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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

42<sup>nd</sup> meeting

Strasbourg, 28 November – 2 December 2022

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**Open File: 2017/2**

**Alleged negative impacts to Lake Ohrid and  
Galichica National Park candidate Emerald sites due  
to infrastructure developments  
(North Macedonia)**

**- REPORT BY THE COMPLAINANT -**

*Document prepared by  
Front 21/42*

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- October 2022 –

25.10.2022, Skopje

## **Bern Convention on the Conservation of European Wildlife and Natural Habitats**

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

### **UPDATE REPORT (01.08. – 25.10. 2022)**

#### **1. Law on proclamation of Studenchishte Marsh as a Park of Nature sent to the Assembly**

On 27.09.2022 the Government approved the final version of the Draft Law on Studenchishte Marsh and sent it to the Assembly for adoption. The approved version doesn't incorporate any of the CSOs comments. Primary management objective applies to only 33.89% of the protected area (8.85 % zone of strict protection, highly fragmented; and 25.04% is a zone of active management), there is no buffer zone – so there aren't any obstacles for the planned urbanization around the Marsh; Municipality of Ohrid is the appointed management body, which results in 2 different management bodies for the Marsh and Lake Ohrid, despite both being one Ramsar Site. The Ramsar Convention is not taken into account in any way. Our position is that the current Temporary Protection (valid until the new law is adopted by the Assembly) provides a more effective protection of Studenchishte Marsh, than this law. We are afraid that once adopted, the law will significantly reduce any chance for the much needed restoration of the marsh. The only hope now is that some MPs propose amendments during the adoption procedure.

#### **2. Draft Management Plan for St. Naum Springs area compiled**

The first draft of this plan was recently discussed at one of the WH Management Commission sessions. We are still in a process of initial reading and analysis, and these are our (very) first thoughts and conclusions: despite identifying tourism as one of the major threats for this sensitive area, the plan puts a significant focus on tourism development (not restriction); some of the recommendations from the SEA of the NP Galichica Management Plan, relevant for this area, are not incorporated, including the recommendation to dismantle the restaurant platforms and restore the natural site in its authentic form, restrict/forbid sailing tours around the springs; a large part of the land is owned by the Macedonian Orthodox Church, which expressed a keen interest to open for tourism development highly sensitive areas that are now forbidden for tourists, also to establish a new camping site; urbanization is defined as a major threat, but no specific actions are envisaged for elimination of this threat; several new scientific studies are proposed, as well as a modification of the zoning (but with no specifics at this point); a programme for invasive species is proposed, which we find a very positive step. In general we are worried about further tourism development in an area where it is already a major negative influence on the natural values. The WH Commission had many remarks for the first draft of this plan and there was a proposal to establish a working group which will assist NP Galichica in the development of this plan. The National Park staff made it clear that they are open for comments and suggestions from all stakeholders, which is also a very positive aspect in this early phase.

#### **3. Draft Strategic Rehabilitation Plan for the World Heritage with major issues**

*IMPORTANT NOTE (26.10.2022) – on 25.10.2022 a new draft version of this plan was published. Since we sent this report on the same day it was not possible to include any comments for this version. Upon very first check of the proposed activities we noticed many changes from the version commented below, the general conclusion is that some of the comments we (Front 21/42) and Ohrid*

*SOS gave during the informal consultations were incorporated. This still remains to be properly analyzed though.*

On 30.09.2022 there was an online meeting for the first draft of the Strategic Rehabilitation Plan for the World Heritage, followed by a second meeting on 13.10.2022 (at Front 21/42 request, due to a very short period of 3 days given for analysis of this document, prior to the meeting in September).

This plan derives from the WH Committee Decision 44 COM 7B.77 (“Urges the two States Parties to develop a detailed Strategic Recovery Plan with an associated phased action plan that sets out clearly defined aims and outcomes to mitigate threats to OUV with a set of agreed actions including a timeframe both in the short and longer term as well as a phased action plan, based on the full recommendations of the 2020 mission, and which would provide an overarching transboundary political and institutional framework for addressing the severe and multiple threats facing to the property; and to present the **Strategic Recovery Plan** to the Advisory Bodies and the World Heritage Centre in February 2023).

We have many major concerns about this plan, some of the most significant are:

- Instead of a plan that will focus on the actual (specific) values that are in urgent need of restoration, we have another bureaucratic document, with no data, analysis, actions, indicators, etc. relevant for the specific values. Besides many pages of vague phrases, found in several other documents, the draft plan has an Action Plan, which is **to a large extent a selection of already envisaged actions in the WH Management Plan, but with new timeframes**. Considering the fact that the Law on Managing WH Ohrid Region stipulates mandatory implementation of the WH Management Plan, this new (Strategic Rehabilitation) plan will not only cause a legal chaos (which deadlines will be valid – the ones in the WH Management plan, or the new, prolonged ones?), but in a way it legitimizes the non-implementation of the Law on Managing WH Ohrid Region and presents it as “a fulfillment of UNESCO’s Decision”. Following this logic, if this plan is not implemented, a new one (with a different name) can be compiled, with new deadlines for the same actions, and the continuing legal breaches will be (again) presented to UNESCO as a prove for the “serious dedication to the preservation of the World Heritage”. It is worth noting that the “copy-paste” from the WH Management Plan was also carefully done and omitted several crucial actions, among which are the new and effective Law on Managing the World Heritage; the Bylaw for allowed activities in each zone of the World Heritage (envisioned as a tool for urban planning); demolition of illegal constructions with valid decisions for demolition; etc.;
- Some “actions” for implementation of the recommendations of the Reactive Monitoring Mission in 2020 do not take into account the reality of the current situation, which turns them into empty phrases with no meaning. For example, the plan proposes a working group to be formed for alternative routes for the Corridor 8 railway, while in reality (according to the Government official statement) the project documentation for the railway is finalized (for at least a year) and discussions for its funding are on-going. The same action is proposed for the Corridor 8 highway – for which, not only the project is finalized, but there is a company for its construction (Bechtel and Enka) and even a specific law, which among other issues, stipulates that other laws can be breached for the construction of the highway. There are several examples of this kind.

