

Bern Convention – Convention on the Conservation of European Wildlife and Natural Habitats

Priority of the Scientific arguments

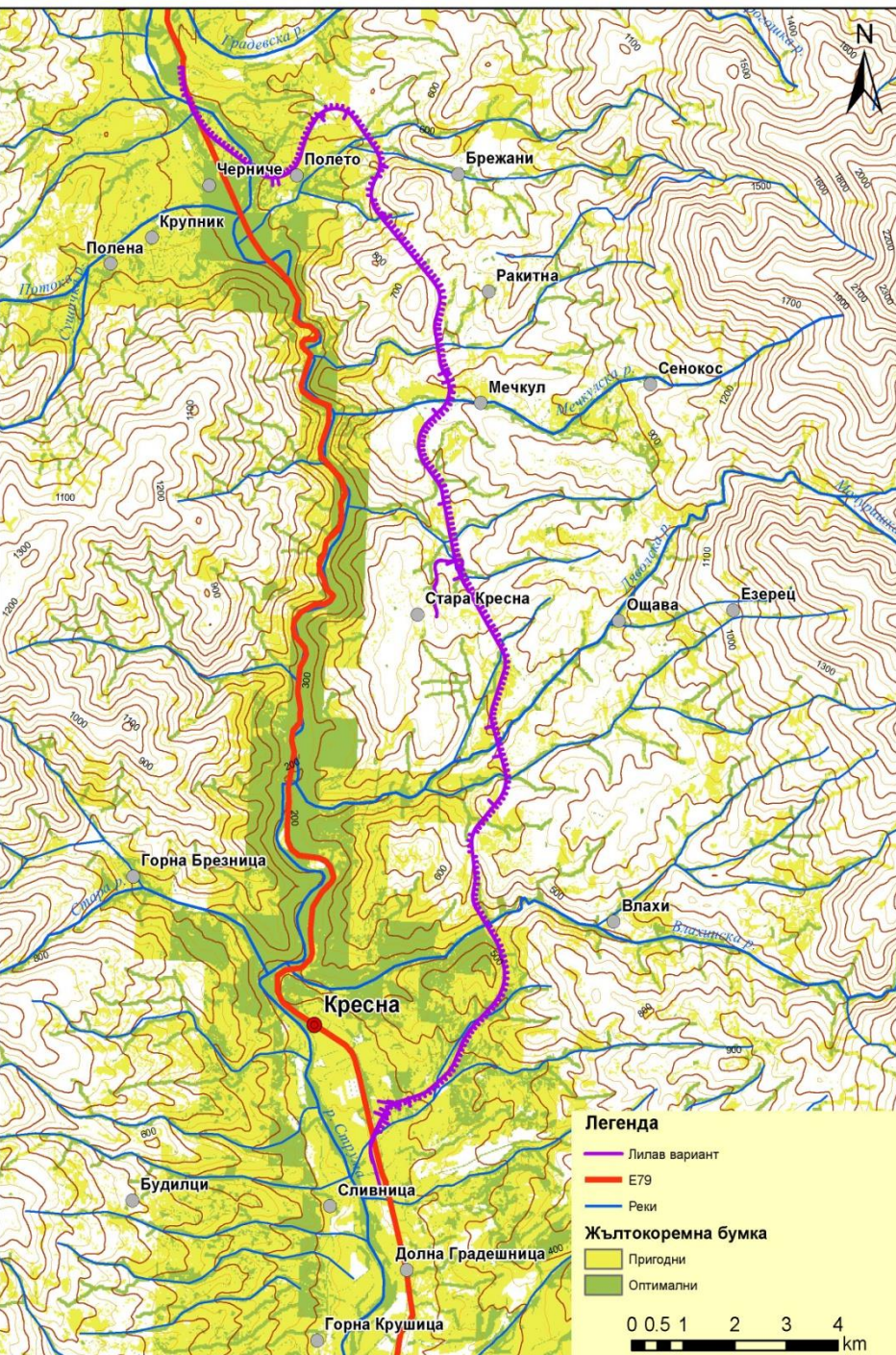
SAVE KRESNA GORGE!

Dr Stoyan Beshkov, National Museum of Natural History, Sofia

**How to save? - Motorway out of the
gorge! No even in one direction!**

IN WHAT WAY ? – OPEN A CASE FILE NOW!

