



Strasbourg, 24<sup>th</sup> October 2023

**T-PVS/Files(2023)31**

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

43<sup>rd</sup> meeting  
Strasbourg, 27 November – 1 December 2023

---

**Open File: 2017/2**

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

**- REPORT OF THE ON-SPOT-APPRAISAL -**

25-27 April 2023

*Document prepared by  
Mr Andrej Sovinc, independent expert*

---

## Table of Contents

<b>1. INTRODUCTION AND BACKGROUND .....</b>	<b>- 4 -</b>
<b>2. OBJECTIVES OF THE MISSION .....</b>	<b>- 6 -</b>
<b>3. INFORMATION GATHERED BY THE EXPERT .....</b>	<b>- 7 -</b>
<b>3.1. Laws, Decisions and Plans governing the Ohrid Region .....</b>	<b>- 7 -</b>
<b>3.1.1. The draft Law on urban planning and the laws for legalisation of illegal constructions .....</b>	<b>- 7 -</b>
<b>A) Approved permits for construction in the Municipalities of Ohrid and Struga .....</b>	<b>- 7 -</b>
<b>B) Illegal constructions across the protected areas .....</b>	<b>- 8 -</b>
<b>3.1.2. Moratorium on coastal and urban transformation .....</b>	<b>- 9 -</b>
<b>3.1.3. Implementation of the Management Plan for the Ohrid Region .....</b>	<b>- 10 -</b>
<b>3.1.4. Strategic Recovery Plan for Revitalisation of Ohrid Region natural/cultural values .....</b>	<b>- 11 -</b>
<b>3.2. Key planning documents specific to the Lake Ohrid or Galichica Emerald Network sites .....</b>	<b>- 11 -</b>
<b>3.2.1. Valorisation Study for Lake Ohrid and Draft Management Plan for Lake Ohrid .....</b>	<b>- 11 -</b>
<b>3.2.2. Draft Strategy for Tourism Development for the Municipality of Ohrid .....</b>	<b>- 13 -</b>
<b>3.2.3. New management plan for Galichica National Park .....</b>	<b>- 14 -</b>
<b>3.3. Specific sites and projects .....</b>	<b>- 15 -</b>
<b>3.3.1. Studenchishte Marsh and the draft Law to proclaim it as a Protected Area .....</b>	<b>- 15 -</b>
<b>3.3.2. Gorica North project .....</b>	<b>- 19 -</b>
<b>3.3.3. Strictly protected area of St. Naum springs .....</b>	<b>- 19 -</b>
<b>3.3.4. Information about the small hydropower plants (sHPPs) on River Koselska .....</b>	<b>- 21 -</b>
<b>3.3.5. European corridor VIII railway project and A2 highway project .....</b>	<b>- 23 -</b>
<b>3.4. Progress in response to recommendation no. 211 (2021) of the Standing Committee, adopted on 3<sup>rd</sup> December 2021, on conservation measures within national parks in North Macedonia, including in relation to Mavrovo National Park and Lake Ohrid and Galichica national park .....</b>	<b>- 24 -</b>
<b>4. GENERAL CONCLUSIONS .....</b>	<b>- 26 -</b>
<b>5. MISSION'S RECOMMENDATIONS .....</b>	<b>- 27 -</b>
<b>ANNEXES .....</b>	<b>- 29 -</b>
<b>- Programme - .....</b>	<b>- 29 -</b>
<b>- Bibliography - .....</b>	<b>- 32 -</b>

**List of Abbreviations**

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

CBD Convention on Biological Diversity

CSO Civil Society Organisation

EIA Environmental Impact Assessment

EEP Elaborate for Environmental Protection

EU European Union

GUP General Urban Plan

HIA Heritage Impact Assessment

(s)HPPs (small) Hydropower projects

ICOMOS International Council on Monuments and Sites

IUCN International Union for Conservation of Nature

MoEPP Ministry of Environment and Physical Planning (of North Macedonia)

MPNCHOR 2020-2029 Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029

NGO Non-governmental organisation

NP National Park

OUV Outstanding Universal Value

PA Protected Area

PONT Prespa Ohrid Nature Trust

RMM Reactive Monitoring Mission

SDG Sustainable Development Goals

SM Studenchishte Marsh

ToR Terms of Reference

WH World Heritage

WHC UNESCO World Heritage Centre

## 1. INTRODUCTION AND BACKGROUND

The complaint 2017/2 concerns an alleged breach of the Bern Convention related to urbanisation developments within the territories of Lake Ohrid and Galichica National Park (and their surroundings) in North Macedonia.

In 1979-1980, the Ohrid Region was declared as a World Natural and Cultural Heritage site, protected by UNESCO “*Natural and Cultural Heritage of the Ohrid region*”. In 2014, Lake Ohrid and Galichica National Park became part of the UNESCO World Network of Biosphere Reserves “*Ohrid-Prespa*”. Both are officially nominated as Emerald Network Sites (MK0000024 and MK0000001). In 2021, Lake Ohrid and Studenchishte Marsh were added to the [World Ramsar List](#). And finally, Lake Ohrid is protected as a Monument of Nature since 1977 (IUCN cat. III), the status of which is undergoing a re-proclamation following an ongoing valorisation study (see Map 1).

A joint Reactive Monitoring Mission (RMM) of the UNESCO World Heritage Centre (WHC), International Council on Monuments and Sites (ICOMOS) and International Union for Conservation of Nature (IUCN) was carried out in 2017 and reflected that the “increased urbanisation along the coast and in the upper parts of the national park caused fragmentation and destruction of habitat, increased interference with natural resources (particularly water), and pollution (e.g. solid waste, construction debris, wastewaters, air pollution, noise)”. A further RMM took place in January 2020 ([report](#)), and these concerns were reiterated.

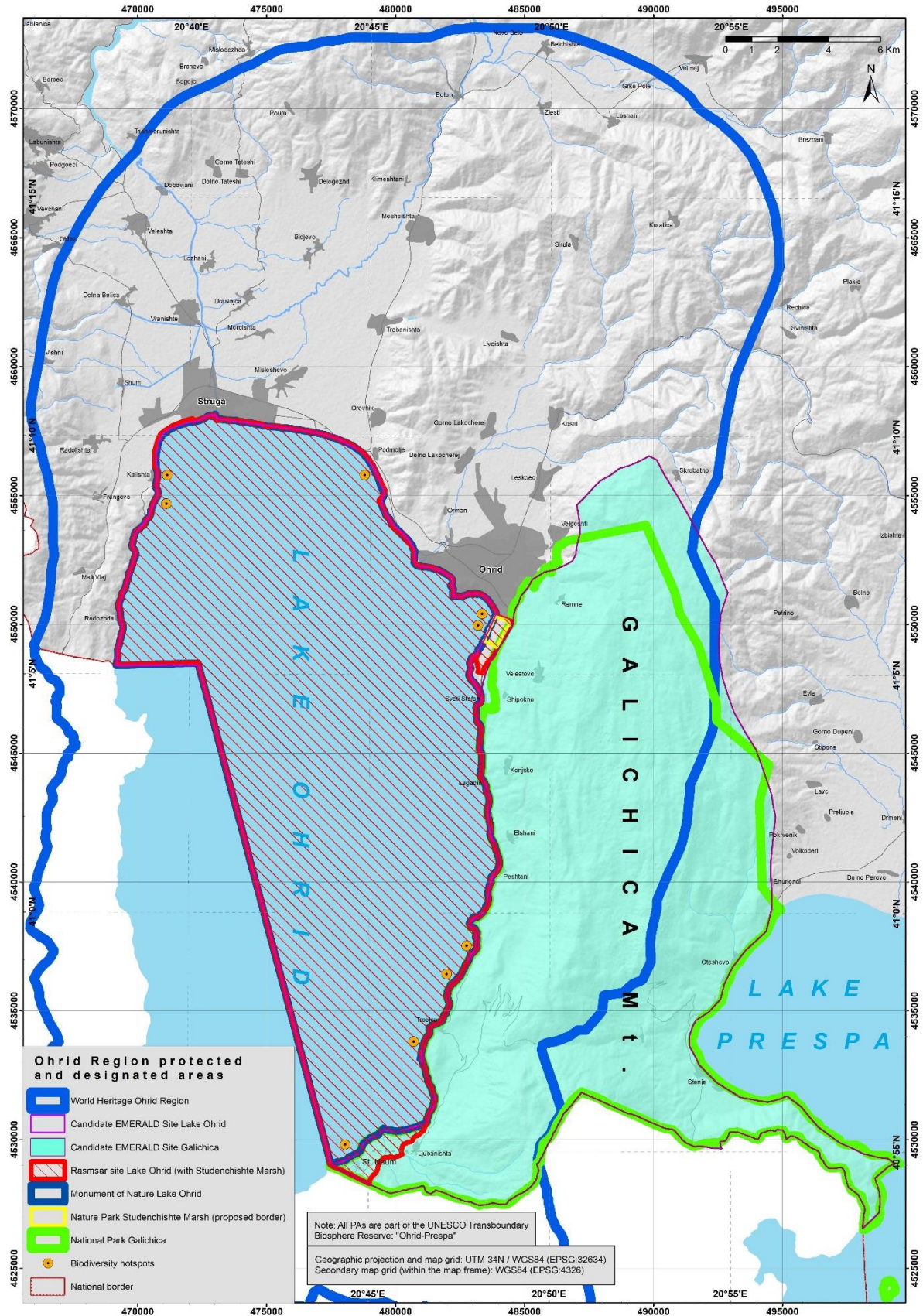
The authorities’ first response to a Bern Convention request for information in March 2018 stated that they were in the process of implementing the recommendations issued by the joint mission of 2017 including the preparation of an SEA of the *Draft Management Plan for the Natural and Cultural Heritage of the Ohrid region* (which is still at an early stage of development).