When it comes to the implementation of the most painful recommendation for urgent moratorium on any new constructions, the plan envisages “update of the municipal decisions for a moratorium” (which are no longer valid) – RMM2020 comment for these decisions was that, considering the exceptions they contain, they cannot be considered as a fulfillment of the recommendation for a moratorium on any urban and coastal transformation. And yet, the Rehabilitation Plan suggests their revival, with no specifics as defined in the RMM 2020 Report;

- Even the very few positive actions are nothing but implementation of existing laws, or better yet actions to stop the ongoing legal violations. For example it is proposed to demolish the raft floating restaurant in St. Naum Springs, which is illegal anyway and continues to exist without

the mandatory permits and despite the request from NP Galichica for demolition and restoration of nature in its original state. The Rehabilitation Plan doesn't propose any specific steps for nature restoration, with indicators, timeframe, etc. – instead it presents a basic non-violation of existing laws as a rehabilitation action. The same can be said for another seemingly positive action – the proposal for revision of the existing GUP for Ohrid, Studenchishte Marsh part. While it is needed in order to remove the location for a new marina envisaged within the marsh in this plan, it's important to note that national laws stipulate that new GUP should have been adopted a decade ago! The Rehabilitation Plan also proposes a ban for any construction within Studenchishte Marsh, but has doesn't mention, nor take into account any of the urban plans for its immediate surrounding;

- The proposed monitoring of the implementation of the plan mainly comprises of already seen and proven ineffective means: 1 several bodies/subjects responsible for monitoring, without defined responsibilities, reporting practice, even without any monitoring and reporting plan (what will be monitored, in what way, by whom, what are the verification means, etc.) – this method was applied in the WH Management Plan and it contributed to its non-implementation; the WH Management Commission is one of the proposed monitoring bodies – the same body that should coordinate and monitor the implementation of the WH Management Plan, which has no coordination, nor monitoring; a new public oversight hearing for Ohrid Region is proposed as another monitoring mechanism – the first public oversight hearing for the World Heritage had literally zero impact, none of the conclusions have been implemented, including the ones the Assembly adopted for its own members. However, this did not stop the creators of the report to UNESCO to point it out as one of the proves for the country's serious dedication to the preservation of the World Heritage; the Government (special commission) is another proposed monitoring body – based on our direct experience working on the preservation of Ohrid Region since 2015, there is not a single reason to trust the Government. The most accurate indicator of the Government's dedication to the preservation of Ohrid Region, is in our view, the fact that it keeps the new Law on Managing WH Ohrid Region locked in a drawer for over 3 years, after it failed to influence an adoption of a new version of the law tailored for ineffective management (and after it falsely presented to UNESCO the old version of the law); The 4<sup>th</sup> monitoring body proposed in this plan is the Bilateral Lake Ohrid Watershed Management Committee – another (so far) meaningless body, that since its creation in January 2020 had 2 meetings (1 of which was constitutional). The only new subject mentioned in the Strategic Rehabilitation Plan is the State Audit Office, which, in our opinion is one of very few truly professional institutions/bodies in the country, but the problem is that there are no mechanism for mandatory implementation of their findings and recommendations. A good example is the State Audit Office report on the legalization of illegal constructions in the country – they found many irregularities and issued many recommendations, which to this day remain non-implemented by the municipalities, without any consequences.

It's important to note that the same people participate in many of these bodies, as well as in the working group which created this Rehabilitation Plan. In other words, some of the people who wrote the plan as members of the working group, will evaluate the plan as members of the WH Management Commission, will monitor its implementation also as members of the WH Management Commission (and possibly of some other proposed monitoring bodies, like the Bilateral Committee), will write the country's report to UNESCO (and report on the implementation of the plan), and finally will evaluate and give positive opinion for this report, as members of the WH Management Commission and National UNESCO Commission.

To sum it up – our position is that the proposed Strategic Rehabilitation Plan doesn't add anything to the documents and laws which already exist, except that it proposes new deadlines for activities that are envisaged in the WH Management Plan; it doesn't define any specific outcomes for the state of the OUVs (as noted in the WH Decision); has no monitoring plan and doesn't have any indicators for the actual rehabilitation (or recovery, as stated in the WH Decision) of the specific values which make Ohrid Region a world heritage site (e.g. the biodiversity index – specific species and their

habitats, mentioned in the nomination dossier, are not considered in any way in the Rehabilitation Plan).

We think that a completely new approach (concept) is urgently needed for a very different type of a Rehabilitation Plan, written by relevant experts. Considering its main goal – to recover the affected values (for the natural heritage it would be the specific species and habitats, the landscape, etc.) we think that this plan should include objective analysis of the current state of the specific values, desired state of conservation, actions to achieve this desired state, means of verification and precisely defined monitoring and reporting plan (done by trans-boundary independent body of relevant experts, as well as local communities and NGOs' representatives). The Strategic Rehabilitation Plan should also, in our opinion, inform all other plans, strategies, etc. – in other words, all other plans, strategies, etc. should be in the function of the recovery of the OUVs of the property, so far twice assessed by the IUCN and WH Centre as “fulfills the criteria of a world heritage in danger”.

Having written all this, we do want to note that it is a draft document, still in a process of creation/adoption – the formal public consultations started today (25.10.2022) and will last until 25.11.2022.

#### **4. Another set of legalization of illegal constructions, including ones in the 50m of lake shore and NP Galichica.**

During September and October (until 25.10.) Municipality of Ohrid adopted decisions for legalization of 46 illegal constructions within its territory. Of special concern are 5 illegal constructions that are both in the 50m lake shore zone and NP Galichica. MoE gave positive opinions for these legalizations (1 in 2013, 1 in 2018 and 2 in 2022), one was legalized without any opinion from MoE. This is a perfect illustration of the effect of the prolonged Law on legalization of illegal constructions, as well as MoE's role (considering the fact that the law stipulates legalization within protected areas only with a positive opinion from MoE).

#### **5. Alarming discoveries about the SEA reports for various urban and other plans within Ohrid Region**

Following the WH Management Commission's discussion about the very low quality of the SEA reports for various plans within the World Heritage site, for which the Ministry of Environment continues to give positive opinions, MoE organized a meeting for this subject, to which we were also invited. We consider this meeting to be a very positive step from MoE, but the things we learned during the meeting are quite alarming: MoE representatives stated that they don't evaluate the substance of the SEA reports, but merely check if the reports contain all the parts (titles) defined in the relevant law and bylaw; we learned that almost none of the experienced SEA experts agrees to work on SEA for Ohrid Region, most of the reports are conducted by experts who recently passed the SEA test and obtained a license; nevertheless, the position of the responsible MoE representatives who evaluate the SEA reports, is that they are not experts and therefore not in a position to evaluate the work of experts who know best; we were also surprised by the lack of knowledge and understanding of the relevant legislation which regulates SEA in general and specifically SEA reports for WH Ohrid Region. Last but not least, we find it quite worrying that only 2 people evaluate all SEA reports (over 300/year). Taking all this into consideration (and other issues discussed during the meeting), it is no surprise that low quality SEA reports, especially for the urban plans within the world heritage site, with many legal breaches, are produced and adopted.

