forest management interventions were planned in the UNESCO forests. The forest planning documents do not take into account the status of declared UNESCO sites in no way.

Fig. 3

Planned logging in cubic meters in forest segments which are part of UNESCO Core area in SNINA Territorial Logging Unit - period 2011-2020

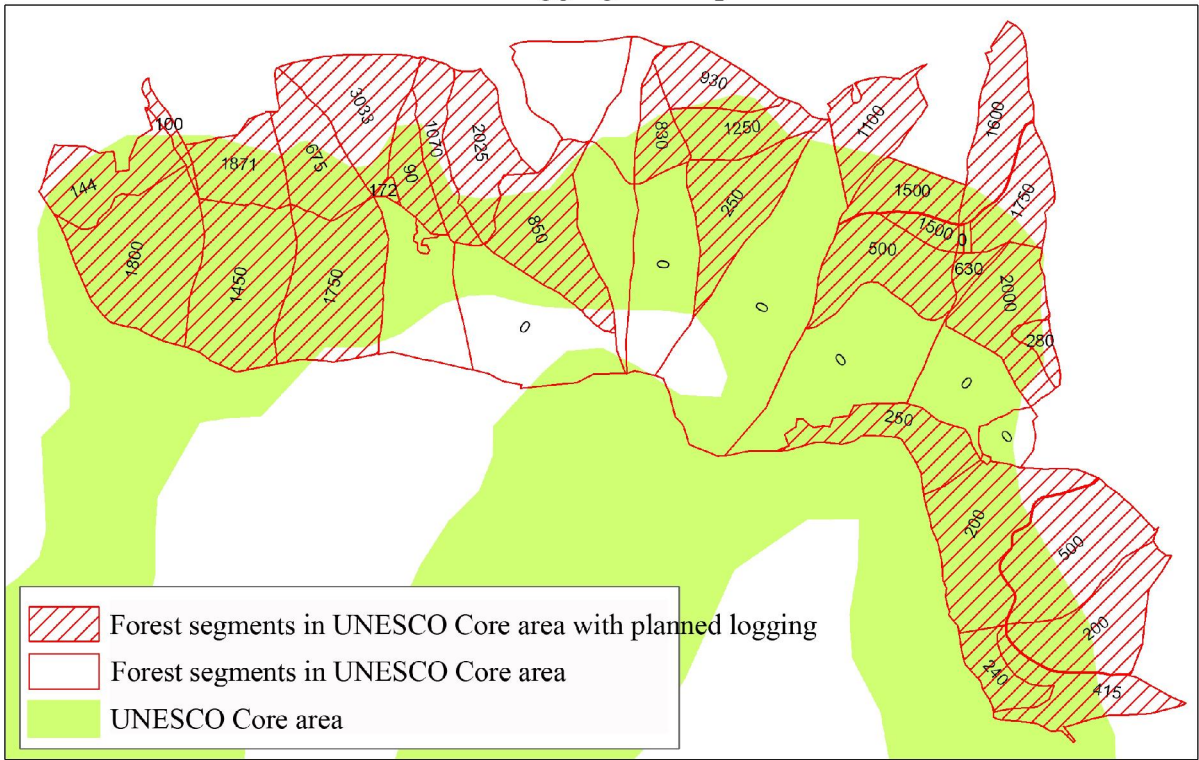
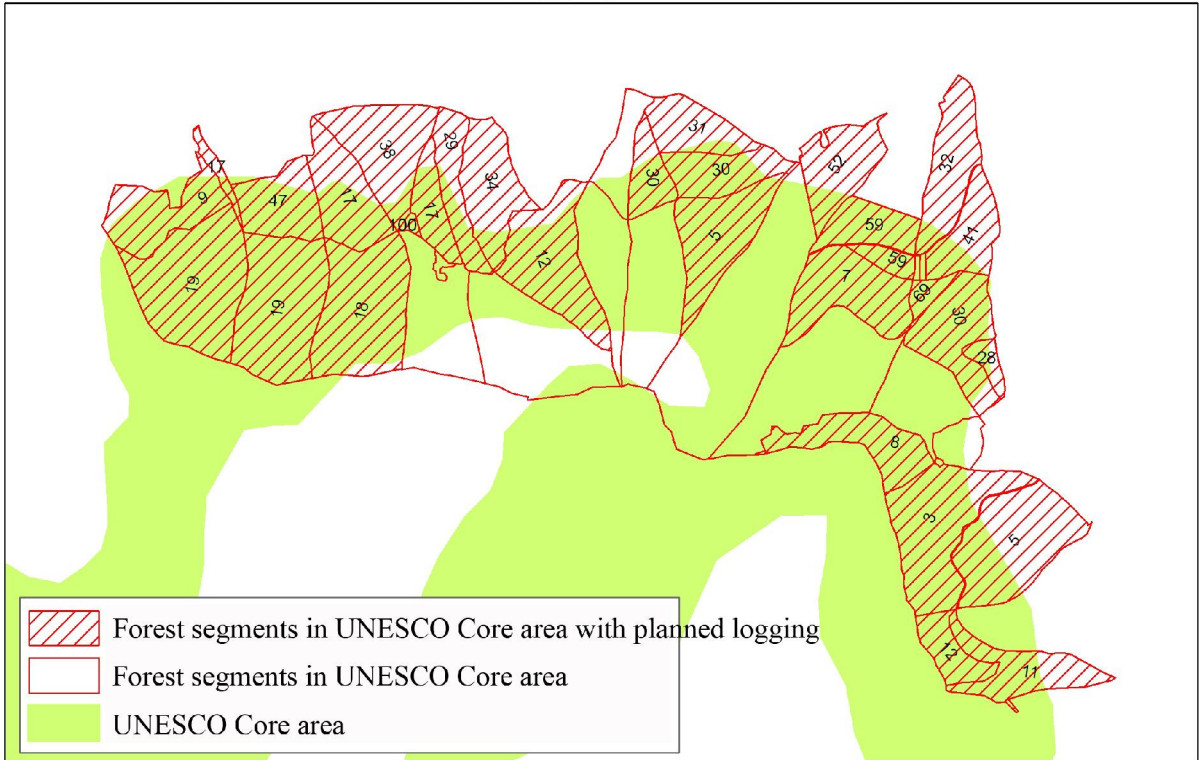