In September 2018, the Bureau of the Bern Convention noted with concern the ongoing activities affecting the coastal regions of the Lake and the alleged lack of implementation of the WHC/ICOMOS/IUCN recommendations.

In December 2020, the Standing Committee, in relation to another complaint concerning North Macedonia (Open File 2013/01 on hydropower development within Mavrovo National Park) decided to mandate an on-the-spot appraisal (OSA) which it stressed should also include a preliminary assessment of the Lake Ohrid and Galichica NP candidate Emerald Network sites. The mission took place online due to the Covid pandemic in May 2021 and the independent experts advised that the latter sites required a further dedicated OSA.

At its 41<sup>st</sup> meeting in December 2021, the Standing Committee decided to elevate this complaint to an Open File and to mandate an OSA to Lake Ohrid and Galichica National Park. The authorities of North Macedonia agreed, and the Committee further advised that other involved organisations such as IUCN, Ramsar, and UNESCO WHC could be invited to take part as observers, in order to build on but not duplicate the recommendations of the previous RMMs. The newly adopted [Recommendation No. 211 \(2021\)](#) on conservation measures within national parks in North Macedonia, including in relation to Mavrovo National Park and Lake Ohrid and Galichica National Park should also be a reference point.

More information on this case, including all the reports sent by the government of North Macedonia and the complainant since 2017 is available on the [case-file dashboard](#).



Map 1: Showing the various designations of the Ohrid Region. Compiled by Front 21/42.

## 2. OBJECTIVES OF THE MISSION

On the basis of the instructions by the Standing Committee, the information provided by the authorities, complainant NGO and other stakeholders, and using [Recommendation No. 211 \(2021\)](#) and the [recommendations](#) of the RMM of WHC/ICOMOS/IUCN as references, the objectives of the mission were, through research, on-site assessment, and discussions with relevant stakeholders, to:

*Concerning Lake Ohrid and its surroundings:*

1. Collect information on existing and newly planned urbanisation and energy projects, especially in the surrounding area of the 9 biodiversity hotspots of Lake Ohrid, and in particular the Gorica North project which envisages many commercial developments over 17 hectares, and the small hydropower plants on River Koselska. Consider also the impact the decision for a moratorium<sup>1</sup> on urbanisation may have on Lake Ohrid and its surroundings.
2. Collect information on the Draft Law on proclamation of Studenchishte Marsh as a Park of Nature and consider its feasibility in particular relative to the lack of a proposed buffer zone, taking into account that the Marsh and Lake Ohrid have recently been declared as a Ramsar Site.
3. Collect information on the Valorisation Study for Lake Ohrid and Draft Management Plan for Lake Ohrid.

*Concerning Galichica National Park and its surroundings:*

4. Collect information on existing and newly planned urbanisation and energy projects such as the Raft Floating Restaurant in the strictly protected area of St. Naum springs.
5. Collect information on the new management plan for Galichica National Park.
6. Collect information on the *Draft Management Plan for St. Naum* complex.

*Concerning other important projects and plans which may have negative impacts on the Emerald Network sites:*

7. Collect information on the state of affairs of the European Corridor VIII railway project and A2 Highway project.
8. Collect information on the status of illegal constructions across the protected areas, on the laws for legalisation of illegal constructions and on the draft law on urban planning.
9. Collect information on the implementation of the *Management Plan for the Ohrid Region*, the *Draft Strategy for Tourism Development for the Municipality of Ohrid*, and on the development of the *Strategic Recovery Plan for revitalisation of Ohrid Region natural (and cultural) values*.

The report begins with an overview of the Laws, Decisions and Plans governing the Ohrid Region, followed by a section on key planning documents specific to the Lake Ohrid or Galichica Emerald Network sites, before narrowing down to an assessment of specific sites and projects which were of concern to the Mission. A short analysis of the implementation of [Recommendation No. 211 \(2021\)](#) is [also included](#). Several targeted expert recommendations are provided within each sub-chapter, while the general conclusions and recommendations are featured at the end of the report.

---

<sup>1</sup> Decision on the methods of implementation of existing urban plans and urban planning documentation, and adoption of new urban plans and projects, as well as methods of managing the procedures for establishing a legal status of illegally constructed objects in the Municipality of Ohrid.

### 3. INFORMATION GATHERED BY THE EXPERT

#### 3.1. Laws, Decisions and Plans governing the Ohrid Region

##### 3.1.1. The draft Law on urban planning and the laws for legalisation of illegal constructions

In the context of achieving the goals of nature conservation and understanding the management of protected areas, it is essential that the prevention of construction in protected areas is a matter for the *Law on Urban Planning* and other land use planning laws, and is not achieved through the legal basis for establishing the protected area (PA) or even the management plan for the PA.

This is not the case with the legal basis in North Macedonia. For example, the construction of HPPs are defined in the *Law on Construction* as objects of state importance. Such facilities can be built in PAs according to the *Law on Urban Planning*. The same applies to tourism development zones which are defined in the *Law on Construction*.

Both the *Law on Construction* and the *Law on Urban Planning* facilitate the construction of temporary objects and urban facilities through unclear definitions of these objects while allowing too many exceptions to the building permits, clearly subordinating the goals of nature protection to the goals of urbanisation. According to the *Law on Urban Planning*, outdated city plans are considered valid until new plans are adopted, which is the case for the long-outdated *Municipal General Urban Plans for Ohrid (2002-2012)* and *Struga (2007-2017)*. As the plans have not been updated to reflect the known threat of urbanisation to the Ohrid region, they can easily convey harmful practices.

Meanwhile, the current *Law on the Handling of Illegal Construction (2011)* was intended to legalise illegal properties built before 2011. Due to the high number of legalisation requests, the law was recast in 2021 for the period until 2026. It does not include clauses requiring EIA and HIA as recommended by UNESCO/ICOMOS/IUCN in 2017. In relation to the protection of the ecologically sensitive ecotone between the lake and the land, it is important to note that the law requires an opinion from the Galichica NP administration and MoEPP for constructions in the PA and within 50 meters of Lake Ohrid, although the ecologically valuable areas extend also beyond this narrow belt.

However, a new draft law regulating the status of illegal constructions has been drafted (but not yet adopted), which provides that objects built before 1<sup>st</sup> January 2021 will be eligible for legalisation, and that applications rejected under the 2011 law can be (re)legalised under the new law. This new draft law contains many exceptions and provides several ways to legalise objects like single-family homes in the Zone of Sustainable Use in PAs and even within 50 meters of natural and artificial water bodies, etc. These exceptions allow constructions to start legalisation procedures at a very early stage of completion, making them hard to remove, thus calling into question the value of the Zone of Sustainable Use as an area that meets the IUCN definition of a PA, and in any case it cannot be included in the 75% of the area of a PA where the primary management objective of nature conservation is supposed to apply.

##### A) Approved permits for construction in the Municipalities of Ohrid and Struga

The table below shows the official data on the approved permits for the construction of residential buildings in recent years and in relation to the average of the last ten years in the Municipalities of Ohrid and Struga (State Statistical Office, 2022).

	Ohrid Municipality	Struga Municipality
Permits for construction of residential buildings approved in 2022	390	144
Total number of permits on temporary and permanent accommodation (2010 – 2022)	4,209	2,625

The *Ohrid Region Natural and Cultural Heritage Management Plan 2020-2029* sets the objective of reducing the urbanisation rate, which unfortunately has not happened in the Ohrid municipality: there has even been an increase in the area approved for the construction of residential buildings (compared

to the ten-year average of 19,800 m<sup>2</sup>/year, this figure has increased to an average of 24,261 m<sup>2</sup> of approved residential area per year after 2020).

Struga Municipality has performed better, but only marginally: the 20,607 m<sup>2</sup> of approved floorspace after 2020 shows on average only a marginal decrease of 342 m<sup>2</sup> compared to the average values in the decade before 2020 (State Statistical Office, 2022).

According to the data compiled by the complainant and Ohrid SOS (2023) from December 2021 to March 2023, Ohrid Municipality Assembly approved 353 legalisation requests (some involving more than one structure), including along the coast, on Mount Galichica and also at Gorica North, right next to the ecologically valuable, sensitive and future PA of the Studenchishte Marsh.

#### *B) Illegal constructions across the protected areas*

According to the State Audit Office, in 2021, 26,662 applications for regularisation of illegal structures were submitted under the 2021 *Law on the Handling of Illegal Constructions* (2011) in the municipalities of Ohrid and Struga, i.e. in the World Heritage area. It is still unclear how many illegal structures are actually within the WH area, as the 2017 recommendation of the UNESCO/ICOMOS/IUCN Joint Mission that an inventory of all illegal structures in the WH property should be made and that relevant HIAs and EIAs to assess their impacts on the OUV of the WH property should be made has still not been accurately compiled or completed. According to the same source (State Audit Office, 2021), 33% of the claims have already been regularised in 2021, 25% were refused and the rest are still pending. The table below shows the number of legal requests and their status based on the Law in the Municipalities of Ohrid and Struga.

