



Standing Committee 44 meeting / Strasbourg, 2-6 December 2024



Open File No. 2017/2
Alleged negative impacts to Lake Ohrid and Galichica National Park candidate Emerald sites
due to infrastructure and urbanization developments
North Macedonia

Implementation of Recommendation 221 (2023) – point 1

Establish the legal basis for the whole Ohrid Region World Heritage site to be declared as a protected area with locations such as the candidate Emerald Network Sites and biodiversity hotspots nested as special protected areas within this wider scope.

NOT IMPLEMENTED ❌

- Law on Nature Protection already has an appropriate category – “Multipurpose Protected Site”;
- New (draft) Law on Managing WH proposed - none of the points is incorporated. Public hearing 07.02.2024 (organized at a request) – no reply to our comments to this day.



Destruction of the shore continues (also in previously untouched parts and close to/in biodiversity hotspots)

Implementation of Recommendation 221 (2023) – point 2



Destruction of the shore continues (also in previously untouched parts and close to/in biodiversity hotspots)

Establish a professional management body for the new World Heritage Site protected area, staffed with members of appropriate expertise and accorded in law with the power to make and execute management decisions.

NOT IMPLEMENTED 
WORSE THAN IN 2023

- New WH Management Commission - no representative from environmental NGOs and Biology Institute at the Faculty of Natural Sciences and Mathematics (violation of current Law on Managing the WH); Previously established expert consultancy body (which played a positive role) doesn't exist anymore;
- Draft new law for WH proposes a Council for Coordinated Management, the role remains the same (advisory); members primarily from central and local governments.

Implementation of Recommendation 221 (2023) – point 3

Conduct an expert evaluation with a public consultation procedure of both the Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029 and the Strategic Recovery Plan for Revitalization of Ohrid Region natural/cultural values to identify actual and potential weaknesses in their design and implementation, using the information gathered to upgrade each document.

NOT IMPLEMENTED ❌

Also no implementation of the MP and SRP and no such intention – government, MOEPP, Municipality of Ohrid didn't reply to any of our requests for implementation of the activities defined as their responsibility (violation of several laws); State Environmental Inspectorate with zero effect.



Removal of all objects in the lake and in close vicinity of Studenchishte Marsh is an urgent activity in both MP and SRP – none of the activities have been implemented; no monitoring body for SRP has been established.

