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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

33<sup>rd</sup> meeting  
Strasbourg, 3-6 December 2013

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**Specific Site - File open**

**Akamas peninsula  
(Cyprus)**

**REPORT BY THE NGO**

*Document prepared by  
Terra Cypria*



**OCTOBER 2013**

## **Report on Akamas**

### **Follow-up Report to the 33<sup>rd</sup> Meeting of the Standing Committee of the Convention on the Conservation of European Wildlife and Natural Habitats.**

by Dr Artemis Yiordamli, Executive Director, **Terra Cypria**, supported by **BirdLife Cyprus**.

conservation of the Akamas and Limni areas in Western Cyprus: Threats posed to wildlife by development near or within these areas.

**This report is presented as an update to the reports presented over the past years, and as an exposition of recent developments since the proposed SCI/SPA.**

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1. Summary
2. Background
3. Current situation
4. Action recommended

## **1. SUMMARY**

*The relevant case file should remain open as insufficient measures have been taken to adequately protect and/or manage the important wildlife of the Akamas Peninsula or Limni. The current Natura 2000 designations for both sites are inadequate and are the subject of investigation by the European Commission for increasingly worrying reasons.*

The **Akamas Peninsula** in N.W Cyprus, an area of 230km<sup>2</sup> is of exceptional ecological significance, and, inter alia, a nesting ground for the endangered green turtle (*Chelonia mydas*), while the **Limni coast**, further north, is an important nesting area for the loggerhead turtle (*Caretta caretta*). Both sites are in the western part of Cyprus, but separated by a strip of considerable coastal development. Plans for the protection of Akamas have been announced and discussed for years (but not implemented), and finally the status of both Akamas and the Limni coast, were left to be settled within the context of the Natura 2000 network, according to which Cyprus is obliged to designate key sites, as provided for by the EU Habitats (92/43/EEC) and Birds (2009/147/EC) directives. For both Akamas and Limni, the boundaries designated for Natura 2000 do not adequately protect the key species and/or habitats

The Standing Committee issued Recommendation no.63/97 inviting the Cyprus Government to grant the Akamas peninsula the status of a **national park**, or similar, and to take appropriate

protection measures on a number of issues. Two appraisals on-the-spot were conducted in 1997 and 2002. The second report (Ellul Report) identified that many of the measures proposed by the Cyprus Government for Akamas were **incompatible with sustainable management** and long-term protection.

The area designated as an SCI (Site of Community Importance) for Akamas now, and for Limni is so limited as to be catastrophic. **The Akamas designation is more limited than any previous government proposal over the last two decades**, and barely extends beyond the (already protected) state forest, thus leaving unprotected large areas of habitats listed in the Habitats Directive and species listed in the Appendices of the Bern Convention and in the Annex I of the Birds Directive. Formal complaints to Government were lodged by leading NGOs, Terra Cypria, BirdLife Cyprus and Friends of Akamas, as part of the complaints procedure envisaged in the Cyprus law. The complaints were rejected and the boundaries were finalised and submitted to the Commission in Feb 2010 after being **yet further reduced**. Formal complaints followed to DG Environment by various NGOs leading the EU Commission to send a formal notice to the Republic for inadequate designation (19.5.2011). Thus the adequacy of the SCI designation under the Habitats Directive is now under examination at European level.. Moreover, the Cyprus Government is in breach of Article 6 of the Habitats Directive requiring an appropriate assessment for plans/projects that might affect a Natura 2000 site, since the appropriate assessment is **NOT** currently applied by the Government to the areas outside the pSCI which should have been included. As far as the SPA designation is concerned, the European Commission has already sent a reasoned opinion to Cyprus concerning inadequate designation of SPAs, including Akamas. Meanwhile, extensive development has been taking place, including the erection of unlicensed, illegal premises, with mostly ineffective and dilatory actions to stop or remove them.

In Limni (known as the Polis-Yialia Natura 2000 site), the proposed management plan, although adopted, has not yet been given a legal status or been implemented. Even if it were, the area adopted is such a narrow strip of coast that it would be of limited benefit to the turtles it is supposed to protect, as there are major developments planned adjacent to the site.