	Number of legal requests / (buildings)	RESOLVED (=granted legal status)	REFUSED	STILL OPEN	UNDETERMINED STATUS
Municipality of Ohrid	15,939 / (19,935 buildings)	5,806	2,544	11,585	-
Municipality of Struga	10,723 / (? buildings)	3,049	4,040	2,775	859

According to a report from the State Statistical Office (2021), the trend of building illegal structures has not stopped; in this year alone, more than 70 new illegal structures were built in Ohrid Municipality and more than 30 in Struga Municipality. This is the official data; but it is very likely that there are even more new illegal buildings.

From the point of view of ensuring a favourable conservation status for species and habitats, construction in the transition zone between the lake and the mainland is particularly problematic; at Lake Ohrid, the proportion of natural shoreline has been drastically reduced at the expense of the increase of built structures on the shore. The natural shoreline of Lake Ohrid is now only preserved in fragmented small sections, with drastic negative consequences for the provision of conditions for flora and fauna. The construction of buildings within a 50-metre zone from the surface of the lake is prohibited by the *Law on Waters*, but this legal provision is rarely observed and often violated.

The issue of regulating or restricting construction within 50 metres of the coastline highlights one of the key weaknesses of the national nature protection system, especially relevant for the Lake Ohrid:

- a) no synchronisation between the different legal bases and even conflicting provisions defining the frameworks for construction or legalisation of buildings; if construction is prohibited or restricted under one regulation, it is allowed under another regulation.
- b) a large number of exceptions in the legal bases that allow construction in the 50-metre zone or allow their legalisation; even in the regulations for PAs there are significant exceptions. It should be noted that zones of sustainable use, which are vulnerable to both legal and illegal construction, are applied broadly in the Galichica NP and in the proposed Studenchishte Marsh PA. In addition, legalisation of illegally built buildings is allowed in buffer zones of PAs.



### Expert recommendations

- The new draft law regulating the status of illegal constructions should be reworded and possible exceptions to the law should be redefined to:
  - a) give priority to the protection of natural and cultural heritage;
  - b) restrict legalisation of illegal objects in PAs and their buffer zones to exceptional cases under specially developed criteria, where nature conservation objectives should take precedence over all other objectives or uses;
  - c) ensure more precise descriptions of temporary objects, urban equipment and other objects to prevent the open interpretation of their meaning, leading to easier legalisation procedures.
  - d) set up swift deadlines for legalisation decisions to be issued from the moment that an application for legalisation is submitted;
  - e) ensure that demolition decisions and procedures are not delayed;
  - f) thoroughly define the role, scope, content and precedence of EIAs and HIAs; and
  - g) establish explicit provisions to prevent legalisation of illegal objects for which a negative opinion has been issued by MoEPP, Galichica NP or any other relevant body, or that have been assessed as significantly detrimental to OUV by an EIA or HIA.
- No new clauses or provisions should be inserted into existing laws in line with the above elements.

#### *3.1.2. Moratorium on coastal and urban transformation*

### Findings

Establishment of a construction moratorium was requested by the 2020 UNESCO/ICOMOS/IUCN RMM Recommendation 1.g<sup>2</sup>, which followed a similar request from the 2017 RMM (Recommendation 6 for a moratorium on coastal and urban transformation). The Moratorium is described by the Recommendation as a “*decision on the methods of implementation of existing urban plans and urban planning documentation, and adoption of new urban plans and projects, as well as methods of managing the procedures for establishing a legal status of illegally constructed objects in the Municipality of Ohrid*”.

The Ohrid Municipal Assembly adopted a “*Decision on the Method of Implementing Existing Urban Plans and Urban Planning Documents and Adopting New Urban Plans and Urban Projects, as well as on the Manner of Conducting the Procedures for Determining the Legal Status of Illegally Built Structures*” (Municipal Gazette 14/2022, Decision no.08-17370/61 from 22 Dec 2022). It is in fact a repeat of the same Decision that was adopted at the end of 2021 (Municipal Gazette 17/2021 Decision no. 08-13561/39 from 29 Dec 2021).

### Expert's conclusions

The “*Decision on the Method of Implementing Existing Urban Plans...*” (adopted by the authorities in Ohrid, but not in Struga) is supposed to have the force of a moratorium as called for by the RMM, but in practice it does not have this effect because it allows construction to continue, provided that development is aligned with the *Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029*. Also, there are too many exceptions which allow for construction within the framework of the above Decision. Both Ohrid and Struga Municipalities have issued other related decisions (albeit in a slightly different format) since 2019, but all lack scope and an implementation mechanism. As could be seen from the State Statistical Office data in section 3.1.1 above, construction activity has not decreased in recent years, and effective prevention of construction activity has never taken place.

---

<sup>2</sup> <https://whc.unesco.org/document/187543>

Urbanisation in the Lake Ohrid area is rampant and uncontrolled. There are neither sufficiently effective legal frameworks (e.g. the *Law on Management of the Natural and Cultural Heritage of the Ohrid Region*), nor are they mutually compatible (e.g. the *Law on Nature Protection* is not harmonised with the *Law on Water*; e.g. permits for construction in the 50 m coastal zone of Lake Ohrid are issued under the *Law on Water* for objects that do not have a clear or primary water management role). Definitions in the legal bases lack precise descriptions (e.g. lack of clarity regarding structure, shape, materials used, or lack of clarity regarding the time interval of validity of terms such as "urban equipment" and "temporary objects").

On the other hand, a number of legal, management and planning documents are being drawn up, the implementation of which is null and void, and which appear to be being drawn up only to buy time to justify inaction. In urban areas such as the cities of Ohrid and Struga, there are no valid planning frameworks to guide the orientation of further constructions in line with the objectives of environmental protection, cultural heritage and sustainable development. The cities of Ohrid and Struga have not had a *General Urban Plan* for a long time. Inspection services are dysfunctional, understaffed and underperforming.

It appears that the awareness of the decision-makers and other key stakeholders on the importance of a responsible attitude towards the environment and landscape, nature conservation, as well as cultural heritage in a region as ecologically and historically important as Ohrid is very low. There is a lack of understanding that the Ohrid area is one of Europe's most important nature and cultural heritage sites and that its development should therefore not be based on the same standards as those applied to areas that do not have the OUV designation. This is not surprising, as there are no signs of the area being protected as a natural feature in and around the lake (with the exception of Galichica NP). The low level of awareness of the importance of nature protection is illustrated by the fact that the iconic Ohrid trout *Salmo letnica* is fished widely and, despite the ban, is available as a meal in taverns and hotels along the lake.

From the point of view of preserving the ecological character of the proposed Emerald sites, it is important to note that the general public's recognition of threats to natural habitats and indigenous species is much lower than their higher sensitivity towards encroachment on the historical and cultural heritage of the site.

In addition to direct threats to natural areas such as habitat destruction and fragmentation, uncontrolled urbanisation also contributes indirectly to the deterioration of the ecological status of the lake through overloaded wastewater disposal systems, increased nutrient inputs into the lake and pollution from waste.

### *3.1.3. Implementation of the Management Plan for the Ohrid Region*

The key legal and managerial documents that should guide preservation and management of the Lake Ohrid WH Property are the *Law on Managing World Heritage in the Ohrid Region (WHOR)* and the *Management Plan for The World Heritage Ohrid Region*. The responsible body for the implementation of this *Management Plan* is the Management Commission of WHOR; in the Action Plan included in this *Management Plan*, several responsible bodies for implementation of various activities, i.e., the MoEPP, Ministry of Culture, the 3 municipalities (Ohrid, Struga and Debarca), NP Galichica and others are mentioned. It is quite clear that the majority of the actions set out in the *WHOR Management Plan* have not been implemented, or at least only partially. To name some of those that remain undone: the adoption of the new *Law on Managing WH in the Ohrid Region*, the adoption of by-laws to regulate the permitted activities in the individual zones within the WH Site, the revision of the existing *Law on Nature Protection* and the strengthening of the capacity of the inspection services, and the establishment of a buffer zone around the WH Site. Also, several concrete, site-specific activities (for example, the construction of collectors for wastewater treatment etc.) remain unfulfilled.

To be more specific: out of a total number of 133 listed activities in the Action Plan, 56 activities should have been finalised or started by the end of April 2023 – but in reality most of them appear to not have started yet. Among those 12 activities where progress has been detected, the following should be mentioned: the new (draft) *Law on legalisation of illegal constructions*, the new *Management Plan for*

*NP Galichica, Valorisation study for SM, draft law for SM, draft Law on re-proclamation of Lake Ohrid as a Monument of Nature and draft management plan for the lake; new Management Plan for NP Galichica, and the Valorisation Study for the Lake Ohrid.*

On the basis of the information gathered; it can be undeniably stated that the *WHOR Management Plan* remains primarily a document from which few concrete tasks have been implemented.

#### *3.1.4. Strategic Recovery Plan for Revitalisation of Ohrid Region natural/cultural values*

The trans-boundary *Strategic Recovery Plan for Revitalisation of Ohrid Region natural/cultural values* has been finalised and adopted by the Government on 1<sup>st</sup> February 2023 and submitted on the same date to WHC. An Action Plan is part of this document (it has been since the first draft). The main goal of the *Strategic Recovery Plan* is to recover the affected values (for the natural heritage it would be the specific species and habitats, the landscape, etc.).