From bad to worse: July 2024 – 82 platforms and constructions in the lake



Implementation of Recommendation 221 (2023) – point 4

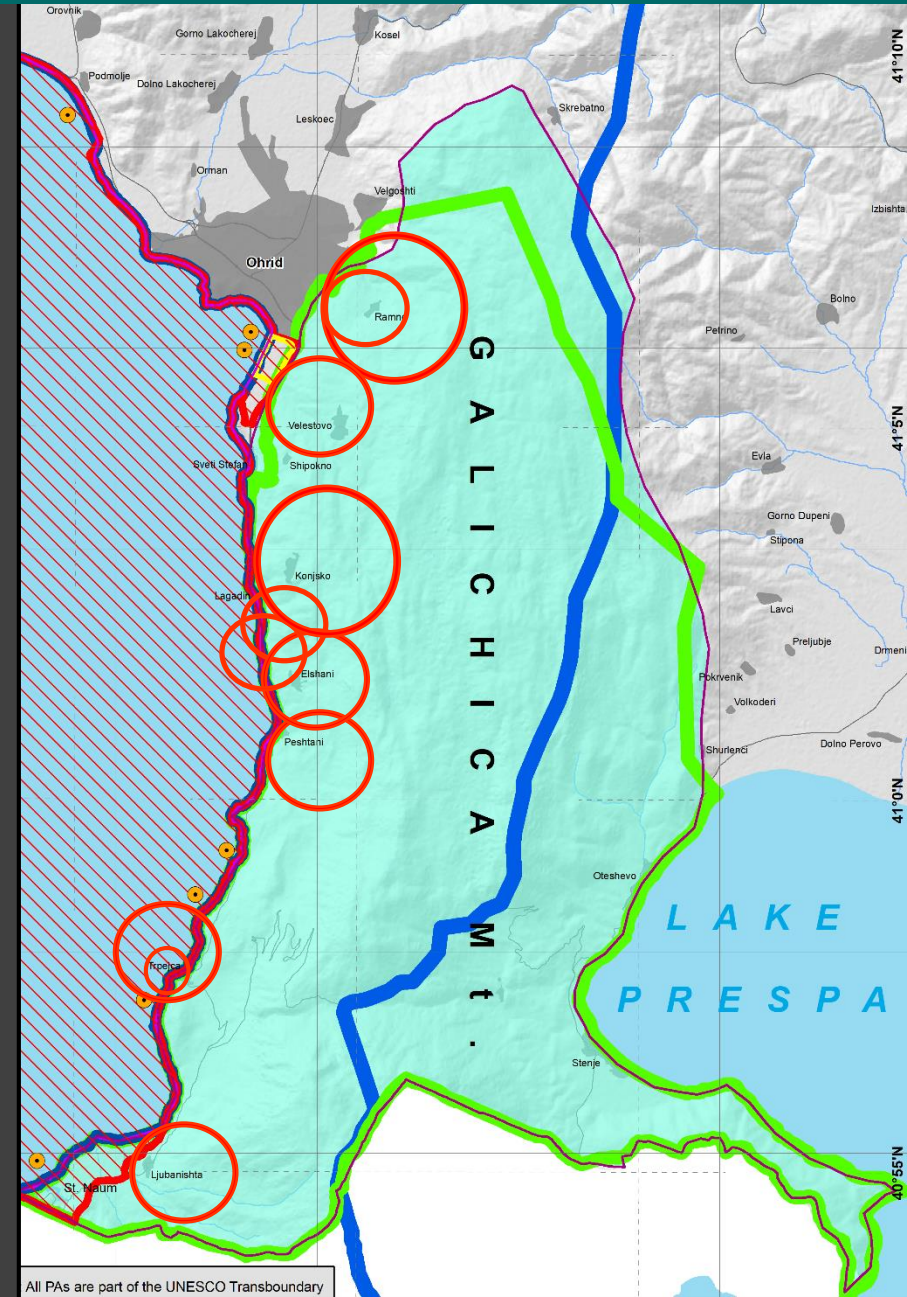


**NOT IMPLEMENTED ✘
AND SIGNIFICANTLY WORSE**

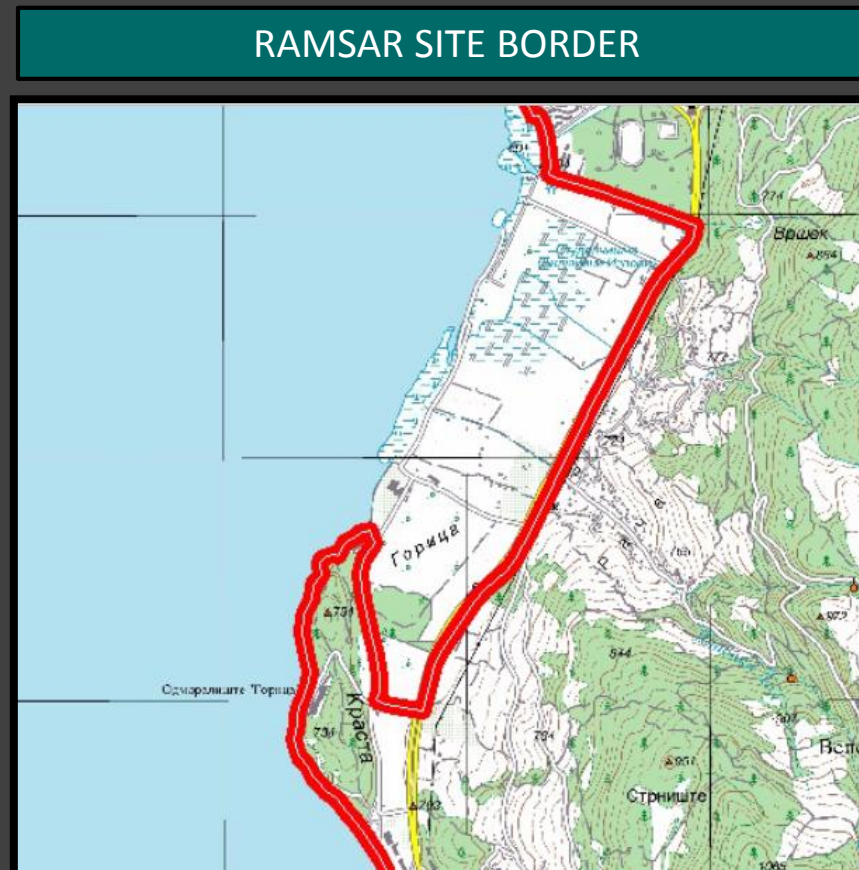
4. In conjunction with the evaluation of the Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029:

- a) complete up-to-date spatial and urban planning documents to ensure that all future constructions in the Ohrid Region are aligned with Outstanding Universal Value, including those for which unmaterialised construction permits and other related permissions have already been issued; and
- b) put in place an effective moratorium on all constructions, except for essential basic needs like wastewater infrastructure and emergency services, until Recommendations 3, 4a and 12 have been adequately completed.