Mitigations measures in the Gorge are not possible – this is opinion of more than **106 leading experts on biodiversity and of Nat. Museum of Natural History, Sofia. The only effective mitigation is **MOTORWAY 100% OUT OF THE GORGE!** This is also opinion of the Expert of the Bern Convention and Recommendation 98/2002.**



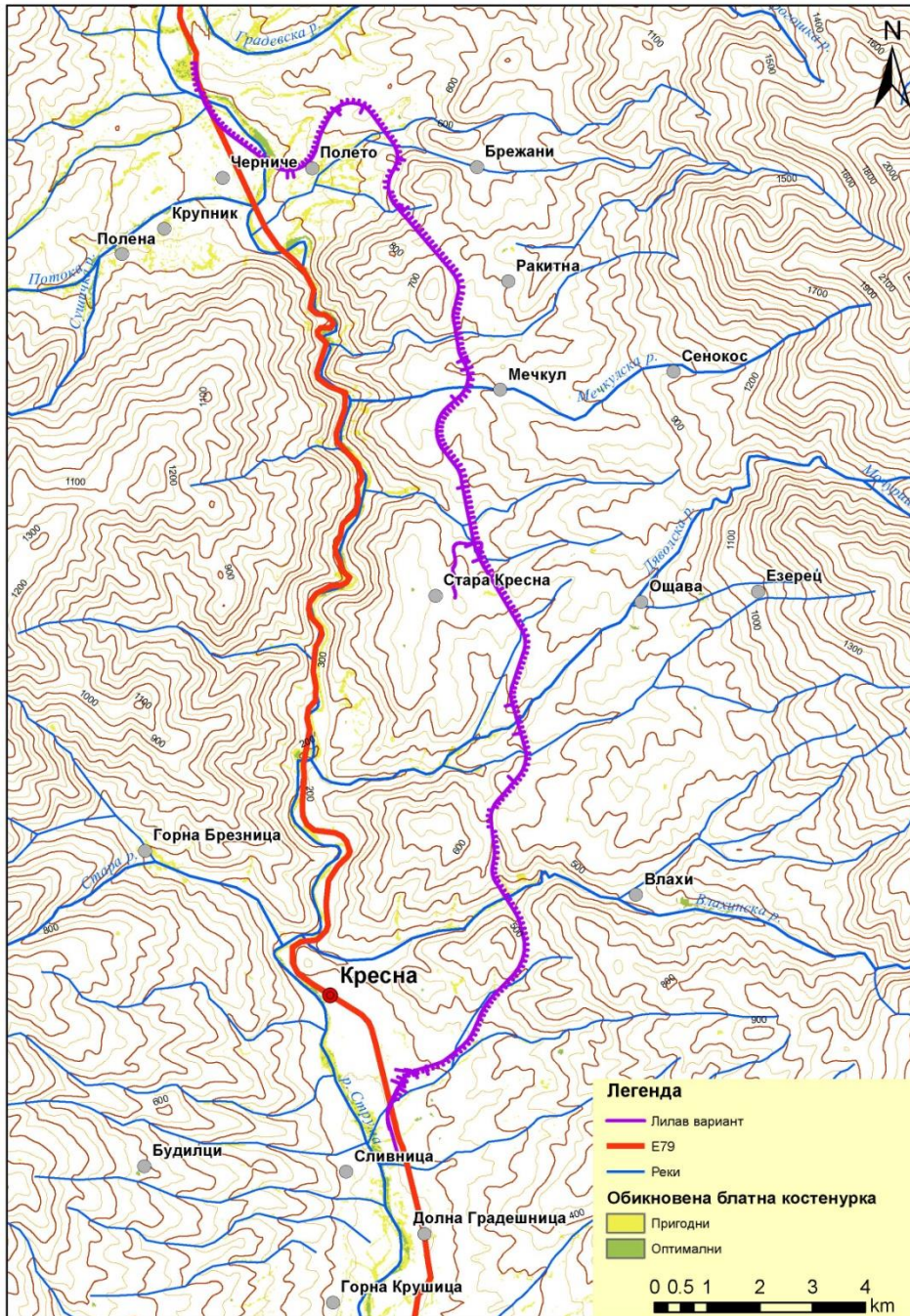
Why OUT OF THE GORGE?
 – Because of the **Scientific arguments!**