The mission notes that the *Strategic Recovery Plan* has not yet received comments from UNESCO and is therefore of indicative value only.

The key comments made by the Complainant on this Plan can be summarised as follows:

- There is no expert analysis of the threats (on the actual/specific values, like specific species, habitats), instead there is a general overview taken from existing documents;
- There is no monitoring plan for the effects of the proposed activities on the actual natural values, nor for the implementation of the plan. Instead, there is a description about the importance and role of the monitoring and its effects on the values and information on which institutions are responsible (these are almost the same as those mentioned in the WH Management Plan which has had very poor implementation and no monitoring since its adoption in January 2020);
- There is no budget for the envisaged activities.

#### Expert recommendations

● *The Strategic Recovery Plan for Revitalisation of Ohrid Region natural/cultural values should be revised by the expert body of UNESCO and complemented by a vision that will make it possible to maintain the defined OUV values for the Ohrid Region and to propose urgent measures for the revitalisation of the area.*

### **3.2. Key planning documents specific to the Lake Ohrid or Galichica Emerald Network sites**

#### *3.2.1. Valorisation Study for Lake Ohrid and Draft Management Plan for Lake Ohrid*

The preparation of a *Valorisation Study for Lake Ohrid* is a necessary condition for the updating of the 1977 *Law on Protection of Lake Ohrid, Prespa and Dojran* (which will result in the re-proclamation law of Lake Ohrid as a Monument of Nature), in accordance with the legal basis for nature protection in North Macedonia. In North Macedonia, this study is also the basis for the preparation of a modern management plan for the PA in question. In addition to an up-to-date overview and evaluation of the natural and other features of the area, the *Valorisation Study* is also an opportunity to determine the appropriate PA category according to IUCN standards, its primary and other management objectives, zoning and protection regimes.

The purpose of this report is not to make a comprehensive assessment of the scientific relevance of the *Valorisation Study* or the quality of the draft management plan prepared, as this would be beyond the scope of the mission, but rather to gather information on both documents and to assess the impact that both documents would have in ensuring a favourable conservation status for the species and habitats of the candidate Emerald Sites in the area under consideration.

The time, financial and content plan for the *Valorisation Study* project did not foresee the possibility of producing new expertise or updating existing databases. The latter is a major problem for Lake Ohrid, as the data collected on certain species and habitats show that some of the sources are completely outdated, that some species no longer exist on the lake, and that the extent and condition of the habitats

today is different from that indicated in the written and other sources used in the preparation of the two documents. Even the data in the Standard Data Form for the lake is unreliable and inaccurate; very often using information without an accurate indication of the geographical location, which obscures the real picture of the distribution or population size of certain species or status of the habitat type. Even endemic fish species in the lake are still considered to be 'data deficient'. However, more puzzling than the fact that the authors of the Study did not have an up-to-date and comprehensive database at their disposal (or perhaps were not familiar with all existing sources) are some of the conclusions concerning the severity of the threat status of the species and habitats in Lake Ohrid, which should be reflected in the appropriate protection and ecological restoration measures in the management plan.

As an example, given the dramatic decline of bird populations on the lake (IUCN, 2017), the almost complete disappearance of wetlands (Apostolova et al, 2016) and the presumed extinction of many of the lake's less visible species (Albrecht and Wilke, 2008) - to limit ourselves to just some of the conclusions of scientific research on the lake - it would make sense for the valorisation to clearly highlight that this is not a partial but a dramatic degradation of habitats and rapid local extinction of species in the lake area, for which the management plan should provide for appropriate protection and revitalisation measures.

The *Valorisation Study* was also used to determine the appropriate PA category for Lake Ohrid. In this process, the IUCN prescribes as a first step to verify whether the area meets the general IUCN definition of a PA, which is assessed on the basis of the primary management objective of such an area, where nature protection must take precedence over all other objectives in at least 75% of the area (Dudley, 2013). This step would be particularly meaningful for Lake Ohrid, where virtually all of the riparian zone is fragmented, and where nature protection-subordinate activities occur in a large part of the lake (fishing, tourism, etc.). In this respect, the relatively small proportion of the Zone of Strict Protection proposed in the *Valorisation Study* (11.9% of only mostly shallow waters, i.e. up to 50 m deep waters of the Lake Ohrid, but only in the part of the lake that belongs to North Macedonia) is of course far from the IUCN standard (which can be reached in due time, but should be clearly stated as a visionary goal). It is beyond the scope of this report to answer the question of whether the areas comprising the strict protection zone are adequately geographically located within the lake and on the shoreline.

It is also impossible to verify in the context of this report the adequacy of the envisaged protection regimes and use restrictions in certain zones. In particular, it is to be commended that the draft management plan establishes an internal zoning, including so-called no-fishing zones, and also restricts the way in which the lake is navigable (by vessels using less environmentally harmful propulsion). However, based on what has been seen when visiting the lake by boat, especially when sailing near some of the 'biodiversity hotspots', where the remains of large-scale picnics are visible on the shores (people can only reach these sites from the lake), it can be concluded that the lake should certainly be restricted even more firmly in the future to private boating.

The IUCN provides detailed guidance on PA management in the case of 'nested sites', i.e. where smaller PA are established within a larger one (Dudley, 2013). In such cases, it is, of course, sensible to take into account that the management of the 'nested site' should not be carried out in a way that would jeopardise the primary management objective of the larger site. In the case of Lake Ohrid, the wider site is a UNESCO *World Heritage Natural and Cultural site*, in which the *Lake Ohrid Monument of Nature* is nested. This, however, leads to a key shortcoming of the draft management plan for Lake Ohrid: the fact that the natural monument established on the Lake Ohrid must also be based and managed on the conservation of OUV which is determined on the basis of the different species and their habitats, and is not sufficiently evident. In other words, even maintaining a favourable conservation status according to the Emerald criteria must first ensure that the conditions for the conservation of OUV are met.

At present, in addition to the UNESCO WH umbrella site, there are several protected and conservation areas in Lake Ohrid and the surrounding area: the Galichica National Park, a UNESCO transboundary biosphere site, Lake Ohrid Monument of Nature, planned protected area Studenchishte Marsh, two candidate Emerald Network sites, a Ramsar site, and future Natura 2000 sites. All these sites are spatially uncoordinated with each other and, with the exception of Galichica NP, have no active management. The WHOR Management Commission (according to the law) has an advisory rather than executive/decision-making role. A management body to implement and supervise these decisions on the ground is badly lacking. All this creates confusion and, above all, allows responsibility for the poor

ecological situation to be passed from one to the other. This is particularly evident in the disparities between local and national policies and in the absence of effective cooperation between the different sectors.

It was explained to the mission that the emerging model for the re-designation of Lake Ohrid as a PA and the related management plan is also linked to the establishment of a management authority, which will also employ staff to carry out activities on the lake and patrolling. The Mayor of Ohrid Municipality explained to the mission during the meeting that they intend to establish a separate management body (including staff for supervision) for the future Studenchishte Marsh PA, which is only a few dozen hectares in size. This raises the question of how effective these management bodies, which will manage only a part of the umbrella WH site, will be, especially given that the boundaries between the different protected and conservation areas are often not consistent with each other. And meanwhile, parts of the site will remain without management. Perhaps a more effective measure would be to establish a qualified management body with powers to implement management measures and patrolling throughout the WH, and to manage the existing (and planned) protected and conservation areas within the entity as individual zones with well-defined management regimes.

### Expert recommendation

● Prior to the adoption of the *Management Plan for Lake Ohrid*, the provisions of the protection regimes should be reviewed, the implementation of certain activities that have a negative impact on the achievement of the primary objective of nature protection should be limited, and the size of the Zone of Sustainable Use should be reduced while the extent of the Strict Protection Zone be increased, in order to bring it more in line with the standards recommended by the IUCN.

#### *3.2.2. Draft Strategy for Tourism Development for the Municipality of Ohrid*

The purpose of collecting information on the *Draft Strategy for Tourism Development for the Municipality of Ohrid* (published in February 2022), as stated in objective 9 of the ToR for the Bern Convention mission, is not to check the quality of the product, but to draw attention to some inconsistencies and negative consequences for the status of species and habitats in the Lake Ohrid area that could arise if the current draft is adopted. It is also worth noting that this draft strategy was prepared before the comprehensive *Sustainable Tourism Development Strategy for the whole World Heritage area*, which should have defined the key criteria and concept of tourism development for the whole region, not only for the municipality.

The *Draft Strategy for Tourism Development with Action Plan 2020-2025* and related *Draft SEA Report* (in May 2022, MoEPP gave a positive opinion for the final SEA Report) proposes seven tourism development zones, among them also the “New Town” development zone – Studenchishte Marsh in which “opportunities for investments” include urbanisation and construction of a new marina.

The mission was not able to verify whether the complainant's concerns regarding the following facts were justified, as it was not provided with more recent documents or a written reply from the Ministry to the questions it had requested in advance:

- the SEA states that the location of the new marina should be in compliance with the (long outdated) *Ohrid General Urban Plan* (which envisages construction of a new marina in the area of the Studenchishte Marsh),
- it also states that the location of the new marina should be in compliance with the proposed zoning of Studenchishte Marsh (the proposed zone where in the current *Plan* the location of the new marina is a “zone of sustainable use”, which allows interventions such as construction).