**6.** We recently discovered that the final version of Lake Ohrid Valorization Study (adopted by the Government) allows speeding boats and scooters in the lake, unlike the previous publically available version, which envisaged a ban for these types of boats, defined as a high threat. The study, as well as the new law for proclamation of Lake Ohrid as a monument of nature haven't been a subject of public consultations yet, so there is still a space to (hopefully) influence this and other provisions.

Respectfully,

Iskra Stojkovska

Executive Director, Front 21/42

- August 2022 -

31.07.2022, Skopje

## **Bern Convention on the Conservation of European Wildlife and Natural Habitats**

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

### **UPDATE REPORT (19.02. – 31.07. 2022)**

#### **1. NEW DEVELOPMENT STRATEGIES FOR MUNICIPALITY OF OHRID WITH NO SUFFICIENT TIME FOR PUBLIC CONSULTATIONS**

On 15.02.2022 the Municipality of Ohrid published Draft Tourism Development Strategy with Action Plan 2020-2025, with Draft SEA Report, and Draft Rural Development Strategy 2022-2027, also with related Draft SEA. The public consultations period for all 4 documents was 30 days, this period also overlapped with the public consultations for the Draft Law on proclamation of Studenchishte Marsh as a Park of Nature. The public had one month for 2 strategies, 2 SEA reports and 1 law. Even though it is (purely formal) implementation of the law and Aarhus Convention, in reality we didn't have even remotely sufficient time to prepare for meaningful participation in the creation and adoption of all these documents. Such practice was also opposite to UNESCO recommendations and decisions referring to civil society involvement and inclusion of the community in the decision-making processes and management of the site (RMM 2017 – Recommendation 11; 2019 WH Committee Decision 43 COM 8B.9; RM 2020 – Recommendation 8a).

Front 21/42 submitted appeals asking for additional time for public consultations, which were rejected by the Municipality of Ohrid. Following this, on 20.05.2022 we submitted 2 lawsuits to the Administrative Court. At the time of writing this report we don't have a ruling from the court yet.

##### **1.1. Draft Tourism Development Strategy with Action Plan 2020-2025 and related Draft SEA Report**

Draft Tourism Strategy proposes 7 development zones<sup>1</sup>. One of our main concerns is the “New Town” development zone – Studenchishte Marsh is within this zone and the activities proposed as “opportunities for investments” include urbanization and construction of a new marina. Almost half of the entire budget for implementation of the strategy is proposed for the project of a new marina in this development zone.

Even though, the Draft Strategy doesn't explicitly propose a new marina within the marsh, or in its close vicinity, and the reply to our comment was that “the Strategy doesn't envisage a new marina within Studenchishte Marsh, nor an urbanization of its surrounding”, several points lead to the conclusion that this possibility is not excluded: there aren't many areas suitable for a marina in this zone; the SEA states that the location of the new marina should be in compliance with the Ohrid General Urban Plan (current GUP envisages a new marina within the marsh), it also states that this location should be in compliance with the proposed zoning of Studenchishte Marsh (the proposed zone where the current GUP location of the new marina is, is a “zone of sustainable use”, which allows interventions such as construction). The Draft Strategy envisages a feasibility study for the best locations of the new marina, as well as a new urban plan for the selected location. The problem is, if the Strategy is adopted as proposed, there won't be formal

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<sup>1</sup> North-East Shore (1), Former Municipality of Kosel (2), Ohrid-Old Town (3), Ohrid – New Town (4), East Shore (5), Peri-Galichica (6), and Galichica (7) – please see the Annex for visual presentation

and/or legal obstacles for a new marina in the marsh, on the contrary – all relevant documents will support such project (*Please see the Annex for explanation*).

We are not the only ones who concluded that the Draft Tourism Strategy proposes a new marina within Studenchishte Marsh – during the 13<sup>th</sup> Session of the WH Ohrid Region Management Commission (15.04.2022) one of the Commission members also shared the same concern.

Urbanization in this zone (“Ohrid - New Town”), as well as in other proposed development zones is another concern we have. The reply to all our comments related to the proposed urbanization in the development zones was that the term “urbanization” doesn’t refer to new constructions and, according to the authors, urbanization is an effective way to deal with the chaos of illegal constructions. Since the Draft Strategy doesn’t specify what the authors mean by “urbanization” it leaves the door open for future new constructions “in accordance with the Tourism Development Strategy”. The use of urbanization as a way to deal with illegal constructions in reality often means adopting new urban plans which will enable “legalization” of existing illegal constructions.

Both the Draft Strategy and Draft SEA Report fail to mention the current vulnerable state of the values of the site (and the fact that IUCN and ICOMOS experts, as well as the World Heritage Centre, confirmed twice in 2019 and 2021 that Ohrid Region fulfills the criteria to be inscribed on the List of World Heritage in Danger). Both documents also ignore the fact that UNESCO asked for a Strategic Recovery Plan because of the vulnerable state of the site. Our position is that such plan has to be taken into account when planning tourism development, which is one of the activities with high impact on the natural and cultural values of Ohrid Region. We also think that proper evaluation of the state of the values is crucial for a development of OUV based tourism strategy – which is one of the UNESCO’s recommendations.

Besides the accurate assessment of the current state, the Draft SEA Report lacks several other legally binding analysis, such as secondary and cumulative impact of the proposed activities, it doesn’t propose alternatives (has only zero scenario and the proposed strategy), etc. The reply to our comment about the missing legally binding parts was “such assessment can come only from SEA experts or the authorities who evaluate the SEA Report”.

MoE gave a positive opinion about the draft SEA Report of this strategy on 07.03.2022 – prior to public commenting and before the WH Ohrid Region Management Commission gave its opinion; then, in May 2022 MoE gave another positive opinion for the final SEA Report.