These developments include what is possibly the largest golf and village complex in the Mediterranean. A permit has been granted allowing development beyond 270m from the shore, despite the minimum precautionary limit of 500m recommended by the Appropriate Assessment procedure as applied under Article 6(3) and 6(4) obligations of the Habitats Directive. This action poses a direct threat to the sea turtle conservation status both from direct lighting and sky glow effects. Also the pressure to create a touristic beach in the area where the turtles nest, to serve the residents of the development, will be devastating for the nesting beach.

Two earlier instances demonstrating the problem occurred in 2012. On the coast of Argaka village (see map at Annex A) the local authority purposely or in ignorance destroyed 45% of Habitat 2210, Embryonic shifting dunes, of the area. Within the Natura 2000 site of Polis-Yialia further habitat destruction was carried out by a private company exposing the turtle nesting areas to the adjacent road (see map and photos). In both cases no early warning system was in place and the government failed to prevent the damage from happening.

**Since Recommendation no.63 has not been observed or put into effect, and the EU Commission is considering the adequacy of these sites, and since real habitat damage is actually happening over the last years year, we urge that the file remains open.**

## **2. CURRENT SITUATION AT AKAMAS AND LIMNI**

### **Akamas**

The same area has been proposed by the Cyprus Government as an SCI (Site of Community Importance) under the Habitats Directive, and as a SPA (Special Protection Area) under the Birds Directive. As will be seen from the attached map, Annex A, the area proposed falls well short of the area envisaged by a World Bank Study (1995) or the recommendations of the EU-LIFE Natura 2000 Project (2003) or the IBA (Important Bird Area) Inventory. From a potential area of 230km<sup>2</sup>/23.000 ha identified by the World Bank Study, only 10.017 ha have been included in the terrestrial area of the current government proposal, of which over 7.000 ha correspond to the already protected state forest.

Although it is understandable that the decision should provide measures to support the village communities and their economies, the development zones proposed are excessive, thereby limiting the Natura 2000 site and degrading the landscape (contrary to the Ellul Report). The original issue of declaring the wider area into a National Park or Biosphere Reserve, which was the aim of the World Bank Study, and of your Recommendation no.63, has been totally ignored.

A very dangerous development is that the ban on building isolated homesteads in the “area west of the communities”, has now been withdrawn, allowing construction of isolated houses in all the natural areas of Akamas. So a policy which has degraded habitats in the rest of rural Cyprus is now extended to the Akamas Peninsula. Even more dangerous is the fact that article 6 of the Habitats Directive requiring appropriate assessment of plans or projects that may affect a Natura 2000 area, is not applied by the government in areas outside these designated as SCI. As a result several developments have appeared in the area eligible for designation with no environmental control from the Environment Department and the Game and Fauna Service who are the relevant authorities (see below).

The boundaries proposed exclude large areas of Akamas of great importance to breeding and migratory birds listed in Annex I of the Birds Directive and Appendix II of the Bern Convention, and large parts of habitats listed in Annex I of the Habitats Directive. These are mentioned specifically in Annex B to this report.

There is little evidence on the ground that development is being 'strictly controlled' as stated by the Government in 2012. On the contrary development of housing is proceeding rapidly and, in some places, is clearly damaging habitats listed in Annex I of the Habitats Directive such as *Olea-ceratonia* and *Quercus infectoria* woodlands, *Juniperus phoenicea* scrub, *Genista facellata* scrub, *Pinus brutia* forest and *Sarcopeterium spinosum* phrygana. The coastal-strip development between Polis and the Baths of Aphrodite has also dramatically increased the level of human disturbance on *Caretta caretta* breeding beaches outside the Natura 2000 site proposal, such as Latchi beach, and the 1 km long Asprokremmos Beach (where the Anassa Hotel is situated) Under the EU Directives there is nevertheless an obligation to protect these species. Yet no measures have been taken to prevent disturbance from encroachment. Noisy water sports are still taking place. Contrary to point 9 of Rec.63/97, the situation on the beach of the *Anassa Beach Hotel* (sun beds, water sports, mechanical cleaning, photo pollution), has deteriorated further. With the approval of the local authority sun-beds etc., remain on the beach day and night. ‘Quad bikes’ and sand flattening machines move back and forth on the sand at Latchi, and noisy beach parties are held at night.