The *Draft Strategy* calls for the preparation of a feasibility study to select the most suitable sites for the new marina and a new city plan for the selected site. No such study has been prepared, or at least not presented to the Mission even though the Mayor of Ohrid admitted during the mission that the new marina should not be constructed close to the Studenchishte Marsh.

The position of the authorities in regard to the *Draft Strategy* is that “...it exists only as a draft version, it has not been adopted by the Council of the Municipality of Ohrid and will not be adopted in the future

because the deadline for its implementation has expired, hence all allegations from this strategy should not be reviewed in this document.” This statement is not aligned with the State of Conservation Report, sent to UNESCO on 6.2.2023 in which the same authorities write: “As specified in the State of Conservation Report of the Natural and Cultural Heritage of the Ohrid Region (no. 35-484/6 dated 17.02.2022, submitted to the UNESCO World Heritage Centre), the Municipality of Ohrid prepared the Draft Strategy for Tourism Development 2020 – 2025.” and concludes: “After the document is finalized, it will be submitted for review to the World Heritage Centre and its advisory bodies.”

### Expert recommendation

● Prior to adoption of the *Draft Strategy for Tourism Development for the Municipality of Ohrid*, it is necessary to prepare and adopt a *Sustainable Tourism Development Strategy for the whole World Heritage area*, and at the same time to adopt a new *Ohrid General Urban Plan*, which shall not foresee any construction, especially a new marina, in the "New Town" development zone for the Studenchtishte Marsh area.

#### *3.2.3. New management plan for Galichica National Park*

#### Findings / Expert's conclusions:

The new (existing) *Management Plan for Galichica NP* was prepared by the park staff; 50% of the work was financed by PONT. In the preparation of the document, the drafters sought to respond to three key management challenges: they tried to follow international standards for PAs, they were aware that the plan should contribute to the preservation of the OUV, on the basis of which the majority of Galichica NP was included in the UNESCO WH Site, and they were looking for sustainable solutions for the protection and management of the NP area, in a context where the park does not receive any financial support from its founder, the Republic of North Macedonia, for its operations. The Park's budget is mainly made up of the contribution of PONT, the Park's own income and other project funds.

Despite good intentions, and unfortunately mainly due to factors beyond their control as the managing body for Galichica NP, the drafters of the Management Plan have only partially succeeded in achieving their objectives. One of the shortcomings of the Management Plan is that it only pays partial attention to the use of the international standards and recommendations for the preparation of such documents, and allows itself to interpret a whole series of these provisions in its own way, bypassing the very clear provisions of these standards.

The IUCN standards for PAs stipulate that a PA category is only designated after it has been verified that the area meets the IUCN definition of a PA (Dudley, 2013). In practice, in the light of the IUCN standards, this means that 75% of the area is being managed to meet the primary management objective (which, for IUCN cat. II National Park means that the conservation of natural biodiversity and natural processes in 3/4 of the PA takes priority over other uses in the area). Given the zonation of the area as defined in this *Management Plan for Galichica NP*, it is clear that the primary management objective is not being implemented in the required 75% of the National Park.

The drafters of the plan have divided the park into zones, but at least two of the zones (A and B) are in clear contradiction to IUCN standards in terms of the activities that can be carried out in the primary management zone. The strict protection zone, where no interventions that would interfere with natural processes (e.g. forest growth and death without logging) are allowed, covers only 10% of the park. It can be considered a success that the park managers have managed to get the NP staff to stop felling trees within the park to finance the work of the park and the costs of the staff, but commercial and/or industrial logging by the owners should also be banned. But logging is just one example of the interpretation of international standards for PAs, which this *Management Plan* interprets in its own way. In fact, the park also allows a number of recreational and tourist activities that the drafter of the Plan apparently did not find objectionable, even though they pose a direct threat to both the natural biodiversity and the natural processes of the park. These include, inter-alia, off-road driving, ATV, various recreational activities (including the organisation of the mass event – the Ohrid Ultra-Trail Marathon, which is partly organised in the areas of the highest conservation values inside the National Park), as well as the construction of buildings.

As for the last one (construction within the NP), it can be said that the park management (which gives consent for construction) has undefined rules or is less strict towards the expansion of construction in individual zones of the park (which, however, exceed the maximum recommended by international standards of up to 25% of the Park's territory), but it tries to prevent the expansion of illegal constructions in the strict protection zone right next to the lake, and in the area of biodiversity hotspots such as the settlement of Peshtani. Here the Park management is completely helpless, as all reports to the competent inspection and authorities about the expansion of illegal buildings receive no response.

Many of the commercial activities allowed in the Management Plan are certainly due to the fact that the park's founder (the Government of North Macedonia) does not contribute core funding for the management of the park, which is totally unacceptable. By establishing a national park, the State expresses the public interest in the protection of nature in a specific area and thereby also commits itself to providing funds for the fulfilment of this public interest.

In the presentation to the mission, the authors of the Management Plan pointed out the inconsistencies in the legal basis (especially evident, e.g., in the issuance of permits for construction interventions), the capacity and strength of institutions (e.g., the understaffing of the park's management body, the understaffing of the inspectorate, poor inter-sectoral cooperation, discrepancies between local and central authorities, the already mentioned lack of state funding for the management of the national park) and, last but not least, the influence of the political parties involved in decision-making regarding the management of the park.

In its 2023 report, the CSO SOS Ohrid wrote that Galichica NP could achieve its conservation objectives if: “...*the national park was facilitated—including financially—at the state level to prioritize conservation instead of being made to feel that it must act as a business and tourism development unit*”. This seems a very realistic statement.

#### Expert recommendations

- The management objectives of Galichica NP should be brought closer to the requirements of international standards and the *Law on Nature Protection*; the phasing out of the use of natural resources and the enabling of natural processes should be achieved in 75% of the park area (which should be clearly stated at least in the vision statement). The first step towards this goal is the introduction of a ban on logging in the majority of the park, where it is allowed under the current protection regime.
- The types and scope of permissible and inappropriate activities to be carried out in the different zones within the park should be redefined.
- Galichica NP authority should develop programmes to monitor the status of key species and habitats, and in particular to ensure that monitoring findings are reflected in day-to-day management practices and activities.
- Strict control and guidance of visitors in the park in line with nature conservation objectives should be introduced, preferring to focus on a smaller number of visitors who stay in the park for a longer period of time.
- A case-by-case approach should be adopted to deal with the issues of building permits and control/removal of illegal constructions, and the Galichica National Park's efforts should be supported by both local and central government, including a ban on further urban expansion of existing villages within the NP.

### **3.3. Specific sites and projects**

#### *3.3.1. Studenchishte Marsh and the draft Law to proclaim it as a Protected Area*

##### Significance of the Studenchishte Marsh (SM)

The *draft Law on Proclamation of Studenchishte Marsh as a Nature Park* (IUCN cat. IV) is currently in the procedure of adoption by the Assembly of the Republic of North Macedonia. Looking at the marsh in its present state, it may not be immediately obvious the conservation value of this area in the past - which, despite its degradation in recent decades - still retains great biodiversity potential, especially if

certain conservation and ecological restoration measures are implemented. Unlike most of the coastal reed stands (which are unfortunately largely destroyed or fragmented along the entire shoreline of Lake Ohrid), the ecological character of the SM is slightly different: it is a uniform, wider, with a high density of reeds per surface unit, forming a distinct habitat type (in contrast to most of the other reedbeds along the shore of the lake, one dimension of which (that part extending into the lake) is relatively narrow). It is easy to say that, before the degradation, the marsh was a reliable and attractive nesting site for, e.g. waterbirds (and other animal groups, e.g., dragonflies). Such species are present at other parts of the lake, but the reed beds elsewhere are not dense and extensive enough to provide suitable nesting conditions for several water birds, or an important bird-migration stopover point. Several of the most important values that are detailed in the *Study of Valorisation for Studenchishte Marsh*, i.e. endemic species of planarian worms, diatoms, gastropods and certain fish species, are actually recorded for Studenchishte Canal and Biljanini Springs.

### Findings

It is not surprising that the SM is listed as one of the nine biodiversity hotspots on Lake Ohrid, but what is more surprising is that the connection of this wetland with its neighbouring biodiversity hotspot, the Mazija area, is not more clearly expressed. The key point for both of these biodiversity hotspots is that their existence is vitally dependent on their connection to fresh water, in this case, in addition to the lake water, the Studenchishte Canal. Although they are quite different biodiversity hotspots in terms of species composition and habitat representation, this division into two biodiversity hotspot areas may have negated the important role that the Studenchishte Canal plays for both areas.

Uncontrolled urbanisation, agricultural expansion, reduced freshwater inputs (due to the interrupted flow of lake water due to the construction of the promenade separating the marsh from the lake and the limited flow from the Studenchishte Canal) and pollution are encroaching into the heart of the SM and turning it into terrestrial reedbeds, which are essentially of lower biodiversity value than the reedbeds that thrive in the water.

Open water areas in the SM area today are less than 10% of the total area. Agriculture in such a small and fragmented wetland area is not a compatible activity where the objectives of preserving the ecological character of the wetland should prevail over all other land-uses (even if it were to be carried out in an 'ecological manner' as some expect, which is unlikely given the generally low implementation of regulations and provisions in the Ohrid Municipality).