According to the Official Journal of Municipality of Ohrid, published in May 2024, valid urban planning documents and projects, currently in a process of creation and adoption, include plans for further urbanization of all villages within NP Galichica.



Approximate overview of the area which will be urbanized if valid urban plans for Gorica area (published in Official Journal of M.Ohrid, May 2024) are implemented. Large part is within the Ramsar site.



RAMSAR SITE BORDER



If the urban plans and projects from the previous page are realized, this entire picture will be an urban area full of hotels, hotel complexes, apartment buildings, weekend houses, commercial facilities, infrastructure, etc.



New constructions continue to emerge; Municipality of Ohrid issued 157 new building permits in the period January-September 2024 (State Statistical Office).





April 2024: start of the construction of a huge new hotel complex based on an 2007 urban plan that should have been revised (obligation from WHMP and law). Construction permit issued in 2012 without environmental impact assessment (violation of Law on Environment). Our initiatives to State Environmental Inspectorate for both the urban plan and the illegal construction permit had zero effect.

*Picture taken on
18.07.2024*

Implementation of Recommendation 221 (2023) – point 5



Harmonise the legislation for urban planning and construction with nature protection laws to ensure that conservation of habitats and biodiversity are prioritised in protected areas and World Heritage sites, by placing stringent controls on definitions such as temporary buildings and urban equipment, by upgrading quality requirements for impact assessments in protected areas, and by eliminating potential weaknesses from overly extensive definitions of state importance that can allow construction of tourism development zones and hydropower facilities in the World Heritage site.

NOT IMPLEMENTED ✘ AND SIGNIFICANTLY WORSE

- On 13.08.2024 amendments to the Law on Urban Planning were adopted – no public consultations;
- Over 20 CSOs sent requests to the President not to sign the law - ignored;
- Invalid General Acts for Villages are valid again – adopted with no SEA.



The illegal hotel in Lagadin is nearly finished – with the old General Act it can become legal. UNESCO RMM 2020 specifically addressed its removal (recommendation 2d)

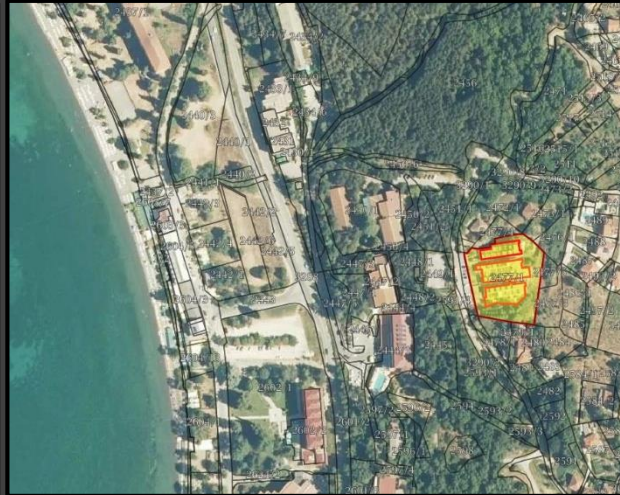
Implementation of Recommendation 221 (2023) – point 6



Establish a zero-tolerance policy for any new illegal constructions by streamlining the process for their removal in law, increasing the penalties for transgression of urban planning rules in World Heritage Sites, and reinvigorating the staffing, procedures and professional standards of relevant inspectorates.

NOT IMPLEMENTED AND SIGNIFICANTLY WORSE

- New illegal constructions continue to emerge all the time;
- Municipality of Ohrid legalized 87 illegal constructions in the period 01.01.2024 – 05.11.2024 (18 within NP Galichica, 19 close to the lake);
- Relevant inspectorates' actions in favor of the illegal constructions (our direct experience).



Some of the legalized illegal constructions within NPG and on the shore

17 July 2024: new Illegal construction of a large new hotel in the village of Ramne (National Park Galichica) is almost finished + smaller illegal building above.