Directive species:
Bombina variegata, Res.6,
 GIS Model

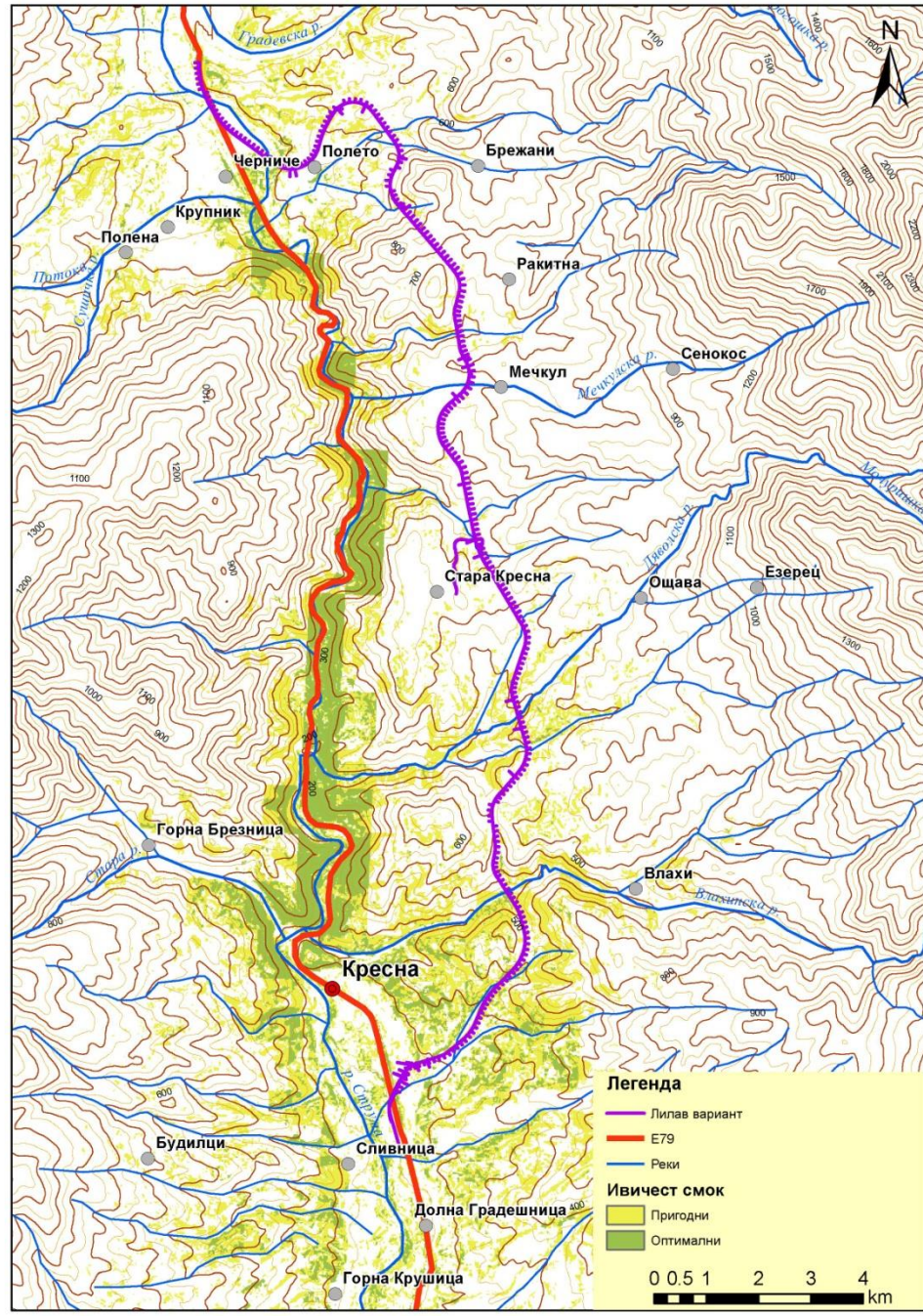
Red line – road in the gorge
Pink line – proposed one direction road (Eastern alternative)