The impact of pollution, both sewage and solid waste, is evident; the open water areas in the SM are covered in several places with a layer of algae, which is an indicator of the highly trophic state of the water. The high density of motorised vessels in the canal certainly does not contribute to the water quality in the Studenchishte Canal, the SM and the Mazija area; there, motorised boats cause further wave damage on the lake habitat and plants.

Urbanisation threatens the already minimal area of the SM from all sides. Within the SM, which currently has the status of temporary protected area, two new residential buildings were under construction at the time of the visit on the border with the Gorica North area (photo 1). There are even more constructions within the Gorica North area, which would have to take on the role of a buffer zone (suitable for organic agriculture, for example), not an urban zone, if the SM is to be preserved. There are a large number of various constructions and structures (photo 2) within the SM which - due to unclear legislation - are not even considered as 'construction' for many of them, although their negative impact on the ecological character of the marsh is very high.





*Photo 1: Two new residential buildings under construction on the border with Gorica North area. @A.Sovinc.*



*Photo 2: Constructions and structures within the Studenchishte Marsh. @A.Sovinc.*

As mentioned previously, vague planning documents (*Draft Tourism Development Strategy for the Municipality of Ohrid*) even talk about the construction of a new marina in the Studenchishte Canal, which would further threaten the existence of the SM. However the Mayor of Ohrid assured the Mission that the marina would not be built there, and the Government reaffirmed this by referring to the

Management Plan for the World Natural and Cultural Heritage of the Ohrid region (2020-2029) where it is indicated that “a strong threat to the values of the lake are the plans of the Municipality of Ohrid to build a marina on the area of Studenchisko Marsh”.

The biggest blow to the marsh character of the SM has been dealt by the totally inappropriate development of the pedestrian promenade along the shoreline of the lake. The concrete and soil-filled base of the promenade interrupts/prevents the regular and sufficient flow of lake water into the SM. Field inspection revealed rapid drying of the land and conversion of wetland to land in a relative short period, which was probably accelerated by the restriction/prevention of the lake's water flow due to erection of the promenade. With the drastic shortage of freshwater inflows into the SM, the need to link up with Biljanini Springs (where the springs of the Studenchishte Canal are) and its inclusion in the SM PA is even more urgent. The promenade attracts, especially in the summertime, a (too) large number of visitors, which is an additional nuisance to the already fragmented area of the SM (crowd, noise, dogs entering into the SM...). The mission also observed motor vehicle tracks parallel to the asphalt promenade, which means further un-mediated habitat destruction and additional disturbance to the SM.

The mission was able to observe a number of other irregularities; although the Municipality of Ohrid is to be commended for the temporary closure of the cafés on the shore in front of the SM. Unfortunately - as in many other places on the lakeshore - the facilities have not been removed; instead, a number of new constructions (mainly for agricultural purposes as temporary objects) have been seen near the heart of the SM area).

#### Expert's conclusions

The *draft Law on Proclamation of Studenchishte Marsh as a Nature Park* (IUCN cat. IV) - currently in the procedure of adoption by the Assembly of the Republic of North Macedonia - is not in line with international standards for PAs (IUCN), and in particular this draft does not contain the necessary provisions to prevent further devastation of the SM. In brief:

The zoning of the area is contrary to IUCN standards and does not guarantee that the area will continue to be maintained as a wetland habitat. Only less than 10 % of the site shall be strictly protected under the draft law, while the adjacent parts largely allow those activities that are most destructive to the ecological character of the site.

The SM area is too small territorially to achieve the nature protection objectives and at the same time to allow activities such as agricultural use and (eco)tourism (which is not the same as controlled visitation) in most of the area.

The SM is cut off from regular and sufficient water sources, and therefore the habitat fragmentation and transformation of the wetland into land is accelerating, and the cultivation of the land for agricultural use and the consequent use of agrochemical additives is only speeding up this process.

Not all ecologically important parts that, together with the SM, form a coherent and functional wetland are included in the draft Law.

This ecologically sensitive wetland area should be surrounded by a buffer zone which should also include the Gorica North area, where development should be prohibited and organic farming and nature friendly forms of tourism could be allowed.

Although the ecological character of the Studenchishte Marsh is changing rapidly, the answer to this is not to abandon protection or to set up loose protection regimes, but to establish an effective, comprehensive and well-managed PA where ecological restoration interventions will be implemented without delay to reduce the threats and address their consequences. The first step towards achieving this goal is therefore the establishment of a PA, followed by the preparation of a management plan and the implementation of its provisions.

#### Expert recommendations:

- Any agricultural use, i.e., the opening up of new arable land at the expense of meadows and reedbeds, any use of agrotechnical means and the erection of temporary and/or permanent structures (with the exception of controlled mowing or grazing with a limited number of grazing animals) should not be

included in the provisions of the new draft law on the protection of the SM. All existing structures must be removed, together with waste.

- The law should recognise that the SM protected area will have to be supported by certain maintenance and technical works to maintain the necessary conditions for the existence of habitats and species for some time to come and should include requirement to reconnect with Lake Ohrid.

### 3.3.2. Gorica North project

#### Findings

Gorica North is the name of the 17.5 ha large area bordering the Studenchishte Marsh to the south. According to the Gorica North Urban Plan (outside of a settlement) the area is planned to become a tourism settlement with multiple accommodation constructions (68% of the area is set to be urbanised). The SEA for this large-scale tourism development has been approved by MoEPP already in September 2021. An assessment of the possible impacts of the Gorica North Urban Plan on the neighbouring Studenchishte Marsh has not been performed in the SEA.

#### Expert's conclusions

For the highly fragmented and sensitive wetland of Studenchishte Marsh, Gorica North plays the role of an essential buffer zone against harmful impacts to the wetland character. Potentially, part of the area in its current state could even be restored as an extension of the Studenchishte Marsh. The location is part of the very limited terrestrial habitat that is included in the *Lake Ohrid Wetland of International Importance under the Ramsar Convention*. Several threatened species are still found there, including the European pond turtle (*Emys orbicularis*) and the Macedonian crested newt (*Triturus macedonicus*).

### 3.3.3. Strictly protected area of St. Naum springs

#### Introduction and significance of the St. Naum Complex

The subaquatic and terrestrial springs of the Black Drim form a lake near the monastery of St. Naum. The area is a cultural and biodiversity hotspot, a core component of the WHs Site's OUV. The Springs of Saint Naum provide suitable environment for specific flora and fauna, several of which are believed to have evolved in situ; at least 30 species that exist nowhere else except Lake Ohrid are recorded for Saint Naum and some are only known for the springs themselves (Albrecht and Wilke, 2008).

*Angelica palustris*, a plant species that is critically endangered at national level is only found in the springs' vicinity, but its habitat is severely threatened by trampling from too many visitors, resembling typical mass tourism patterns and loss of its habitat due to encroachment (Matevski et al., 2019). Other threatened species at the national, European or global level include *Emys orbicularis* (VU), *Testudo hermanni* (VU); *Podiceps grisegena* (VU), *Podiceps nigricollis* (VU); *Lyhnidia gjorgjevici* (EN), *Gyraulus fontinalis* (EN), *Ohridohoratia polinskii* (VU), *Ohridohauffenia sanctinaumi* (EN), *Pyrgohydrobia sanctinaumi* (VU); *Lutra lutra* and *Ursus arctos* (VU); (National Park Galichica, 2022). Gastropod species are one of the groups with the highest rates of endemism and some inhabiting St. Naum are believed to have a total global range of just a handful of Lake Ohrid springs.

In the context of the heavily degraded remaining wetlands in and around the lake, areas such as St. Naum play a particularly important role as a last refuge for many species that can no longer establish themselves elsewhere in the lake area. However, their existence in the St. Naum Complex is now severely threatened by the conversion of the area into a mass visitation point.

#### Findings

The area of St. Naum is included in the Zone of Strict Protection of the Galichica National Park, however the area of the small iconic island has been excluded from this zone to enable development of mass-tourism facilities such as floating restaurants.

The current image of the site shows a completely degraded natural environment that does not fall within the standards of OUV: on a small island that forms a key part of this special aquatic habitat, wooden

structures and floating restaurant platforms which have been erected without the necessary permits directly encroach on the Zone of Strict Protection.

Tourist activities are being developed on the island to an extent that is unacceptable for the conservation of the natural values (too many boats to transport tourists, promotion of activities to attract even more visitors, etc.). There are also traces of visitor movements outside the marked trails, e.g., right next to the habitat of the globally threatened *Angelica palustris*. Indirectly, the activities of the large restaurant also threaten the natural values by polluting the surrounding area (physical pollution from sewage, light and sound pollution). The Public Health Centre—Ohrid in its 2022 report exposed the main sources of pollution to Lake Ohrid and the Ostrovo Restaurant on the St. Naum Island is one of them.

The restaurant is connected to the malfunctioning sewerage system and a treatment facility which only treats wastewater mechanically. The water around the springs is full of algae, which is an indicator of poor water quality (Galichica National Park, 2022). A few years ago, various bacteria, including the notorious *Escherichia coli*, were found in samples taken near the restaurant.

#### Working version of the Special Management Plan for the St. Naum Complex

The working version of the *Special Management Plan for the Saint Naum Complex* was prepared by Galichica NP (May 2022) upon request of the Government.