The WH Ohrid Region Management Commission sent to the Municipality of Ohrid a long list of remarks (not a positive opinion), some of which include: old/invalid data is used for the analysis; there is a lack of tourism development activities based on promotion of biodiversity and natural heritage; the focus should be more on private accommodation instead of new hotels; a Carrying Capacity evaluation should be included; the strategy shouldn’t envisage a new marina in the specific development zone – this part should be erased, the location of the new marina should be specified after a feasibility study is adopted and it should be in compliance with Lake Ohrid Revalorization Study, in a zone of sustainable use<sup>2</sup>; etc. The Management Commission also proposes modernization of the water level monitoring; activities for separation of atmospheric and fecal waste water; it points out that the strategy doesn’t refer to the problem of wastewater and waste generation in touristic locations; measures for cleaning of the shore are requested, including a suggestion for a specialized ship - cleaner of the shore; smart city public transport is another suggestion; activities for noise protection; support for small and medium

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<sup>2</sup> Please see the Annex for our visual analysis of this remark by the WH Management Commission



tourism development enterprises; etc. While we agree with most of the WH Management Commission remarks, we find one to be problematic – the proposal for golf terrains and racing tracks within the World Heritage Site.

**No logical order – new addition to ineffective management:** UNESCO’s recommendation and the Management Plan for the WH Ohrid Region envisage one OUV based Sustainable Tourism Development Strategy for the World Heritage Site, in a trans-boundary context. According to the Action Plan (of the WH Management Plan) this activity should have started in June 2021 and be finalized by December 2022 – as far as we know there are no activities related to this tourism strategy. Other related documents which, according to the Action Plan of the WH Management Plan, should have been adopted by now, include:

**Visitors Plan** - timeframe in the Management Plan: June 2020-June 2021; July 2022 - not yet started;

**Analysis of the uncontrolled tourism development impact and Evaluation of the carrying capacity** - timeframe in the Management Plan: February 2021- February 2022; July 2022 - not yet started.

**Urban plan for the shore** – this plan should define the use of the shore, beach areas, etc. – in 2021 the Government announced that funds from the budget have been approved and the plan will be adopted by the end of the year. In 2022, again, funds from the budget have been allocated for this plan. This was confirmed by the reply we received from the Ministry of Transport (the institution responsible for development of this plan) in June 2022, which also stated that the creation of this plan is on-going. At the same time we participated in a workshop organized by UN, during which it was announced that UNEP, UNESCO and UNDP are in a process of fundraise for a feasibility study, which will serve as a base for the urban plan for the shore – it’s expected that the study will be done by the end of summer of 2023.

To sum it up – Tourism Development Strategy for the Municipality of Ohrid (which is one part of the whole World Heritage site) is developed prior to the Sustainable Tourism Development Strategy for the whole World Heritage (from which it should derive), prior to the Visitors Plan for the WH, the Analysis of the impact of tourism development in the World Heritage and the Evaluation of the carrying capacity of the site; also prior to the Urban Plan for the shore; while there are no activities for the base law and crucial bylaw for allowed activities in the WH zones.

## **1.2. Draft Rural Development Strategy 2022-2027 for Municipality of Ohrid with Draft SEA Report**

The topic of the second strategy (and SEA Report) is rural development of the Municipality of Ohrid. Our main concern is that a significant focus is put on urbanization, there are new urban plans for almost all villages. We got almost identical reply to our comment on the proposed urbanization as for the Tourism Development Strategy – by “urbanization” the authors don’t imply new constructions, on the contrary, the urbanization envisaged here is an efficient way to control harmful constructions. The problem is this term is not specified or explained in the strategy itself. This document proposes a new marina in the coastal village of Peshtani. We asked what the basis of this proposal is and pointed out that the SEA Report doesn’t evaluate the impact of this project, it doesn’t even mention such marina - the reply we got to this comment is that this activity will be erased from the strategy. A new ski center is proposed on the Plakenska Mountain (similar/same project is proposed in the Tourism Development Strategy as well) – based on our consultations with biodiversity experts, who pointed out that the area is used for migratory paths of the Balkan lynx (*Lynx lynx balcanicus*), we asked for a feasibility

study on the presence of the lynx prior to any decision for a ski center in this area - the reply was that the request is accepted and will be incorporated in the strategy. One of our comments was that the rural development strategy doesn't even mention the illegal constructions in the villages - the reply was that the strategy deals with future rural development, the illegal constructions are not a subject (UNESCO also asked for all recommendations to be incorporated in all planning documents). Widening of the road Ohrid- St. Naum is mentioned, we asked for more details - the reply was that the road is part of the national road network and not in a jurisdiction of the Municipality. National strategy for roads development doesn't mention such project.

The WH Management Commission gave a negative opinion for this strategy. We have no information whether MoE issued an opinion for the related SEA Report.

**Note:** to our knowledge, both draft strategies and SEA Reports are still in a process of adoption and there aren't final versions; for both documents the creators informed us that they've been sent to UNESCO for consultations.

## **2. NON-IMPLEMENTATION OF THE MANAGEMENT PLAN FOR THE WORLD HERITAGE OHRID REGION:**

The adoption of this plan in early 2019 was promoted as “fulfillment of UNESCO’s recommendations”, but so far it has been mainly misused to justify further degradation (primarily for urbanization presented as “controlled urbanization in accordance with the Management Plan”), while almost all of the key activities from the Action Plan haven't been implemented. Even though, according to the Law on Managing WH Ohrid Region and the Management Plan itself, the Management Commission of WH Ohrid Region should coordinate the implementation of this plan, to our knowledge there is no coordination, nor monitoring of its implementation. The list of the activities which should have been completed by July 2022 is very long, we present some of the activities for which the Ministry of Environment is responsible (solely or with other institutions): new Law on Managing WH Ohrid Region – the Management Plan states that it should be adopted by October 2020, the process hasn't started yet; Bylaw for the allowed activities in each zone of the WH – timeframe in the Management Plan is Oct.2020 – Jul. 2021, no actions have been taken by July 2022; Revision of the Law on Nature Protection in order to strengthen the jurisdiction of the nature protection inspectors – should have been finished by Oct. 2021, the process hasn't started; Defining the buffer zone around the World Heritage Site – deadline in the Management Plan: Oct. 2021, there is no buffer zone in July 2022; Construction of an addition to the collector for waste water treatment for “Elen Kamen – village of Radozda” section of the shoreline – should have been finalized by Jun. 2022, nothing has been done so far; Construction of 2 small waste water treatment facilities for the coastal villages of Trpejca and Ljubanishta – the Management Plan states they'll be constructed by June 2022, no actions have been taken so far; Creation of visitors' plan – envisaged to be finalized by Jun.2021, the activity hasn't started by July 2022; Analysis of the impact and consequences of the uncontrolled tourism development and evaluation of the carrying capacity – the documents should have been finished by Feb. 2022, their creation hasn't started by Jul. 2022.