In November 2024 we submitted a massive case of organized crime (42 documents as evidence)

**Ramsar site Studenchtishte
Marsh 18th July 2024:**

Development of a small urban area within the marsh, on illegally privatized public land.

All this was enabled by the actions and non-actions of local inspectors (for nature protection; construction and urban development), state inspectors (inspectionates on administration; construction and urban development; environment and nature protection), Ministry of Finance, State Attorney Office, etc.



Implementation of Recommendation 221 (2023) – points 7,8,13

7. Revise the proposed zoning concept as well as permitted and prohibited activities in the Valorisation Study for Lake Ohrid prior to the adoption of the Law for re-proclamation of Lake Ohrid as a Monument of Nature, as well as the Draft Management Plan for Lake Ohrid, to effectively address the actual threats, ensure protection and connection with Studenchishte Marsh and comply with international (IUCN) standards for protected areas.

8. Revise the proposed zoning and list of permitted and prohibited activities in the Valorisation Study for Studenchishte Marsh prior to the adoption of the Law on Proclamation of Studenchishte Marsh as a Nature Park and preparation of the management plan for the Marsh, to allow for the inclusion of a buffer zone covering the Gorica North area where new construction is not to be permitted, as well as to ensure connection with Lake Ohrid and compliance with international (IUCN) standards for protected areas.

13. Ensure that provisions allowing for construction and agriculture in the Studenchishte Marsh are removed from the final version of the Law on Proclamation of Studenchishte Marsh as a Nature Park, spatial/urban planning documents, and management plans, with narrow exceptions for traditional mowing and small livestock populations for habitat maintenance and restoration purposes.

NOT IMPLEMENTED ❌

Adoption of 2 laws (without revision of the studies or changes in the articles) prevented at the very last moment with a petition due to their unconstitutionality, sent by Front 21/42 to all relevant Assembly commissions. No action since. On 26.09.2024 seventeen NGOs sent a request for urgent implementation of the Bern Convention Recommendation (revision of the studies) to the Prime Minister and Minister of Environment – no reply to this day.

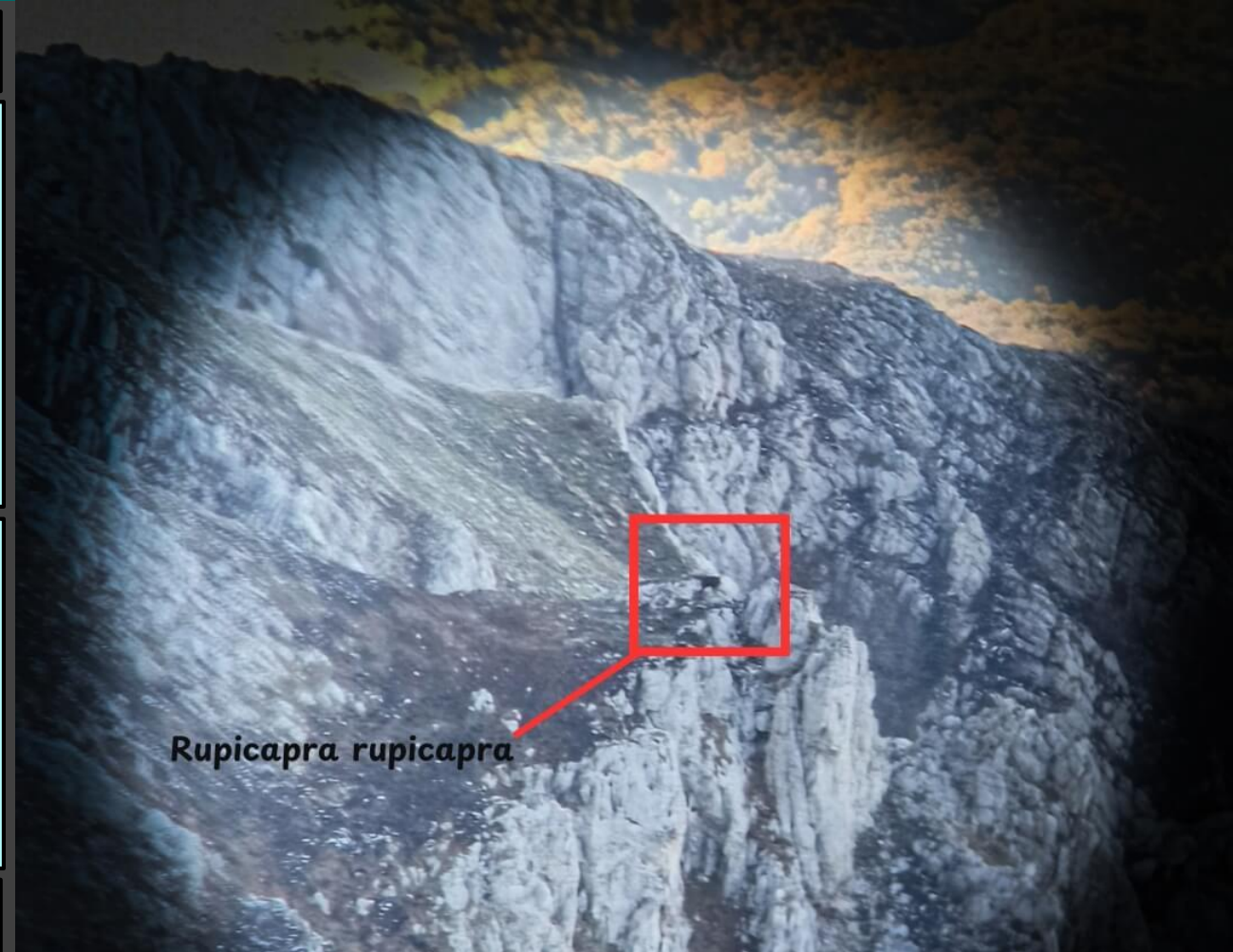
Implementation of Recommendation 221 (2023) – points 9, 10,11