Scattered housing development further inland is also impinging on areas of importance to breeding Rollers, *Coracias garrulus* and Bonelli's eagle, *Aquila fasciata* (qualifying species for Akamas Peninsula SPA). Licenced and unlicenced quarrying activities, near the villages of Kathikas and Drousia, are damaging *Cupressus* and *Olea-Ceratonia* woodland and causing serious disturbance to an important colony of Egyptian Fruitbat *Roussetus aegyptiacus*. The Government is in breach of Article 6 of the Habitats Directive in that it is not applying the ‘appropriate assessment’ procedure before allowing development.

In light of the above, it is clear that the currently proposed area is too limited to afford sufficient protection to habitats and species. The reason for this outcome is that, contrary to the requirements of the Habitat and Birds Directives, the boundaries for the area designated as a Natura 2000 site have been decided less on ecological grounds, and more on socio-economic ones, to satisfy local voters. Designating a small part of the Peninsula (mostly state forest) as a Natura 2000 site and some small satellite areas, does not meet the proposals of the Bern Convention’s Recommendation no. 63/97 for protection of the area, nor in this case, the Natura 2000 Guidelines concerning sufficiency and non-fragmentation of proposed sites. A formal notice letter has been sent to the Republic by the EU Commission for insufficient designation. Since the criteria for excluding the area are not scientific, they violate the Habitats Directive, and if it is finally accepted that the whole of the peninsula is ecologically significant, the Republic no longer has an excuse for not including the whole area in the Natura 2000 network

## The Limni Site.

The area from Yialia to Polis (see map Annex A), a major nesting site of Loggerhead turtles, has been included in the Natura 2000 network, known as the Polis-Yialia site. The area includes a 10 km long beach and the adjacent marine area. However, the terrestrial and marine areas included in the site have been reduced very significantly compared to the original proposals, and the width of the coastal area for which a depth of 500m. was foreseen, now is on average about 100m and in some places less. There are still no management measures in place. Development in the immediately adjacent area (in some cases 60m from the sea) has proceeded very rapidly on some stretches of the site, with no regulations to guide it in such a way as to minimise impact (e.g. lighting etc). The relevant provisions of the Town and Country Planning legislation included in the Countryside Policy appear to be receiving little attention, but even if they were, the Countryside Policy for Polis, does **not** include the Yialia area. Although an earlier Government's Report (2010) states that the area is protected under 'several national laws', protective measures are not actually implemented. On the contrary damage has happened to the dunes and the nesting ground and there is no early warning system in place to prevent it.

Following a tender award by government, a proposal for a management plan for the Polis-Yialia area (in the limited size proposed to the EU as a Natura 2000 site) has been completed but not put into effect.

A permit has been arranged to develop beyond the site what could be the **biggest golf course and villas complex in the Mediterranean**. Because of this, implementation of the management study, when it happens, and however good, is unlikely to effectively protect turtles either on land or in the sea. Specific problematic instances have been referred to, in the summary at 1 above.