The only 2 activities for which MoE is (one of) the responsible institutions, for which there is some progress are the Law on proclamation of Studenchishte Marsh as a Monument of Nature (currently in draft version, public consultations have been organized) and the Revalorization Study for Lake Ohrid (draft version sent to the Government, public consultations are yet to be organized). These 2 documents closely relate to the Management Plans for Studenchishte Marsh (should have been adopted by October 2021) and Lake Ohrid Management Plan (envisaged adoption in the WH Management Plan: March 2021), as well as to the appointing of the management bodies for the marsh and the lake. Our position is that both documents (the draft law and the study) abound with issues, but at least there is some progress towards their realization.

## **3. UPDATE ON PREVIOUSLY REPORTED LAWS AND DOCUMENTS**

**Draft Amendments to the Law on Urban Planning** – we elaborated on this new and potentially harmful law in February 2022. According to the official report, the law was on the Governments' Agenda for the session on 16.07.2022, public hearing hasn't been organized yet. As we reported back in February, during the on-line debate organized by the State Commission for Prevention of Corruption, The Minister of Transport informed the participants that the public hearing requested by 34 organizations will be organized. In July 2022 we received a written reply from the Ministry of Transport stating that if they decide to organize public hearing for this law, they will inform us. Also, in February 2022 we reported that public oversight hearing for several laws related to urbanization (including this one) will be organized at the Macedonian Assembly – we recently found out that no request for such event has been submitted by any MP.

**Studenchishte Marsh Law** – public hearing was organized on 23.02.2022, during which the public was allowed only one question, any additional questions and/or comments were strictly silenced. MoE ignored our written comments for violation of public participation provisions during the public hearing; their position is that they agree with the zoning without buffer zone, as well as support the proposal for Municipality of Ohrid as a management body; the reply to our request to send the Draft Law to Ramsar Convention and UNESCO, was that they see no basis for such request and there is no need for consultation on the law with these 2 conventions.

**Transboundary agreement for fishery with Albania** – in early December 2020 it was announced that this agreement was signed by the 2 countries. In 2021 we asked for a copy, but got a reply that the Fishery Agreement hasn't been ratified yet and we'll get the copy once this process is finalized in both countries. Since we never received the copy, in June 2022 we sent another request for the document or information on its status. Legal deadline for the reply was 26.07 – but we haven't received anything.

#### **4. UPDATE ON ST. NAUM SPRINGS RAFT FLOATING RESTAURANT**

We've been fighting against this unlawful construction for several years now, our latest action, in June 2022, was sending 2 initiatives for inspection - 1 to the State Environmental Inspectorate (for specific breaches of the Law on Nature Protection) and 1 to the local construction inspector (for lack of mandatory permits). The environmental inspectorate practically replied that they are not responsible authority and re-directed us (even though we clearly pointed out the legal provisions which appoint them as a responsible body). This is our continuing experience with the State Environmental Inspectorate, all of our initiatives related to the WH Ohrid Region so far received meaningless replies/actions or a reply that they are not the responsible authority. The initiative to the construction inspectorate was more fruitful – the inspector visited the site and detected lack of mandatory permit for the construction; he issued a monition (notice) for removal of the platforms and if the owner doesn't remove them in the given timeframe, the inspectorate will issue a Decision for Removal. So far the restaurant platforms are intact and packed with visitors during the touristic season, but the deadline for removal hasn't been passed yet.

#### **5. THE URBANIZATION CONTINUES**

**Shore of Struga** – on July 21<sup>st</sup> Municipality of Struga published a Draft Sea Report for a new urban plan near the village of Radozda, which envisages new houses for tourism development. The plan itself hasn't been published and there wasn't any information about a public hearing, nor an address where to send the comments, or a deadline for the comments. Practically legally binding public participation is not possible for this plan. We sent a request for publication of all necessary information and documents, as well as for a public hearing, and asked for the 30 days commenting period to start after the Municipality of Struga fulfills their legal duty. We haven't yet received a reply. This is one of several new plans and projects for this part of the lake shore, which is well on the way to be almost entirely urbanized – please see the Annex for visual presentation of the urbanization taking place in this area and also for new development near the hotspot "Kalishta" (sublacustric springs)

**Further urbanization in Ohrid part** – at a request from the Municipality of Ohrid, on July 8<sup>th</sup> the WH Management Commission discussed a new Detailed Urban Plan for village of Velestovo, an area not too far from Studenchishte Marsh (*please see the Annex for the map*). The session was stopped during this discussion (because several members left and there wasn't a quorum for any decision-making) and we don't know whether the WH Management Commission formed an opinion about this plan.

On July 31<sup>st</sup> Municipality of Ohrid published a project programme for a new urban project which envisages construction of residential buildings (with rental flats, apartments and studios) in the village of Elshani, part of NP Galichica.

Despite all legal violations (to which we pointed out in our comments, appeals, complaints, etc.) MoE gave positive opinion for the SEA Report for Gorica North urban plan – urbanization on the border of Studenchishte Marsh is now one step closer.

Also in July 2022, Municipality of Ohrid published the urban project for a new industrial zone near the village of Leskoec (within the WH site, but not in the sensitive parts, such as NP Galichica or near the shore).

**Legalization of illegal constructions** – in the period 16.03.-13.07.2022 Municipality of Ohrid legalized 158 illegal constructions.

## 6. OTHER ISSUES

On 29.07.2022, in the area near the village of Radozda (Struga) the police discovered 17 fish nets with a total length of 3.400 m and a catchment of 66kg *Salmo ohridanus* and 12 pcs *Salmo letnica* (endangered endemic Ohrid trout).

A large area of 400ha reed belt between Struga and Kalishta (1 of 9 biodiversity hotspots) was burned down in late March. The state environmental inspectorate visited the site, but nobody was charged. Soon after the “incident” the burnt area was levelled down (prepared for construction). Burning of the reed belt for construction purposes takes place quite often, especially in the Struga part of the shore.

In March 2022, at the river Grashnica estuary, polluted fecal wastewater spilled into the lake. The State Environmental Inspectorate stated that the reason is probably mixing of the atmospheric and fecal water due to the heavy rainfall and snow melting.