Dark green – optimal (effective) habitats

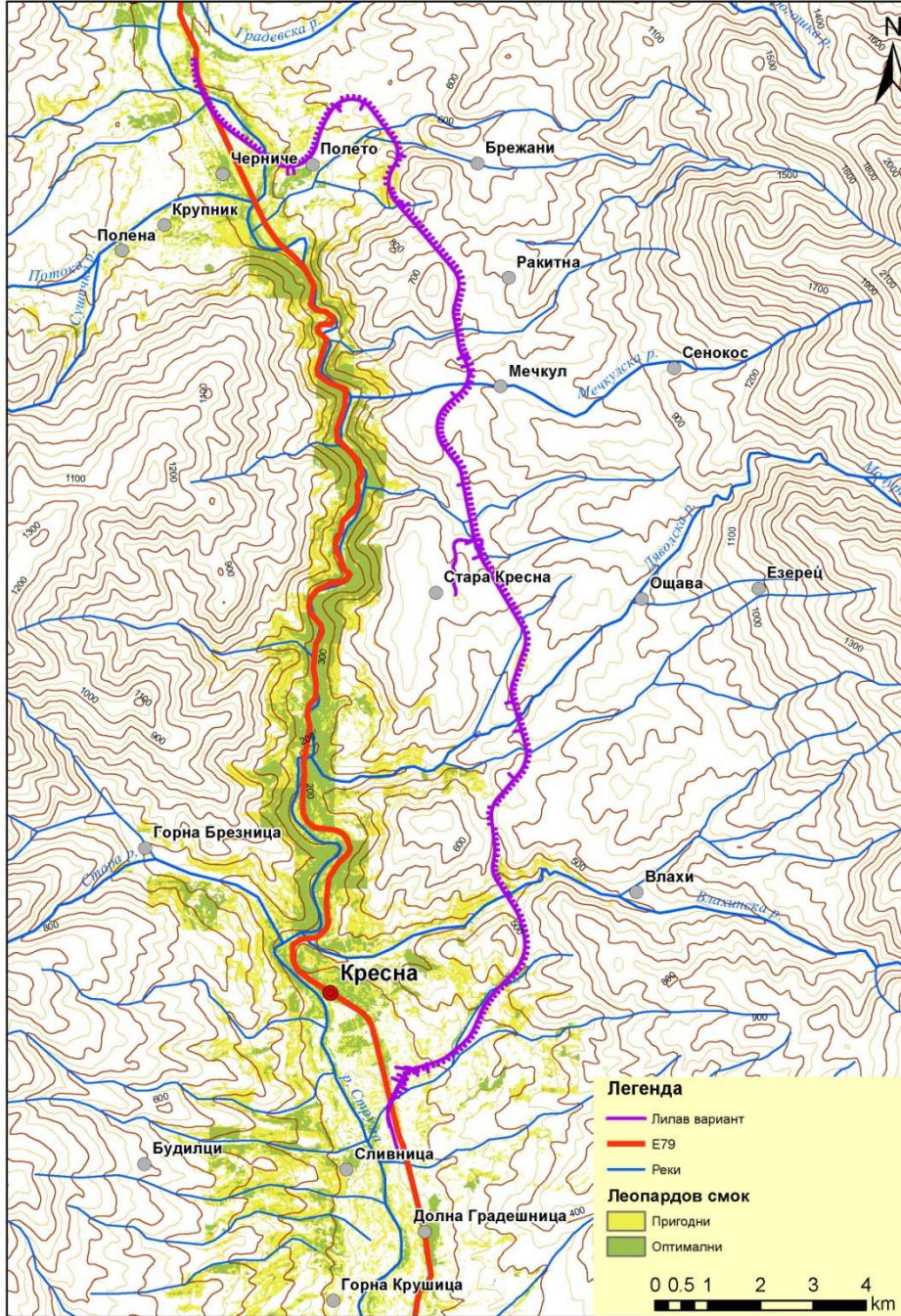
Light green – suitable (potential) habitats