Fig. 4

Planned logging in % in forest segments which are part of UNESCO Core area in SNINA Territorial Logging Unit - period 2011-2020



The fourth crucial inadequacy is the fact that the Ministry of Environment of the Slovak Republic itself agreed with the project of the ski resort “Biele kamene (White stones)” also after enlistment these forests in the UNESCO World Heritage List. This project took account of permanent deforestation of the part of UNESCO forests under the Sninský kameň because of ski runs. Consequently, the project was approved in the ground plans of Zemplínske Hámre village, Snina town and Prešov self-governing region. Furthermore, in the UNESCO forest Stuzica the group of representatives of local self-administrations prepare the construction of a new border crossing and automobile road to Poland. This vision was almost approved in the ground plan of Prešov self-governing region and, nowadays, it is shown in approved ground plan of Stakčín village. This allows further destroying of UNESCO forests.

The fifth crucial inadequacy is a reversal of particular state policies and diametral divergences of opinion of particular state departments in Slovak Republic. Organizations which administrates state forests (the state enterprise Forests of the Slovak Republic, Military Forests and Estates of the Slovak Republic and state enterprise Forest-Agricultural Estate Ulič) principle do not agree with the declaration of UNESCO forests as protected area and logging in these forests continue also despite of current protection resulting from submitted proposals for declaration of protected areas. As employees of the State Nature Conservancy of the Slovak Republic alleged in the letter addressed to Ministry of Environment of the Slovak republic⁵ (see Appendix II): “The owners are not aware of benefits resulting from enlistment in the UNESCO World Heritage List and the Forests of the Slovak Republic as well as other state subjects do not respect and do not support state duties and they do not cooperate in protection of the world heritage. It is evident that, in Slovakia, the legislative setting for preservation and protection of the PBFC site are inadequate or more precisely unenforceable, the coordination between state institutions is insufficient and the state policy for realization of international duties and necessity of preservation of natural heritage absent.”

During the period 2008-2012 various state institutions carried out several measures which should lead to the resolution of before mentioned problems. The chronological description of particular measures is shown in the letter of the State Nature Conservancy of the Slovak Republic (see Appendix II) which was sent to the Ministry of Environment of the Slovak Republic in the middle of March 2012. In short, since 2008 the authorities and organizations under the Department of Nature and Landscape Protection carried out several measures leading to correction of inadequacies resulting from the nomination project (discussions with authors of the nomination project, interested departments – Ministry of Agriculture and Rural Development of the Slovak Republic and Ministry of Defence of the Slovak Republic, inter-departmental discussions, discussions with owners and users, specification of size and borders) and assurance of the PBFC UNESCO protection (unsuccessful elaboration of proposals for protection of five nature reserves). These efforts culminated in autumn 2012 when the proposal of five nature reserves was submitted to the District Environmental Office in Prešov for approval. Their area, together with existing reserves, approximates to the area stated in the nomination project. During the approval procedure which followed, interested owners and users mostly disagree and the **District Environmental Office in Prešov**, as a competent state authority, **did not approve these proposals**.