## 7. SOME GOOD NEWS

According to the information from the media, starting from August 1<sup>st</sup> 2022, National Park Galichica will implement a new project “St. Naum Springs – inventorization of biological characteristics and ecosystem services (SN\_BESI)”, with a financial support from UNESCO and Abridn Charitable Foundation. The project envisages research and inventarization of the St. Naum Springs flora and fauna; evaluation of the species and habitats in accordance with the EU directives for habitats and invasive species; development of educational packages for various target groups about the biological, environmental and cultural characteristics of the area; evaluation of the state of the ecosystems and ecosystem services. Findings from the planned research and analysis will be integrated in the strategic documents of NP Galichica.

After many years of stagnation there are (administrative) steps towards construction of the South-west Regional Landfill near the village of Novaci (out of the WH site), which will enable closing down of Bukovo and all other illegal landfills within WH Ohrid Region.

During the previously mentioned UN workshop an information was shared that the Government asked for UN support for implementation of UNESCO's recommendations and discussions on this subject already started.

Respectfully,  
Iskra Stojkovska  
Executive Director, Front 21/42

[Annex](#)

- February 2022 -

18.02.2022, Skopje

## **Bern Convention on the Conservation of European Wildlife and Natural Habitats**

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

### **UPDATE REPORT (Dec.2021 – Feb.2022)**

#### **8. NEW HARMFUL LEGISLATION**

**8.1. Legalization of illegal constructions extended, expanded and eased** - The significant problem of illegal constructions within the WH Ohrid Region could soon get worse: first, in July 2021 the Assembly adopted the extension of the old Law for legalization of illegal constructions (without any restrictions for illegal constructions within any protected areas, as long as MoE gives a positive opinion); then in February 2022 the Government sent to the Assembly the final version of the new (parallel) Law on legalization of illegal constructions. In our view, the combination of these 2 laws has a potential for a very negative impact on Emerald sites Lake Ohrid and Galichica:

- The new law stipulates that all legalization procedures started under the old law will be completed accordingly- meaning over 20.000 illegal buildings within Ohrid Region can be legalized by March 2026. This includes houses, weekend houses, hotels, hotel complexes, etc. also in the 50m. shoreline zone and anywhere in NP Galichica. In the [Annex](#) we present a map with partially or fully illegally constructed (fully functioning) hotels on the lake shore and/or Galichica, for which the owners requested legalization under the old law. The full list of illegal hotels which can be legalized under the old law is much higher – the data we have is only from Municipality of Ohrid and until 06.2020, there is no data from Municipality of Struga (which hasn't replied to any of our requests for information, nor to the complaints for withholding public information), we have no information how many requests have been submitted to Ohrid since June 2020;
- The second law significantly expands the scope of illegal constructions eligible for legalization. As of now, only illegal constructions built before March 2011 can be legalized, with the new law this eligibility stretches to: those built between March 2011 – January 2021; built before March 2011 for which the owners missed the deadline for submission of requests for legalization; those whose legalization was rejected and valid Decisions for demolition have been issued, but haven't been demolished yet.

In 2017 UNESCO asked N. Macedonia to implement the immediate measure: *“Halt the process of legalization of all illegal constructions within the property until a detailed inventory of all existing constructions is established and relevant Heritage and Environmental Impact Assessments (HIA and EIA) have been carried out”*. In December 2017, instead of halting, the Government extended the Law on legalization of illegal constructions. As a result, in 2018 Municipality of Ohrid received over 2000 new requests for legalization of over 2200 illegal constructions. Our analysis of the illegal hotels' cases revealed that this extension in 2017 also stimulated expansion of the illegal hotels for which requests were submitted in 2011 – in 2018 some of the owners submitted new requests for legalization of additional amenities (swimming pools, beaches, terraces with outdoor restaurants, etc.). We have yet to see the results of this new extension and expansion;

- In the previous version of this second law, the condition for legalization of any illegal constructions within the WH Ohrid Region was a positive opinion from MoE and Ministry of Culture, confirming they don't have a negative impact on the OUV, based on the impact assessment studies. The final version doesn't mention the impact assessment studies (requested by UNESCO in 2017), instead it allows legalization with a positive opinion from MoE and an opinion from the World Heritage Management Commission that legalization of a particular illegal construction is in compliance with the Management Plan for WH Ohrid Region. The final version stipulates that in protected areas only

houses in buffer zones and zones of sustainable development can be legalized, and no residential buildings anywhere can be legalized, which is a symbolic positive step, but far from sufficient to solve the problem of illegal constructions in the WH, or even to prevent escalation of this problem. The law still allows legalization of new illegal hotels, hotel complexes, weekend houses, etc. if they are not located in the 50m shoreline and/or NP Galichica, regardless of their environmental impact.

This version of the new law doesn't even remotely implement UNESCO's recommendation related to the illegal constructions (in many ways it enables the exact opposite of what UNESCO thought is necessary, like expansion of the legalization which was supposed to stop in 2017) – there is no Inventory of illegal constructions within the WH, no mention of environmental impact assessment and no plan for demolition of the illegal constructions with a negative impact. Our opinion is that the inclusion of the WH Management Commission (which has no legal base to give an opinion which construction can be legalized, nor there is a defined methodology for creation of such opinion) and the WH Management Plan (which so far has been effectively misused for justification of harmful urban plans) – create a lot of space for legalization of many illegal constructions, regardless of their impact;

- The final version of this law also stipulates that any illegal construction outside of an existing urban plan can be legalized if the Municipality Council decides that it will fit into a future urban plan. These future urban plans (needed for legalization of illegal buildings) can be financed by the owners of the illegal constructions. In our opinion, this provision opens a wide door for future urbanization based on illegal constructions and (even more) corruption.