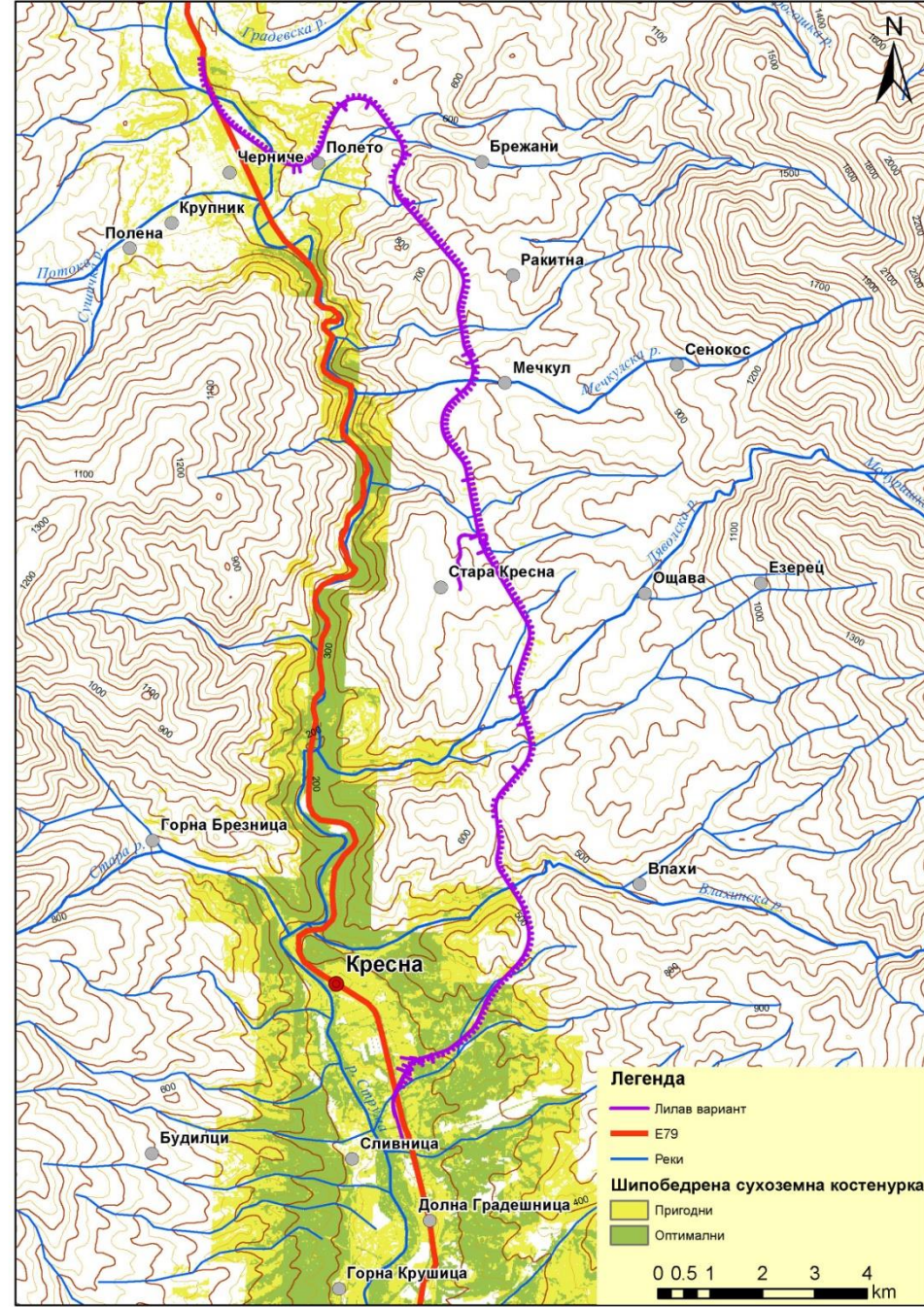
Emis orbicularis, Res.6



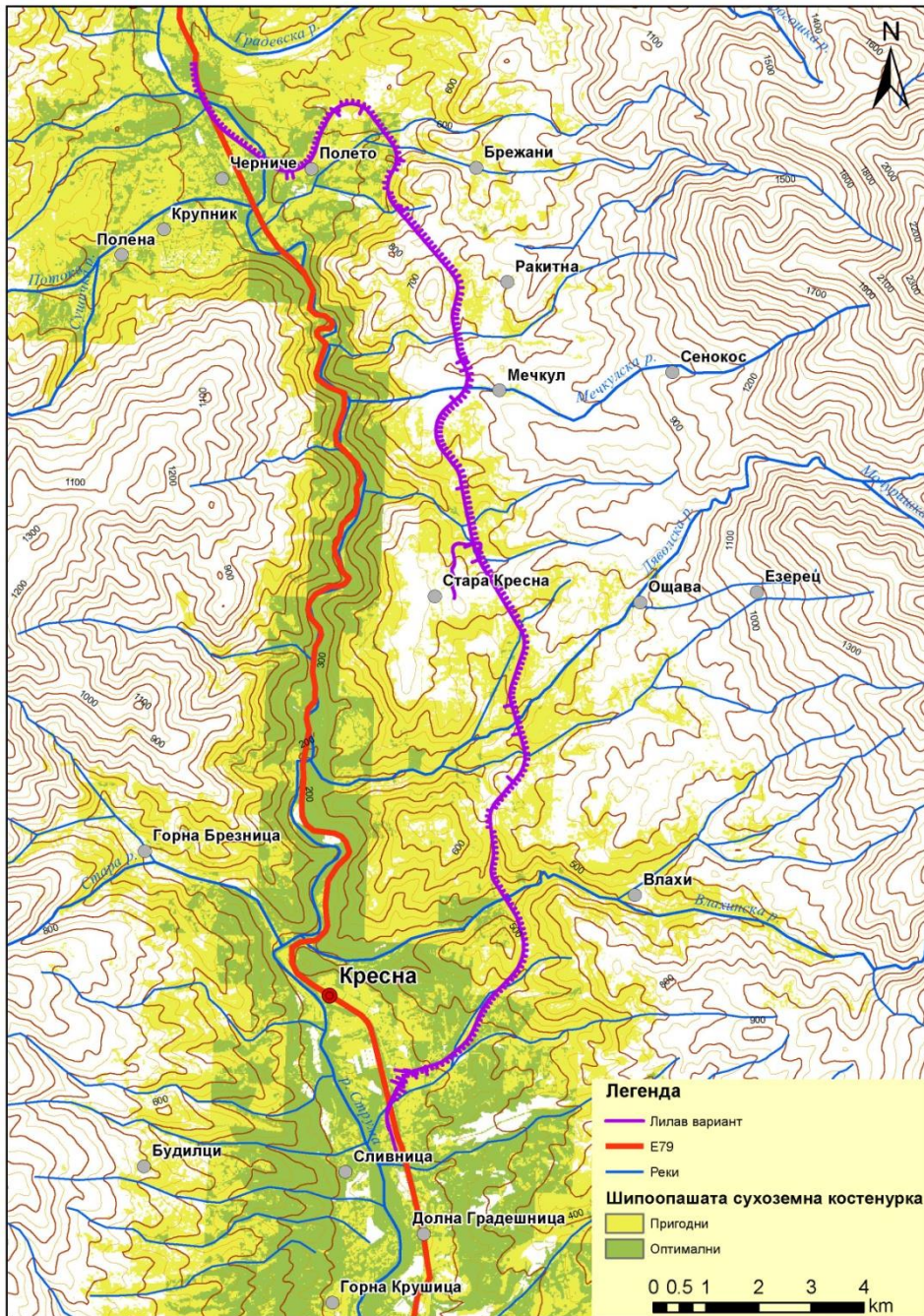
Elaphe quatuorlineata, Res.6



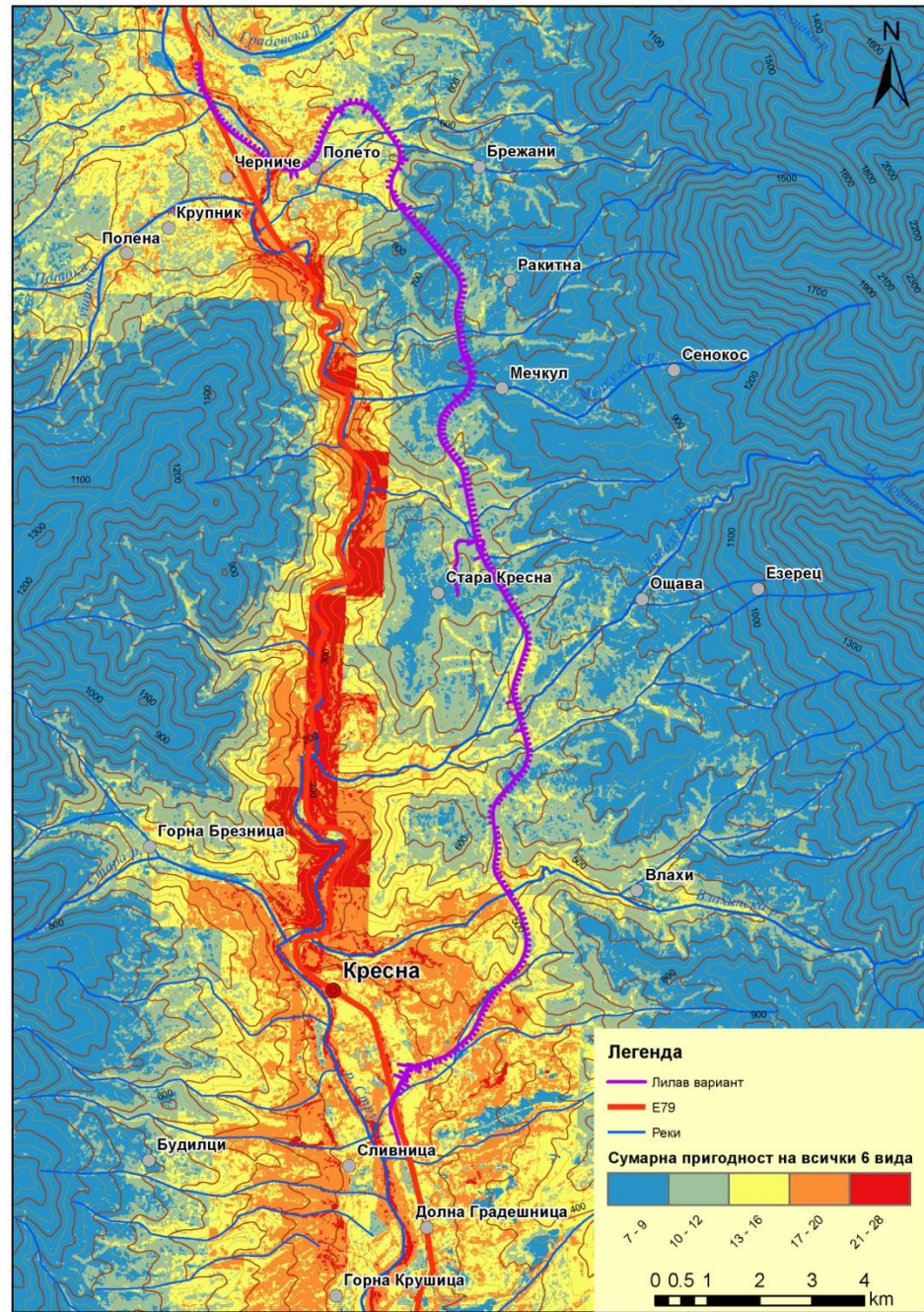
Elaphe situla, Res.6



Testudo graeca, Res.6

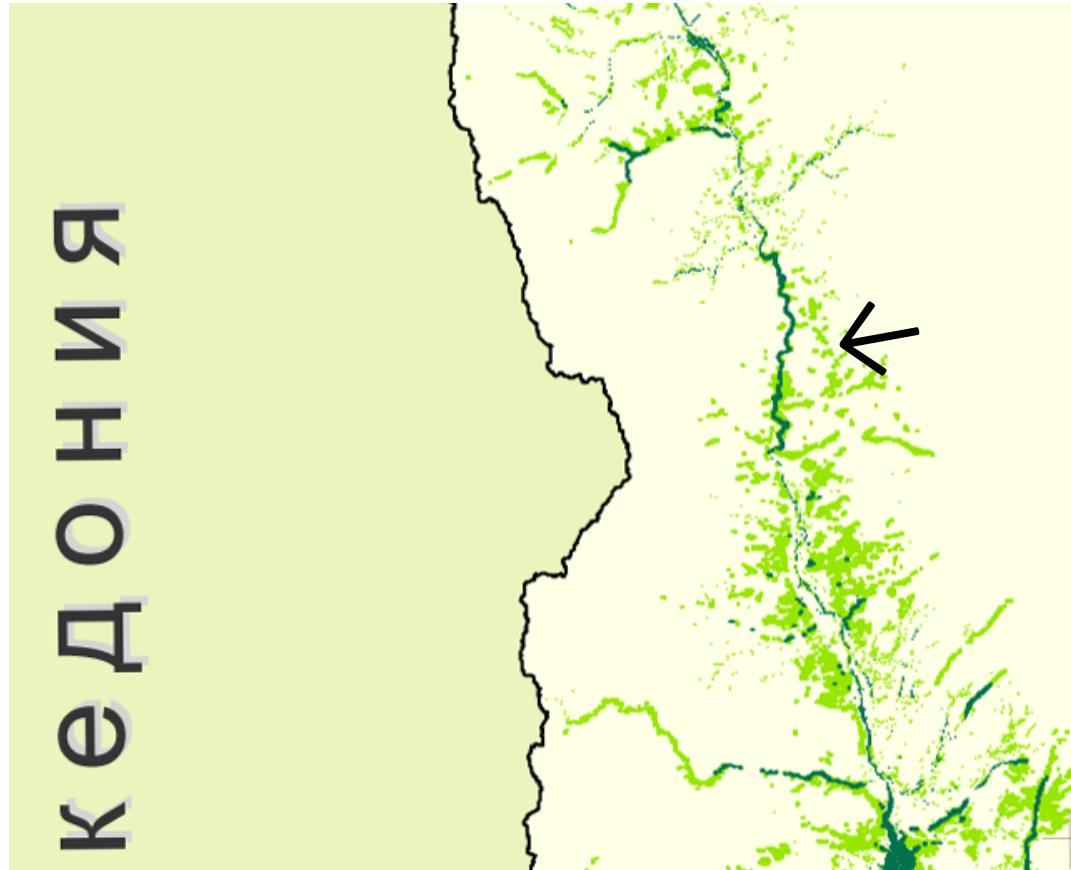


Testudo hermanni, Res.6



Total for Amphibia & Reptilia, Annex. II, 92/43

Same is the situation with other groups.
When The Facts Speak The Gods Remain
Silent!



Large Cooper – *Lycaena dispar*, another species from Annex II, EEC 92/43 HD
Source: MOEW

Letters of support from EU organizations:



**Butterfly
Conservation**

Saving butterflies, moths and our environment

Manor Yard East Lulworth
Wareham Dorset BH20 5QP
Tel 01929 400209 Fax 01929 400210
info@butterfly-conservation.org
www.butterfly-conservation.org



**COLIN PLANT ASSOCIATES (UK)
CONSULTANT ENTOMOLOGISTS**

14 West Road, Bishops Cleeve, Hertfordshire CM23 3QP
UK tel/fax: 01279 507697 mobile telephone: 07770 766416
E-mail: cpauk1@ntlworld.com

President Sir David Attenborough CH, FRS