A key weakness of the *Special Management Plan* is that it does not provide appropriate measures for the identified threats. In this report, we limit ourselves to the three main threats to the natural environment of the area mentioned in the *Special Management Plan*: habitat fragmentation and destruction, wastewater treatment and direct threats to biota.

- Key threats related to habitat fragmentation and destruction include constructions (including the Ostrovo restaurant complex) and increasing visitor numbers. The restaurant's current scale and capacity to cater for such a number of people is incompatible with the nature conservation objectives of the St. Naum area. The *Special Management Plan* does not offer a solution on how to reduce the scale of the Ostrovo restaurant facilities, which are even partly illegally located. As long as the restaurant's activities are geared towards supporting mass visitation to the area, there can be no compromise with the objectives of nature (and also cultural heritage) protection. The *Special Management Plan* does not impose restrictions on other activities that also encourage even more visitors (which already exceed the carrying capacity of the site), such as boating, and on the contrary even provides for the creation of an additional waterway for visitors.
- The installation of portable toilets is not a measure that would contribute comprehensively to reducing the risk of water and soil pollution from the restaurant and its guests. Limiting the number of guests and upgrading and efficiently operating the sewage treatment plant would be an appropriate solution.
- The *Special Management Plan* does not provide for effective measures for the protection and conservation of endangered species and habitats in the St. Naum Complex based on the identified threats. These should be based on direct (physical) protection of habitats (e.g. preventing access to the habitats of threatened species) as well as measures to reduce the number of visitors and to direct visitors to less environmentally sensitive areas.

#### Expert's conclusions

The field visit confirmed the findings of the *Special Management Plan* that the key threat to the St. Naum complex is too many visitors and the consequent destruction of the natural habitat to meet visitor needs.

The Ostrovo restaurant, partly even built illegally, with its offer and size, is a key disturbance to the natural features and biodiversity of the St. Naum complex, including the surrounding strict protection zone. The area of the complex is more akin to a mass tourism area than a first-class biodiversity site whose importance goes beyond local values.

There are too many boats available for visitors to navigate around the area of the springs and the large number of users and boat trips endangers the natural features. Opening up further waterways for visitor transport or extension or opening up of terrestrial paths (as proposed in the *Special Management Plan for St. Naum / the five-year Operational plan* (in the Programme for sustainable development and the Programme for information and education)) would pose an unacceptable threat to the ecological and landscape character of the area.

Many visitors to the St. Naum complex are only so-called 'passengers', who stop off in passing, as the area is located on a major transport link. Such visitors are primarily a burden for the site of special heritage and natural interest and it is not reasonable to promote their arrival.

The existing water purification system at the restaurant is not efficient and, in particular, not sufficient for the large number of visitors to the area.

Some species of endangered plants and animals and their habitats are directly threatened by physical disturbance, trampling and pollution. The monitoring of the implementation of the protection regimes is inadequate and insufficient to cope with the large number of visitors coming to the St. Naum complex.

#### Expert recommendations

- Immediate reduction of the capacity of Ostrovo restaurant to its original size when built, restriction of the existing and additional tourist offer (e.g. prevention of the opening of additional water routes, limitation of the number of boats) and the number of visitors to the area (perhaps through the establishment of an appropriately high entrance fee, especially for those visitors who only wish to see the site in passing) and the redirection of services to meet the needs of visitors (food and drink, car parks, kiosks, stalls, etc.) to the periphery of the area or outside the St. Naum complex.
- The operation of the existing treatment plant, to which all visitor and monastery facilities must be connected, needs to be upgraded to a full and functional water treatment process with adequate discharge of treated water and a defined timetable for supervision and maintenance organised on a regular cycle that is set down on paper.
- Action plans for the conservation and protection of endangered species need to be drawn up, including the establishment of quiet and 'no-go' zones and establishment of physical barriers, with appropriate nature conservation monitoring by Galichica National Park staff.
- Monitoring of physical, chemical, biological and ecological parameters of the springs should be established on a regular cycle, according to suitable scientific methodology that is repeated periodically so that reliable comparisons on the quality of the water and the ecosystems can be made across various timescales.
- The working version of the *Special Management Plan for the St. Naum complex* needs to be aligned with the national legal bases in the field of nature protection and with the *Management Plan for Galichica National Park* (especially proposals for the St. Naum area which are included in the SEA report of the Plan).
- Concrete measures for the protection of species and habitats should be included in the working version of the *Special Management Plan for the St. Naum complex*, together with a proposal for a monitoring plan to monitor the status and success of the measures.

#### *3.3.4. Information about the small hydropower plants (sHPPs) on River Koselska*

#### Findings

On 25<sup>th</sup> April 2023, the Mission visited the site of the HPPs on the River Recica, a tributary to the Koselska River which runs into Lake Ohrid. According to the information received during the visit, the site is located on the territory of the UNESCO WH. The Ohrid Public Health Centre lists this river as one of the sources of pollution of Lake Ohrid in its 2022 report, indicating that the river is already polluted. The hydromorphological condition of the Koselska River is greatly affected by the withdrawal of water for the sHPP, as noticed during the visit (photo 3).

The Ministry of Economy has described this (and another) HPP as follows (30.05.2023): “sHPP on Koselska river is fully constructed, but it is still not put into operation, there is an ongoing procedure

for connection of the sHPP on the distribution grid. The Ministry of Economy has given only one concession for construction of sHPP on Koselska river. There is one other sHPP on the tributaries to the rivers flowing into the Ohrid Lake, it is the sHPP No.378 Recica and Grmeshnica. The Ministry of economy does not have information on the concession agreements that were awarded by the Ministry of Environment.” In regard to the construction of sHPPs on the river Koselska and in general in the Ohrid region, the Municipality of Ohrid considers that concessions should not be granted.

#### Expert's conclusions

During the visit on 25<sup>th</sup> April, the Mission noted that the water level of the River Recica / Koselska was at an average or even high level. The complainant provided the Mission with photographs showing that the riverbed had been almost dry only a few days before the visit. In the discussion with the local residents it was confirmed that the water level had risen only shortly before the planned visit of the Mission and that in the period before the Mission there was almost no water discharge in the riverbed. The mission found green plants in the channel just upstream of the sHPP, which do not normally thrive in a channel that is permanently or for a long time flooded (see Photo 4). This confirms that the channel had been drained for a long period of time or with a very low flow before the arrival of the Mission.

North Macedonia in its Progress Report on the Implementation of Recommendation no. 211 (2021)<sup>3</sup> of the Bern Convention in August 2022 stated that “for all infrastructure projects in protected areas, Emerald and outside them, in accordance with national legislation that is harmonized with the EU, a procedure for a Strategic Environmental Assessment as well as an Environmental Impact Assessment is conducted, which determines the impact on the environment and recommends measures to reduce the impact on the environment”.

The *Strategic Recovery Plan for Revitalisation of Ohrid Region natural/cultural values* foresees the revision of the concessions for sHPPs and consequently the amendment of the *Law on Nature Protection*, which is undoubtedly an important contribution of North Macedonia to the fulfilment of its obligations in the field of nature protection.



Photo 3: Withdrawal of water for the sHPP – River Recica. @A.Sovinc.

<sup>3</sup> <https://rm.coe.int/2021-rec-211e-north-macedonia-case-files/1680a4c288>



*Photo 4: Recently flooded green plants upstream of the sHPP on the River Recica are indicators of formerly dry stream. @A.Sovinc.*

### *3.3.5. European corridor VIII railway project and A2 highway project*

For more detailed information on the status of construction of the European Corridor VIII railway project and the A2 Highway project, please refer to the reply of the Government of North Macedonia dated 3.2.2023 - *State of Conservation Report of the Natural and Cultural Heritage of the Ohrid Region and report on the progress in the implementation of the recommendations from the World Heritage Committee Decision (44 COM 7B.77)*. The Government says that the requirements of the UNESCO RMM to North Macedonia and Albania in 2017 for the preparation of a new Feasibility Study, which should also include a search for an alternative route, are also taken into account in the requests of the railway Corridor VIII project co-financiers. The response of the Government indicates that the Feasibility Study is not expected to be completed until 2024.

No answers were provided to the questions that the Bern Convention mission had previously addressed to the Government regarding the preparation of the EIA for the adopted route and whether a HIA had been carried out in this process (and if so, whether an independent revision of the HIA had also been carried out).

For the section of the state road A2, Trebenishta - Struga - Border Crossing Qafasan, the Government of the Republic of North Macedonia has awarded the design and construction to the strategic partner Bechtel and Enka JV. The decision on the construction is based on the *Law on the Determination of Public Interest and the Nomination of a Strategic Partner for the Implementation of the Project for the Construction of the Infrastructure Corridor 8*. The Public Enterprise for State Roads has communicated to the strategic partner the decisions of the UNESCO WHC, which, according to the Government, provide sufficient assurance that "the future project would be in compliance with the recommendation of the Action plan from the Management Plan - "Planning of the route of highway A2 freeway and measures to mitigate the impacts on the environment and cultural heritage, in synergy with the selection of the railway route Kichevo - Lin railroad line" and in line with the Recommendations 2 and 3 of the RMM 2017". Further, the government reports that "the Public Enterprise for State Roads will continue to cooperate with state authorities and UNESCO regarding the design and construction of all state roads within the boundaries of the region" to ensure "a common approach to determining any possibilities for creating a single corridor for the planned transport infrastructure within the region (especially in the

Struga Valley)" and that "the continuous implementation of the recommendation from the Action Plan of the *Management Plan for the Natural and Cultural Heritage of the Ohrid Region* - Including the Commission for Managing the World Natural and Cultural Heritage of the Ohrid Region in all phases of planning infrastructure projects (Recommendation no. 3 of the RMM 2017)" is ensured.