NOT IMPLEMENTED ❌

9. Proceed to aligning each protected area in North Macedonia with the IUCN guidelines for 75% to be primarily managed for nature conservation, including by revision of permitted activities in line with the findings of this report, and establish a regular, annual mechanism for the delivery of state funds to protected areas for general management purposes.

10. Implement thorough monitoring of key species according to scientific principles throughout the World Heritage site, but particularly at biodiversity hotspots and core habitats, using the information to inform management decisions, national Red List classifications, and action plans for the conservation of endemic species.

11. Accelerate the procedures for the designation and full adoption of Emerald Network Sites and the establishment of a connected Network in accordance with the provisions of the Bern Convention and in cooperation with neighboring countries.



Rupicapra rupicapra

During the latest counting in November 2024 Macedonian Ecological Society (MES) detected only one *Rupicapra rupicapra* on the territory of National Park Galichica.

Picture by MES

Implementation of Recommendation 221 (2023) – points 12, 14

NOT IMPLEMENTED ❌

12. Urgently upgrade and expand the system for the collection, treatment and maintenance of wastewater in the whole of the Lake Ohrid watershed with a priority for action at the vicinity of biodiversity hotspots such as Saint Naum Springs.

14. Relocate and reimagine current and planned visitor facilities and restaurants at Saint Naum Springs, in particular facilities at the proximity of the Strict Protection Zone (especially the Ostrovo restaurant) and put in place improved mechanisms to control visitor volumes and flow, including appropriate paid entry.



Waste water pollution of St. Naum Springs from Ostrovo and other surrounding facilities clearly visible from above – picture taken on 18. July 2024.
State Health Institute pointed out the restaurants in St. Naum Springs area as a direct polluter of Lake Ohrid in the water quality report (July 2024).

Implementation of Recommendation 221 (2023) – point 15 and overall

NOT IMPLEMENTED ❌

Design and implement, together with the interested public and NGOs, a comprehensive awareness raising campaign on the importance, standards and methods of protecting the natural and cultural heritage throughout the Ohrid Region which should be recognised as a national treasure.

POINT 1	❌	
POINT 2	❌	⚠️
POINT 3	❌	
POINT 4	❌	⚠️
POINT 5	❌	⚠️
POINT 6	❌	⚠️
POINT 7	❌	
POINT 8	❌	
POINT 9	❌	
POINT 10	❌	
POINT 11	❌	
POINT 12	❌	
POINT 13	❌	
POINT 14	❌	
POINT 15	❌	

K. Kushevski

An underwater photograph showing a school of small, silver fish swimming in clear blue water. The fish are surrounded by green algae and seaweed. A vertical metal pole is visible in the background. The overall scene is bright and clear.

WE ASK THE STANDING COMMITTEE:

To keep the file open; Send a very strong message to the Government of North Macedonia; Rename the open file to “ Negative impacts to Lake Ohrid and Galichica National Park candidate Emerald sites due to infrastructure and urbanization developments”.

FRONT_{21/42}

Kushevski