Prof. Dr Stoyan Beshkov
Head of Invertebrates
National Museum of Natural History
Tsar Osvoboditel Boulevard 1
1000 SOFIA
Bulgaria

7th October 2016

Dear Dr Beshkov,

Proposed Motorway through the Kresna Gorge in Bulgaria

As you are aware, I am personally familiar with the Kresna Gorge and I have studied aspects of the Lepidoptera fauna there on many occasions from my first visit in 2002 to my last in 2015. In my opinion, the construction of a motorway through the Kresna Gorge in south-west Bulgaria would, without any doubt whatsoever, be an ecological disaster of international significance and should be resisted by all legal means available.

The gorge is a "European Hotspot" for invertebrates and it supports one of the largest and most diverse Lepidopteran faunas (butterflies and moths) to be found anywhere in the entire of Europe. That assemblage of species includes endemic forms (species not known from anywhere else in the entire world). The ecological requirements of a great many species resident in the gorge are such that both the physical destruction of habitat caused by building the motorway and the subsequent break in habitat continuity in this mountainous region will inevitably cause their complete loss. I have also seen published evidence that other invertebrate groups, as well as vertebrates, are of equal importance here.

I am not acquainted with any of the economic arguments for the new north-south road connection in south-west Bulgaria and beyond into Greece; one must assume that they are valid. However, it is abundantly clear that there is a viable alternative route for the road which is being ignored. The extremely high negative impact on the ecology of the entire Balkan Peninsula that will ensue as a consequence of motorway construction in the Kresna Gorge is contrary to both the spirit and the letter of the Convention on Biological Diversity to which Bulgaria is a signatory. It would, at the very least, bring shame upon the otherwise progressive and enlightened Bulgarian Government and may even, in my opinion, potentially contravene European Law.