### 3. Action recommended

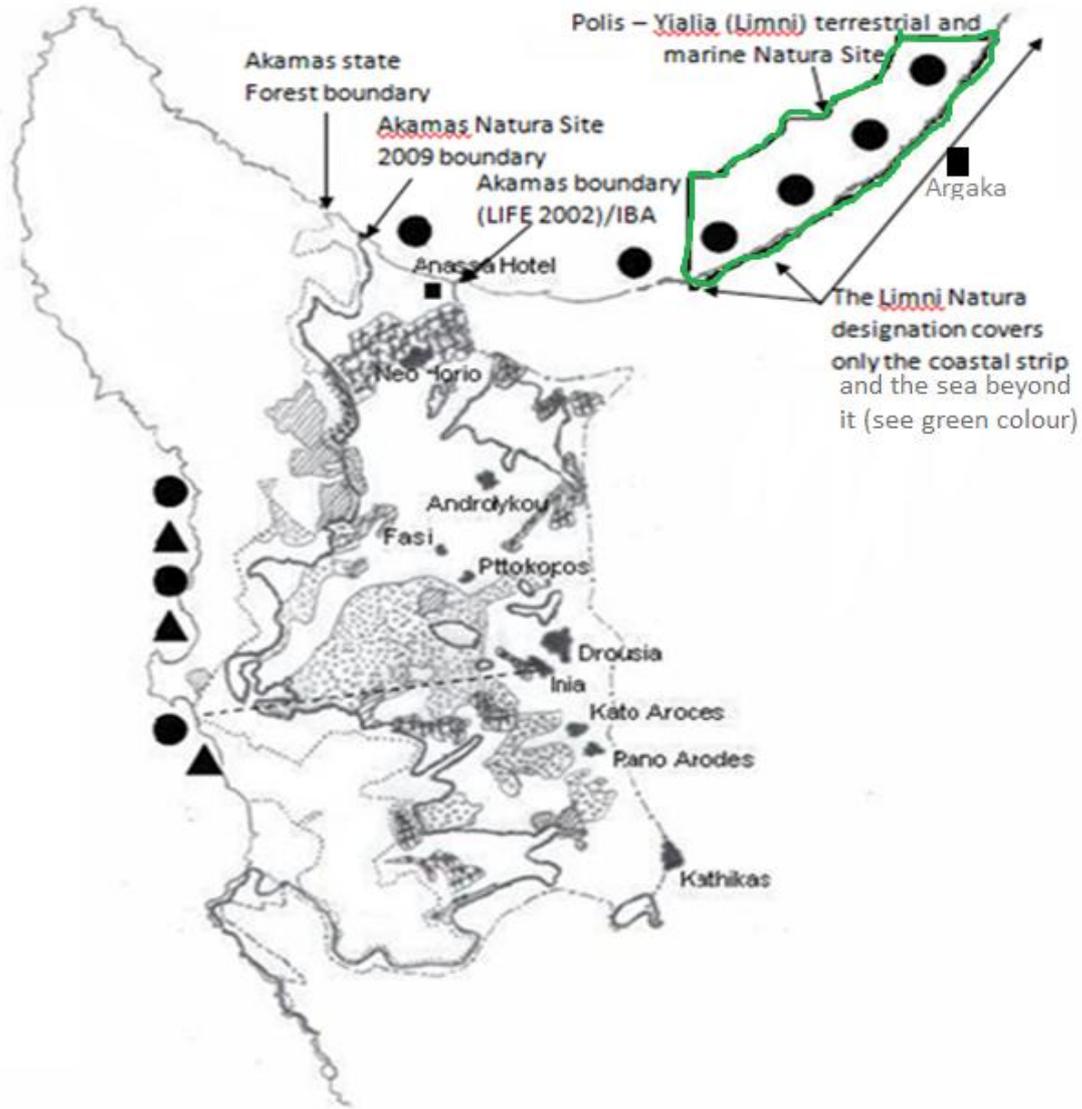
In view of the fact that turtle nesting at Limni, as well as the wildlife and biodiversity of Akamas continue to be under immediate threat, and all indications are that neither at the local, nor at the national level, are effective measures being adopted for conservation, monitoring and sustainable development in and around Akamas and Limni, we believe that patently inadequate Natura 2000 designations cannot satisfy the situation. We therefore, urge that *the file on this issue remain open*, so that monitoring of the situation can continue. At the same time your Committee should recommend to the Cyprus government that:

1. The proposed boundaries for the Limni site (Polis-Yialia Natura SCI site) should be revised to reflect realistically the area needed to provide protection to nesting turtles, and that regulating development in the adjacent area is urgent. This revision should be in accordance with the LIFE Project, 1998, *Special Areas of Conservation (Directive 92/43/EEC) in Cyprus* and the Habitat Map proposed therein for Polis-Yialia, no. CY4000001. Meanwhile measures for early warning concerning human interventions should be implemented.
2. The proposed development including Golf courses, houses and hotel to be allowed only from 500m from the shore, as the minimum precautionary distance, as recommended by the Appropriate Assessment procedure applied in accordance with the obligations arising under Article 6(3) and 6(4) of the Habitats Directive
3. The boundaries of the Akamas Peninsula site under the Habitats Directive should be revised to include the plateau villages (World Bank study as expressed in the *Local Plan for the broader Akamas Area (1989)* published by Government), while the site under the Birds Directive should be extended to adopt the BirdLife International IBA Inventory for the site. These designations should be followed by stricter control for especially sensitive areas within Akamas, and particular designations, where appropriate, to cover the village areas. (See e.g National Park/Biosphere reserve, etc)
4. A management plan of Akamas with all necessary measures for monitoring and control of habitats, including privately owned farmland habitats, should be elaborated with participation of all stakeholders, and implemented without delay.