As it is further mentioned in the letter (see Appendix II), the Ministry of Environment of the Slovak Republic, despite all above-mentioned facts, does not discuss about these problems with Ukrainian and German partners as well as UNESCO Committee and confidently tampers with the next

⁵ Important attention to necessity of solution the protection of the World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” in Slovak part of the serial site. Letter No. ŠOP SR/947/2012 from 14.03.2012.

cooperation on protection of natural beech forests on the international level although it is not able to assure the basic condition, i.e. protection of the PBFC UNESCO on the national level.

It is important to mention that in summer 2011 Mr. Geoff Law carried out the mission in UNESCO forests in Slovakia. The aim of this mission was to understand the protection and management of forests belonging to the World Natural Heritage in Northern Hemisphere and apply these experiences to the conditions in Australia, more precisely Tasmania⁶ (see Appendix III). During the mission Mr. Law had a meeting only with representatives of the third sector because attempts to meet representatives of the State Nature Conservancy of the Slovak Republic were unsuccessful. Following the results of his study tour, Mr. Law, in his letter addressed to the Slovak Embassy in Australia, appealed that the Slovak Republic should consider the repeated nomination of the Slovak part of the PBFC UNESCO with significantly more extensive and better selected parts of forests, including current core and buffer zones; with inclusion of relevant river-basins; with assurance of complete protection of mentioned forests; with determination how to restore the areas damaged by logging and with assurance of complete protection of all organisms, including bears and wolves.

From nature protection point of view, it is important that, in these localities, the hunting is practiced without whatever protective restrictions also after declaration of the UNESCO World Natural Heritage in 2007. The localities are part of state as well as private hunting-grounds, new hunting facilities are built there and hunters organize hunts. Besides red deer, wild boars and roe deer also animals such as wolf are legally shot there. During last winter, at least five wolves were officially killed in the territory belonging to the UNESCO Primeval Beech Forests of the Carpathians.

The sixth crucial inadequacy is a non-fulfilment of recommendations stated in Decision No. 31 COM 8B.16 whereby the primeval beech forests of Slovakia and Ukraine were declared as one of the UNESCO World Natural Heritage Site. The Slovak Republic does not fulfil these recommendations even 5 years after declaration of the PBFC UNESCO as the World Natural Heritage Site.

Recommendations stated in the Decision WHC No. 31 COM 8B.16:

- a) Enhance implementation of the existing Integrated Management Plan and establish a functional Joint Management Committee as proposed by the States Parties.

Fulfilment: Integrated Management Plan does not exist and functional Joint Management Committee was not established.

- b) Include in the Integrated Management Plan provisions for input from local citizens, NGOs and other interest groups.

Fulfilment: we have no information that the responsible authorities contacted owners, users, NGOs representatives, local people or interested groups for purpose of involving their opinions, comments or requirements into the Integrated Management Plan.

- c) Give priority in the Integrated Management Plan to research and monitoring as this, considering the volume and relevance of existing baseline data and information for the sites

⁶ Distant Affinities – The challenges facing temperate forests in World Heritage Areas (USA, Slovakia and Japan), Report to the Winston Churchill Memorial Trust of Australia, December 2011 – Appendix III

included in this serial nomination, can provide a valuable contribution to understanding the potential impact of global climate change.

Fulfilment: We have no information that monitoring or research specifically focused on this requirement would run in the areas of the PBFC UNESCO.

- d) Explore options to provide additional funds to support the effective implementation of the Integrated Management Plan and the work of the Joint Management Committee.

Fulfilment: We have no information.

- e) Clearly mark on the ground the boundaries of all the sites included in this serial nomination.

Fulfilment: The borders are not marked in the field even 5 years after the declaration of the area as the UNESCO World Natural Heritage. Maps from the nomination project, which are inaccurate, remain the only publicly used maps until now. The area distinguished in these maps is significantly smaller than the area mentioned in the written part of the nomination project. The borders in these maps do not take into account natural or administrative structuring, thus, it is almost impossible to mark them in the field. Newly proposed map records, which were a part of proposals for protection of these areas, were not approved by competent state authorities.