**Important note: the latest news about this law (18.02.2022) is that MPs from DOM (small green political party) blocked the adoption and requested an oversight hearing.**

#### **Additional information on illegal constructions**

- Municipality of Ohrid has approved legalization of: 100 illegal constructions in Nov. 2021; additional 31 illegal constructions were legalized in Dec. 2021; the 8<sup>th</sup> session in February 2022 envisaged legalization of 33 objects, but the session was stopped due to technical problems and these decisions haven't been adopted yet. Prior to the session there was a public opposition to the last set of decisions for legalization, by the Citizen's Initiative Ohrid SOS, stating that it is a violation of municipality's own Decision for regulation of the procedures for implementation of existing urban plans and projects and procedures for legalization of illegal constructions. The latest version of this Decision, adopted in Dec. 2021, states that all urban plans have to be in compliance with the WH Management Plan, except infrastructure projects and constructions of national interest (hydropower plants, railways, highways, etc.); it also stipulates temporary suspension of legalization of constructions within the 50m shoreline and within Studenchishte Marsh. Some of the 33 objects planned to be legalized in February 2022 were in the 50m shoreline;
- After repeated requests for information and complaints, we received from the Municipality of Ohrid around 300 case files of illegal constructions for which valid decisions for demolition have been issued (during our phone conversation the inspector informed us that there are over 7000 case files). We've just started to analyze the files and so far have some worrisome discoveries, the main one is that there are many illegal constructions for which demolition orders have been issued years ago, but they are still intact today. Examples include: illegal house 55m from the lake line and in NP Galichica for which demolition order has been issued in 2017; another house, also on the coast and in the national park which should have been demolished in 2013, etc. All these constructions and many more can be legalized under the new law.

**8.2. New Law on Urban Planning** - In January 2022 the Ministry of Transport and Communications published Draft Amendments to the Law on Urban Planning; the time for commenting was 15 days, with no public hearing. Proposed new provisions include:

- **Defining the “continuing creation, adoption, implementation and monitoring of the implementation of the urban plans” as a public interest activity** - the current Law on Urban Planning stipulates that urbanization (all mentioned stages of it) must be in service of the public interest, such as protection of the environment and cultural heritage. With the proposed change, urbanization becomes public interest per se. If it gets adopted, this provision has a potential for a devastating impact on nature, including the Emerald sites Lake Ohrid and Galichica. For example, the Law on Forests Protection prohibits any digging or transformation of the forests, with few exceptions – one of which is conducting public interest activities. The Law on Managing WH Ohrid Region defines the management of the world heritage, with a goal to preserve it for future generations, as a public interest. With the proposed change, the urbanization (one of the major reasons for the vulnerable state of the world heritage and even a threat to its survival) will become equal public interest. These are two of many potential long-term negative effects if urbanization is legally treated as a public interest activity per se;
- **Implementation of annulled general acts for villages** - the “General Village Act” was an old type of an urban plan before the currently valid Law on Urban Planning. This type of an urban plan is adopted without strategic environmental assessment – SEA, and consequently, without public information and participation in the SEA process. One of the most positive aspects of the current law was the introduction of the Urban Plan for Village with mandatory SEA, instead of the General Act. Several villages in Ohrid Region have General Acts, which became invalid with the adoption of the current law – if this new provision gets adopted the coastal villages of Lagadin, Trpejca, Ljubanishta, etc. will be urbanized without environmental impact assessment and public participation. *Please see the [Annex](#) for maps of these villages with (currently invalid) General Acts*
- **Automatic treatment of any kind of land (agricultural, forest, coastal, etc.) as a construction land, if it is a part of urban project outside of an existing urban plan** – currently urbanization of any other type of land, except construction land, requires a procedure of transformation, which is regulated by various laws for the specific types of land (e.g. Law on Forest Protection defines the conditions and procedures for a forest land to be transformed into a construction land). With the new provisions, all these legal provisions will be skipped and any land will be considered a construction one, as long as it is needed for an urban project outside of existing urban plan;
- New amendments proposed by the Ministry of Transport, include adoption of urban planning programmes and urban projects with *confirmation of certification*, instead of current Decision for adoption. The difference is that the public can submit a complaint against a formal act such as Decision, but has no access to justice for confirmation of certification. In other words, the **Ministry of Transport tries to disable the citizens to legally challenge urban planning programmes (the first step in the urbanization) and urban projects.**

We strongly opposed this amendments and 34 organizations (including the Civil Engineering Institute Macedonia, the Faculty of Forestry, etc.) supported our request for a public hearing before such provisions are sent to the Assembly, as well as confirmed our concerns for their devastating consequences. Following this, the State Commission for Prevention of Corruption organized a public debate on February 16<sup>th</sup> 2022, with a participation of the Minister of Transport and Minister of Environment. Based on the short speeches from both ministers we are not optimistic, but the good news is that the public hearing for this new law will be organized.

- 8.3. New Draft Law on Studenchtishte Marsh** - On 02.02.2022 a new version of the Draft Law for Proclamation of Studenchtishte Marsh as a Park of Nature was published, the public hearing is scheduled for 23.02.2022. This version is almost the same as the previous one (there is no buffer zone, the proposed management body is Municipality of Ohrid, etc.). The only new provision is that the owners of the properties within the Marsh will participate in the



determination of the allowed activities in the zone of sustainable use. There are 27 properties owned by private citizens within Studenchtishte Marsh and during the public hearing for the Urban Plan Gorica North it was clear that the owners of the properties within and around the Marsh greatly support urbanization of the area, just like the Municipality of Ohrid (future management body of the marsh) does. We are afraid that if the decision-making is left solely to the Municipality of Ohrid and the owners of the properties, urbanization is imminent not only in the surrounding of the Marsh, but within the site as well. - *Please see the [Annex](#) for maps of proposed zoning and types of properties within Studenchtishte Marsh.*

## **9. FURTHER URBANIZATION – RECENT DEVELOPMENT**

**9.1. Urban Plan Gorica North (update)** – One of many legal breaches in this document and the process of its creation is that the SEA expert was hired and paid by the investor, instead of the Municipality, as the law states. Because of this, we submitted an application for a conflict of interest to the State Commission for Prevention of Corruption. In January 2022 the Commission informed us that they opened a case file based on our application and investigation is on-going;

### **9.2. Other urban plans in “Gorica” area**

Gorica East area 1 (new hotels, motels, weekend houses, etc.) – like Gorica North, this plan is not in compliance with the WH Management Plan because it envisages urbanization outside of the existing towns and settlements, but the SEA expert assessed that it is in compliance with the Management Plan and is a beneficial urban plan. This expert was also engaged by the investor, just like in the case of Gorica North. We’ve submitted several letters and a complaint against MoE (for issuing a Decision for spatial planning, necessary for the development of the urban plan); we’ve also participated in the public hearing and sent written comments (end of November 2021), but received no reply to the comments. After submitting a request for a reply to our comments, in February 2022 the Municipality of Ohrid informed us that they didn’t receive any comments from us – we have a certified confirmation slip from the post office that our comments were posted on 29.11.2021 (and it’s the same address of Municipality of Ohrid we’ve used countless times). We suspect that Municipality of Ohrid doesn’t want (or know how) to reply to our comments, most of them pointing out flagrant legal breaches, so they decided to say they never received them. This has happened before with another institution (and we later proved that the institution received our letter);