5. In so doing, the provisions of the World Bank Study, the provisions of Recommendation 63/97, the Ellul Report and EU guidance for management of Natura 2000 sites should all be taken into account, especially concerning tourist activities on the coast, the proposed road connecting the villages, the proposed road from Inia to the coast, and the community centre on the coast.
6. Immediate and active measures should be taken against illegal constructions and against unsuitable activities on the surrounding beaches (see references to Anassa Beach and new constructions).
7. The Republic should immediately adopt an early warning system in order to closely monitor these areas, and the rest of the Natura 2000 sites, and prevent human destruction from taking place.

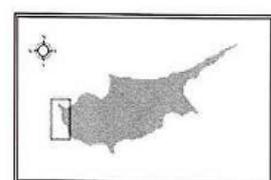
**Annex A**

**Map of Akamas Peninsula and Limni (Cyprus) and proposed Natura sites  
(Site of Community Interest, SCI, Habitats Directive and Specially Protected Area, SPA, Bird Directive for Akamas  
also Site of Community Interest, SCI, Habitats Directive for Limni (Polis-Yialia))**



**Legend**

- Boundary of area studied in 2003 by EU-LIFE coinciding approximately to IBA Inventory (Birdlife International)
- Latest proposed boundary (2009) for Natura 2000 (SCI)
- Isolated reserves given Natura status 2009
- ..... State Forest Boundary
- ..... Proposed road from Inia to coast (artist's rendition)
- Loggerhead turtle nesting areas (*Caretta caretta*)
- ▲ Green turtle nesting areas (*Chelonia mydas*)
- +++ *OleaCeratonia* woodland (9320)
- ▨ Grass pseudo-steppe with *Sarcopoterium spinosum* patches (6220/5420)
- ▨ *Genista fassellata* scrub (5330)



## Annex B

**Habitats and species insufficiently protected by the Cyprus Government proposal**

The following **habitats** have been insufficiently covered by the current pSCI, by excluding from the site boundaries large tracts of private land on which they were situated

- pseudo steppes with grasses and annuals
- *genista fasselata* scrub
- *sarcopoterium spinosum* phrygas
- *Olea* and *Ceratonia* forests

A significant stand of *Quercus infectoria* has been totally excluded.

**Species**

The following **mammals** are underrepresented and/or insufficiently protected

- o *Miniopterus schreibersii*<sup>1,2</sup>                      *Myotis emarginatus*<sup>1,2</sup>
- o *Myotis blythii*<sup>1,2</sup>                                      *Crocidura Cypria*<sup>1</sup>
- o *Rousettus aegyptiacus*

The following **reptiles** are underrepresented: *Caretta caretta*<sup>1,2</sup>, *Chelonia mydas*<sup>1,2</sup>

The habitat requirements of the following **birds** are not sufficiently covered by the SPA for the Akamas Peninsula:

- o *Aquila fasciata*<sup>3</sup> (the unique species of eagle that continues to nest in Cyprus)
- o Thirteen species of raptors passing over in large numbers during their migration ('bottleneck' migration site)
- o *Merops apiaster*<sup>1</sup>
- o *Coracias garrulus*<sup>1,3</sup>

The wider region of the Peninsula is very important for the birds of the island, particularly for the migratory species. A total of 170 species of birds have been recorded and Akamas provides a nesting area for 77 species of Annex I of the Birds Directive 2009/147/EU, and also for 99 other migratory and 16 other important species. The region is also a nesting ground for raptor species (*Aquila fasciata* and *Falco peregrinus*) and maintains important populations of the Roller *Coracias garrulus* and the endemic *Sylvia melanothorax*. In 2004 BirdLife Cyprus defined 19 Important Bird Areas (IBA) following the criteria and the well-recognised methodology of BirdLife International.

Although IBAs have been recognized by the European Court of Justice as a scientifically sound basis for the determination of SPA boundaries, this has not been followed in the case of Akamas.

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1: Strictly protected fauna species in Appendix II of the Bern  
 2: Protected under Annex II of the Habitat Directive 92/43/EEC  
 3: Protected under Annex I of the Birds Directive 2009/147/EC