In term of these facts we require the deletion of the Slovak part of declared UNESCO World Natural Heritage Site “Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany” (PBFC UNESCO) because, according to our opinion, the paragraph 192 b) of the Operational Guidelines for the Implementation of the World Heritage Convention (OG WHC) was fulfilled. According to our opinion, the intrinsic values of the World Heritage Site - Slovak part of the Primeval Beech Forests were already threatened at the time of its nomination by action of man and the necessary corrective measures have not been taken within the time even 5 years after declaration.

Yours sincerely,

Viliam Bartuš
Head of the tribe
WOLF Eastern Carpathians Mountains

Appendices:

Appendix I - Overview of WOLF Forest Protection Movement activities and communication with all interested subjects relating to PBFC UNESCO from September 2007 until now.

Appendix II - Important attention to necessity of solution the protection of the World Natural Heritage Site "Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany" in Slovak part of the serial site. Letter No.ŠOP SR/947/2012 from 14.03.2012.

Appendix III - Distant Affinities - The challenges facing temperate forests in World Heritage Areas (USA, Slovakia and Japan), Report to the Winston Churchill Memorial Trust of Australia, December 2011.

To be send:

1. **IUCN Conservation Centre**, Rue Mauverney 28, 1196, Gland, Switzerland
2. **Slovak Committee for UNESCO**, Ministry of Foreign Affairs of the Slovak Republic, Hlboká cesta 2, 833 36 Bratislava, Slovak Republic
3. **Deputy Permanent Delegate of Slovakia to UNESCO, Ambassador H.E. Mr. Igor Grexa**, 1, rue Miollis, 75732 Paris, Cedex 15, France
4. **Ministry of Environment of the Slovak Republic**, Department of the EU and Environmental Policies, Nám. Ľ. Štúra 1, 812 35 Bratislava, Slovak Republic
5. **Ministry of Environment of the Slovak Republic**, Department of Nature and Landscape Protection, Nám. Ľ. Štúra 1, 812 35 Bratislava, Slovak Republic
6. **Institute of Forest Ecology, Slovak Academy of Sciences**, Viliam Pichler (principal preparer), Štúrova 2, 960 53 Zvolen, Slovak Republic
7. **Vysoké Tatry National Park Administration**, Ivan Vološčuk, Zdravotné stredisko č. 86, 059 60 Tatranská Lomnica, Slovak Republic
8. **Carpathian Biosphere Reserve**, Fedir Hamor, Krasne Pleso str.,77, Rakhiv, 90600, Transcarpathian Region, Ukraine
9. **State Agency for Protected Areas**, Ministry of Environmental Protection of Ukraine, 35 Uryts'kogo Str., 03035 Kyiv, Ukraine
10. **Carpathian Biosphere Reserve**, Krasne Pleso str.,77, Rakhiv, 90600, Transcarpathian Region, Ukraine
11. **Uzhanskyi National Nature Park**, Vasyil O. Kopach, Shevchenka Str., 54, Velykyi Bereznyi, 89000, Transcarpathian Region, Ukraine
12. **State Nature Conservancy of the Slovak Republic, headquarters**, Tajovského 28B, 974 01 Banská Bystrica, Slovak Republic
13. **NP Poloniny Administration**, Mierová 193, 06761 Stakčín, Slovak Republic
14. **Vihorlat Protected Landscape Area**, ul. Fraňa Kráľa 1, 071 01 Michalovce, Slovak Republic
15. **Müritz National Park Authority**, Schlossplatz 3, 17237 Hohenzieritz, Germany
16. **Biosphere reserve UNESCO Schorfheide-Chorin**, Hoher Steinweg 5 – 6, 16278 Angermünde, Germany
17. **Nationalparkamt Kellerwald-Edersee**, Laustraße 8, 34537 Bad Wildungen, Germany
18. **Nationalpark Hainich**, Bei der Marktkirche 9, 99947 Bad Langensalza, Germany
19. **Slovak Museum of Nature Protection and Speleology Liptovsky Mikulas**, Skolska 4, 031 01 Liptovsky Mikulas, Slovak Republic
20. **Centre for Scientific Tourism in Slovakia**, Institute of Forest Ecology, SAS, Štúrova 2, 960 53 Zvolen, Slovak Republic
21. **Museum of Mountains Ecology and History of Nature Use in the Ukrainian Carpathians**, 77, Krasne Pleso Str., 90600 Rakhiv, Ukraine