Gorica East area 2 – in November 2021 we submitted a request for information about this and other urban plans noted in an adopted Urban Planning Programme of Municipality of Ohrid, but haven’t received the information prior to our presentation of the case at the 41<sup>st</sup> Meeting of the Standing Committee. The information was received in December 2021 and in January 2022 the Decision for spatial planning issued by MoE for this plan was published on their website. Gorica East (area2) envisages urbanization of 15.7ha with housing units; business, commercial, recreational and memorial facilities, infrastructure, etc. (currently un-urbanized area). In Jan. 2021 we submitted a Complaint against MoE for issuing a Decision for spatial planning for this plan, thus enabling further urbanization and degradation of Ohrid Region, contrary to the WH Management Plan and the Law on Managing WH Ohrid Region; - *The map with urbanization of the area surrounding Studenchtishte Marsh is now updated with this plan – please see the [Annex](#) to this report*

Tourism complex Gorica (planning area 2) – another plan for which we received information after the presentation of the case. It includes weekend houses, motels, hotels, restaurants, infrastructure, etc. Municipality of Ohrid informed us that there haven't been any activities towards the development of this plan since it was documented in the Urban Planning Programme approved in 2018. - *The map with urbanization of the area surrounding Studenschte Marsh is now updated with this plan – please see the [Annex](#) to this report*

### **9.3. Urbanization – other plans/projects**

Weekend houses, Village of Radozda, Struga – another urban plan for which we've submitted several letters, complaints, interventions, etc. to various authorities. In January 2022 we got a reply from the Municipality of Struga, stating that the Ministry of Environment has issued a Decision for spatial planning for this plan and the municipality acts in accordance with the law.

We have very little information about any urban (or other) development in the Municipality of Struga because most of it is not publically available. Even the Official Journal (where all municipal decisions are published), which by law has to be published regularly on the website, hasn't been published for entire year of 2021. This was corrected after we sent a request for all Official Journals in 2021, but the practice continued soon after – for the past 2 months no journals have been published;

New hotel near Biljanini Springs – we informed about this hotel in our previous reports. In January 2022 we found out that the project has been approved by the Municipality of Ohrid, without previously obtaining mandatory positive opinion from the WH Management Commission. This was reported by the Municipality of Ohrid representative during the 10<sup>th</sup> session of the WH Management Commission;

Urban plan, Village of Ramne (NP Galichica) – in December 2021 the Municipality of Ohrid published a planning programme for a new urban plan for the Village of Ramne (10.87ha), it envisages houses, weekend houses, hotels, commercial facilities, etc. Planning programme is the very first step in the urbanization process.

We received a message from a concerned citizen, through social media, for a new hotel being constructed in Ramne, with pictures. - *Please see the [Annex](#) for a satellite map of Ramne and pictures of the new construction*

## **10. STRATEGIC AND OTHER PLANS/PROJECTS**

- 10.1. Corridor VIII (highway and railway)** – several steps towards realization of this project were taken: in Dec. 2021 the Government constituted a Committee for negotiations for the implementation of this major infrastructure project; also in Dec. 2021 the Constitutional Court rejected the State Commission for Prevention of Corruption's application for an assessment of the constitutionality of the special law for "Bechtel and Enka", the company which will build the highway in Corridor VIII; in February 2022 the Government discussed transformation of agricultural land into a construction land (needed for Corridor VIII) including transformation of the section Trebenishta – Podmolje – Ohrid, which goes through the World Heritage Ohrid Region. There are no minutes published from this session yet, so we don't know the outcome of this discussion;

**10.2. Management Plan for St. Naum complex** – in December, during one of the sessions of the WH Management Commission, we learned that the Government asked Public Enterprise NP Galichica to deliver a special Management Plan for the St. Naum complex by May 1<sup>st</sup> 2022. We've reported before about "Ostrovo", the floating platforms restaurant at St. Naum springs (zone of strict protection in NPG), allowed by MoE's positive opinion for the environmental elaborate. We've raised the issue of legal violations and negative impact of this facility with the Government, NP Galichica and the WH Management Commission and as a result the Government didn't approve renewal of the contract between NPG and Ostrovo and the discussion at WH Management Commission ended with almost all members being in favor of closing down the restaurant and restoring the site to its natural state. We are afraid that asking for a Management Plan for the area (instead of closing down the place) could be a way to "legalize" this activity, but we have to wait for the draft of this plan to see if that is indeed the intention;

**10.3. Municipality of Ohrid Strategy for tourism development (2020-2025) and Strategy for rural development (2022-2027)** – Draft versions of both strategies, together with draft SEA reports had been published on 15.02.2022, public hearings are scheduled for 09.03.2022.

**11. OTHER ISSUES** - An area of 10.000 m<sup>2</sup> reed belt, between Struga and Kalishta (1 of 9 biodiversity hotspots) was burned down; Since the beginning of the year the police had 9 actions against poachers caught with illegal catchment of endemic Ohrid trout; Citizen's initiative Ohrid SOS reported an alarming lake pollution from wastewater being discharged directly into the lake at Mazija (1 of 9 biodiversity hotspots in Lake Ohrid); Owner of a construction company which was reported for dumping construction waste into Lake Ohrid (but the prosecution dropped the charge against the company and charged only the responsible persons), also owner of an illegal restaurant in Ohrid and illegal asphalt base (which was demolished in 2020), was appointed as a member of the Municipality of Ohrid Commission for Environmental Protection.

**12. SOME GOOD NEWS** – WH Management Commission finally opened its sessions for all interested stakeholders (legal obligation from the Law on Managing WH Ohrid Region). We took part in all 4 (so far) opened sessions and are happy to report that the Commission put on the agendas and discussed all the issues we've raised with them; On 17.02.2022 Municipality of Debarca published the Draft SEA for the project for re-diverting river Sateska into its natural streambed (r. Sateska is tributary to Lake Ohrid and one of the main sources of lake pollution). The project has been dragging for years and this step towards (hopefully) soon implementation in real life is a very positive one.

Respectfully,

Iskra Stojkovska

Executive Director, Front 21/42