



UÝCHODNÝE KARPATY

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World Heritage Centre
UNESCO
7, Place de Fontenoy
75352 Paris 07 SP
France

Snina, 19th March 2018

Your Excellency,

WOLF Forest Protection Movement, a Slovak NGO, has been bringing attention to the inadequate protection of the Slovak components of the World Heritage Site "Ancient and Primeval Beech Forests of the Carpathians and Other Regions of Europe" since 2008.

The World Heritage Committee has already notified the State Party of Slovakia about the necessity of solving problems of the Slovak components several times, the latest in its decision No. 41 COM 7B.4 adopted during the 41st session of the World Heritage Center. WHC urged the State Party to ensure that no logging will be possible within the property's boundaries and also urged the State Party of Slovakia to submit a proposal for boundary modifications as soon as possible.

Despite all the warnings the State Party of Slovakia has not taken any urgent measures to address the lack of an adequate protection regime of the Slovak components of the property and to ensure that their boundary delineation is adequate. The protection from logging and other potential threats cannot be guaranteed in the long-term, which clearly constitute a danger to the Outstanding Universal Value of this serial transnational property as a whole, in line with Paragraphs 137 and 180 of the Operational Guidelines.

As Slovakia is not able to secure the proper protection of the UNESCO locality, the assistance of the World Heritage Committee appears as inevitable. According to paragraph 177d of the Operational Guidelines for the Implementation of the World Heritage Convention (OG WHC), the assistance for the above mentioned property can be provided by its inscription on the List of World Heritage in Danger by any member of the Committee or the Secretariat. WOLF is convinced, that in order to take further steps in securing protection of the locality, it is necessary to assess its real state by an independent professional organization.

Therefore we kindly ask you to:

- i) list the above mentioned property for the discussion on the following 42nd session of the World Heritage Committee and
- ii) add the following paragraph to the draft decision from the 42nd session of the World Heritage Committee:

"Request the State party of Slovakia to invite a joint reactive monitoring mission by the World Heritage Centre and IUCN to assess current and potential impacts of ongoing and planned forest management operation and hunting activities on the Outstanding Universal Value of the property and to assess whether the property meets the criteria for inscription on the List of World Heritage in Danger".

Reasons for our request are as follows:

1. **A majority (67%) of the Slovak components is not protected even 10 years after it was inscribed on the list of UNESCO World Heritage Sites. The exact boundaries of the Slovak components have been never identified, nor clearly marked in the field.** Logging operations, hunting and development activities have been conducted in the property in legal

manner. Therefore the Outstanding Universal Value of the property is facing serious major threats and it can be irretrievably lost (see Annex I).

2. **The recommendations from the decision of the World Heritage Committee No. 41 COM 7B.4 adopted during the 41st session of the World Heritage Committee are not being fulfilled.** The most important recommendations, which are to ensure the adequate protection regime of the Slovak components of the property and to ensure that their boundary delineation is adequate, were not implemented. This fact is even confirmed by the State of Conservation Report of February 2018, in which the Slovak Republic admits that protection of the Slovak components has not been secured and their boundaries have not been identified yet.
<http://whc.unesco.org/en/list/1133/documents/>
3. In February 2018 Supreme Audit Office of the Slovak Republic (SAO) published the final report from the audit of the transboundary East Carpathian Biosphere Reserve. Some of the Slovak components of the World Heritage Site are parts of the biosphere reserve. Regarding their protection the SAO's report states:
 - i) The audit revealed, that considering national legislation, classification of protected areas, which was declared in international commitments, was in some areas in contradiction with their actual state of protection. Problems related mainly to delimitation of an area and securing its protection were identified also in some components of the World Heritage Site of the Primeval Beech Forests of the Carpathians and the Ancient Beech Forests of Germany of which some areas are part of the international biosphere reserve. These inconsistencies have persisted since the submission of the nomination project and since the locality was declared the World Heritage Site in 2007.
 - ii) Due to unclear delimitation of boundaries of some components the boundaries have not been properly identified in the field. Thus due to their unclear delimitation it was impossible to secure protection of some components from forest management operation and hunting activities.

Therefore we are convinced that the Slovak Republic is not able, nor willing to implement its international obligation to secure the proper conservation of the World Heritage Site, thus the assistance from the World Heritage Committee is required. The most efficient assistance for the above mentioned property can be provided by its inscription on the List of World Heritage in Danger as the criteria for the inscription stated in paragraphs 177, 178 and 180 of the Operational Guidelines for the Implementation of the World Heritage Convention (OG WHC) have been already fulfilled. We propose that the State Party of Slovakia should invite the joint World Heritage Centre and IUCN reactive monitoring mission, which would assess current and potential impacts of ongoing and planned forest management operation and hunting activities on the Outstanding Universal Value of the property and assess whether the property meets the criteria for inscription on the List of World Heritage in Danger.

Thank you for your time and attention to this matter.

Yours sincerely,

Viliam Bartuš
WOLF Forest Protection Movement
Head of the Eastern Carpathian Mountains tribe

Annex I: Logging in the area of Slovak components of the property from 2006 to 2016