Colin Plant Associates have many decades of experience as the leading UK organisation using invertebrates as a tool to undertake Environmental Impacts Assessment of major construction projects such as roads, railways and new towns. We are pleased to offer our full support to this enormously important campaign and you may feel free to use this letter in any way that you consider useful, without any fee.

Yours sincerely,

Colin W. Plant
Managing Partner

Associate Prof. Dr Stoyan Beshkov
Head of the Invertebrates Department
National Museum of Natural History
Tsar Osvoboditel Blvd. 1,
1000 Sofia, Bulgaria

7th October 2016

Dear Professor Beshkov

PROPOSED MOTORWAY AT KRESNA GORGE

I was extremely concerned to read your report on the threats to Kresna Gorge from the construction of a new motorway. Butterfly Conservation fully supports your document outlining the huge biological importance of the site and why it must be saved. It seems that other alternative routes are available and would be far less damaging to the biodiversity of Bulgaria.

Kresna Gorge is listed as a Prime Butterfly Area for Bulgaria due to its high richness of butterflies. Your report also shows that it is extremely valuable for a wide range of other species as well. Such areas are incredibly precious and to be conserved not only for the health of biodiversity but also for the benefit of future generations. Their protection is also important to follow the Convention of Biological Diversity to which Bulgaria and the EU are signatory.

I wish you success in protecting this important site and offer our full support in your endeavours.

Yours sincerely

Dr Martin Warren

Chief Executive

Printed versions available



Butterfly Conservation Europe
Postbus 506
NL-6700 AM Wageningen
The Netherlands
www.bc-europe.eu
info@bc-europe.eu

Dr Stoyan Beshkov
National Museum of Natural History
Tzar Osvoboditel Blvd. 1,
1000 Sofia,
Bulgaria

Wageningen, 7 October 2016
PROPOSED MOTORWAY AT KRESNA GORGE

Dear Dr. Beshkov,

With this letter Butterfly Conservation Europe wants to give full support to your report on the importance of the Kresna Gorge for butterflies, not only for Bulgaria, but also on a European scale. For this reason, the area is also listed as one of the Prime Butterfly Areas in Europe deserving species protection and conservation efforts.

As good alternatives are available, which are far less damaging to biodiversity and butterflies, we urge the Bulgarian government as well as the EU to stop the destruction of the Kresna Gorge and use the alternatives.

I wish you success in protecting this important site and offer our full support in your endeavours.

Yours sincerely,

Dr. C.A.M. van Swaay
Chairman of Butterfly Conservation Europe

A handwritten signature in blue ink, appearing to read "C.A.M. van Swaay".

Societas Europaea Lepidopterologica (SEL)



General Secretary
Dr Carlos Lopez Vaamonde
INRA Zoologie Forestiere
45075 Orléans – France
E-mail: lopez@orleans.inra.fr

17th October 2016

Re: Position Statement of Struma motorway through Kresna Gorge by scientists and experts in the field of biodiversity conservation

Dear Dr Beshkov,

With the present letter we would like to endorse the "Statement of Struma motorway through Kresna Gorge by scientists and experts in the field of biodiversity conservation".

The Kresna gorge is a well known habitat for rare butterflies and moths, valued very much by our members, many of whom visited the place for study. Indeed during the XVIIIth European Congress of Lepidopterology held in Bulgaria in August 2013 and organized by you, members of our society had the opportunity to visit Kresna Gorge and see by themselves its remarkable diversity of insects and plants.

We sincerely hope alternatives to the construction of the motorway through the Kresna Gorge will be found and the biodiversity of this remarkable site will be preserved for future generations.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Carlos Lopez-Vaamonde".

Carlos Lopez-Vaamonde
General Secretary SEL
<http://www.soceurlep.eu/>

Please, re-open the Case File and Save Kresna Gorge!

There is serious contravention of the Bern Convention!

POSSIBLE CASE FILE ON RECOMMENDATION NO. 98 (2002)

After the latest update sent to the Convention on June 15th, 2016, there has been a series of new developments around the Kresna gorge case and the Struma motorway project. As a result, and taking into account the current update on the case, the undersigned NGOs insist that the Standing **considers seriously the opening of a new file case and to adopt the following recommendation:** "The Bulgarian government strictly fulfils the provisions of Recommendation 98/2002 of the Bern Convention, guaranteeing the construction of the last section of the Struma motorway (that of the Kresna gorge) to be done using a route that diverts the traffic outside of the Gorge and turning the existing road into a local road, important for the local rural community. The project is implemented in close cooperation with the European Commission for securing joint financing for completion of the whole Struma motorway project using an ecological alternative. The European Commission commits to ensure the necessary funding for the realisation of such a measure and to create a mechanism for information exchange and civic monitoring of the project implementation".

Thank you for your attention!