The Bern Convention Mission addressed written questions to the State Authorities in advance of the visit to Skopje and Ohrid, inquiring whether the upgrading of the existing road between Struga and the Albanian border was being considered, rather than building a new highway (in accordance with the UNESCO Recommendation 2), and also asked for a copy of the relevant study- no response was received. The mission also did not receive a response on whether the cumulative impacts of the railroad and the A2 highway on the OUV of the property had been assessed in order to justify the decision not to couple them or to change their routing to bring them closer together in the northern part of the property, as requested in UNESCO Recommendation 3 (2017).

The Mission is pleased to report that UNESCO Recommendation no.4 on permanent abandonment of plans for the construction of sub- sections (a) and (e) of the A3 road and suspension of construction of other sub-sections of the A3 road until all appropriate measures are taken to avoid and minimise their potential impacts on the OUV of the Property appears to have been addressed, as the A3 road from Ohrid to St. Naum was not completed, although the formal deletion of this project was not confirmed during the Mission. The A3 road, however, is not part of Corridor VIII.

#### Expert recommendations

- A comprehensive SEA, including a cumulative impact assessment of all planned infrastructure interventions (railway and highway A2 from Corridor VIII, transmission line, gas pipeline), should be carried out prior to project approval and should be verified by independent experts.
- The 2017 UNESCO/ICOMOS/IUCN mission recommendation to upgrade the existing Struga - Kjafasan road route and/or pairing the railway and the highway further away from the shores of Lake Ohrid should be reconsidered.

### **3.4. Progress in response to recommendation no. 211 (2021) of the Standing Committee, adopted on 3<sup>rd</sup> December 2021, on conservation measures within national parks in North Macedonia, including in relation to Mavrovo National Park and Lake Ohrid and Galichica national park.**

The adopted [Recommendation No. 211 \(2021\)](#) on conservation measures in the National Parks in North Macedonia contains 13 recommendations to the Government of North Macedonia and one recommendation to the Standing Committee of the Bern Convention (which was fulfilled with the implementation of this mission to Lake Ohrid and Galichica NP). Only recommendations 6, 11 and 12 do not also refer to Lake Ohrid and Galichica NP.

Recommendations 1 and 2, which refer to the inadmissibility of sHPPs in WH Sites, were not taken into account during the construction of the sHPP at the Koselska River. This river is located on the edge of the Ohrid World Heritage Site, affecting the territory of the site. The mission was also able to see firsthand that Recommendation 3 is not being met on this river: the proper transposition of the EU Water Framework Directive into national law regarding the ecological flow of rivers and the prevention of excessive water abstraction in rivers within or affecting WH Sites and Emerald Candidate Areas. It was evident that this river had been nearly dry just days before the visit. The new *draft Law on Water* will hopefully contribute to definition of the ecological flow of rivers and its implementation in practice.

Recommendation 4, that core funding for the operation and management of national parks in North Macedonia should come from the state budget, is still pending.

During the visit, the mission heard from the Complainant and other NGOs that "the process for all forms of impact assessments in national legislation has not been strengthened". The compliance of those assessments with the standards for PAs and WH sites is questionable (e.g. SEA for Gorica North). This issue was highlighted in Recommendation 5.



There has been no progress in implementing Recommendation 7: further extensions for applications for legalisation of objects built without permission in PAs and World Heritage Sites can be seen in the area of Lake Ohrid and Galichica NP.

There are two clear examples of non-compliance with Recommendation 8 on compliance with international standards for PAs, which proposes at least 75% of the total area of the PA as the primary management zone; these values are not met by the proposals for the Lake Ohrid Monument of Nature, Studenchishte Marsh protected area and Galichica NP Management Plan.

There is not yet a harmonisation of spatial and sectoral plans, particularly in relation to tourism and urban settlements, to prevent further urbanisation and degradation within NPs and PAs and to promote sustainable, environmentally friendly forms of tourism in these areas, as called for in Recommendation 9.

Recommendation 10 speaks of the need for an independent review of the entire legislative framework for spatial and urban planning, buildings, environment and nature protection, which has not yet happened. The mission also perceived major gaps in cooperation between the different sectors and between central and local authorities, as well as in the attitude of the authorities towards civil society, which is the essential content of Recommendation 13. The mission was not provided with evidence of successful cooperation with the Republic of Albania, with which North Macedonia shares a part of Lake Ohrid, although cooperation between the two countries is necessary to ensure the ecological character of the lake.

#### 4. GENERAL CONCLUSIONS

Infrastructure and urbanisation developments at Lake Ohrid and Galichica National Park have reached an alarming degree of negative impact that directly and indirectly threatens the populations and compositions of endemic and native species of both proposed Emerald Network sites, including at the nine biodiversity hotspots as recorded in the WH lists (and noted in other key documents).

Existing structures and their operations are contributing to loss of habitat, increases in disturbance, decreased nutrient buffering capacity, modified riverine flow, and disconnection between habitats, including from Lake Ohrid to its terrestrial context. These frequently bring additional general pressures due to the proliferation of activities and facilities for mass tourism and the inadequate collection and treatment of wastewater, which become acute at locations where visitor attractions and biodiversity hotspots converge, visibly at Saint Naum, Mazija and Studenchishte Marsh, but presumably at other locations, too. Without remediation, impacts are predicted to significantly worsen due to the incremental expansion of legal and illegal objects and the several planned infrastructure and urbanisation projects such as the Gorica North development.

Strategic, planning and management documents follow only to a limited extent the UNESCO/ICOMOS/IUCN mission recommendations and interpret in their own way the standards for the protection and management of internationally recognised spatial entities (such as Emerald Sites, World Heritage Sites, Biosphere Reserves, Ramsar Sites, IUCN standards for nationally protected areas). Heritage and Environmental Impact Assessments are frequently deficient or absent. The various documents are accumulating and the implementation of their provisions in practice is weak or non-existent.

Addressing shortfalls requires establishment of a body with decision-making and executive functions for OUV-based management of the entire WH site; direct state funding for PAs; redesign of the legal bases for protection, sustainable urban planning, transparent procedures for legalisation of illegal objects and constructions; establishment of WH sites as no-go areas for hydropower; accelerated identification and removal of harmful illegal constructions; reconfiguration to an OUV-based urban-planning regime; harmonisation of management documents into a detailed and synchronised hierarchical unit with clear deliverables; strong entry controls for PAs and high-level zones; application of international standards for nature conservation objectives in all PAs; strengthened activity restrictions in Sustainable Use Zones; targeted monitoring to the species level; and supplementation of valorisation studies and PA draft laws to expedite conservation of nested sites in the wider WH site.

In particular, the *Valorisation Study for Lake Ohrid* needs reassessment of the actual site conditions, including level of degradation and species locations/populations, to form more reliable practical conclusions for the conservation of OUV.

Revisions to the *Strategic Recovery Plan* should be carried out by an expert group and focus on improvements to analysis of threats, precision of measures and establishment of responsibility mechanisms.

Reworking of the *Management Plan for the Natural and Cultural Heritage of the Ohrid Region* should aim to provide a strong protective template to guide alignment of urban planning documents.

The final version of the *Special Management Plan for the Saint Naum Complex* requires removal of measures that risk increasing pressures and insertion of key actions to reduce them like relocation of visitor attractions, visitor flow controls, monitoring, action plans for threatened species, and complete capture/treatment of wastewater.

Finally, the proposed *Law on Proclamation for Studenchishte Marsh as a Nature Park (IUCN cat. IV)* will need substantial redrafting to ensure that perimeters and zoning fully include its present and potential values by including all integral wetland features, ensuring habitat connectivity, buffering the PA from stressors, and deactivating uses that are incompatible with protection.

## 5. MISSION'S RECOMMENDATIONS

Averting local and total species extinctions should be achieved through, but not limited to, **all aspects** of the following recommendations, which have taken into account Bern Convention Recommendations [No. 157 \(2011, revised in 2019\)](#) on the status of candidate Emerald sites and guidelines on the criteria for their nomination, and [No. 208 \(2019\)](#) on detecting, reporting, assessing and responding to changes in the ecological character of Emerald Network sites, the [Post-2020 Strategic Workplan for the Emerald Network](#) as well as fellow Major Environmental Agreements' recommendations such as the reports of the [Reactive Monitoring missions](#) of WHC/ICOMOS/IUCN in 2017 and 2020 and IUCN guidelines. These recommendations supplement those of [Recommendation No. 211 \(2021\)](#) on conservation measures within national parks in North Macedonia, which should continue to be implemented in parallel:

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.
2. 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.
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 Revitalisation 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.
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.
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.
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.
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.

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 neighbouring countries.
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.
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.
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.
15. 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.

**ANNEXES**

**- Programme -**

**Day 1: 25 April 2023**

Location: Ministry of Environment and physical planning / MoEPP (meeting room 7 floor)

<b>Time</b>	<b>Subject</b>	<b>Presenter</b>
10.00-10.20	Welcome remarks – Minister  Bern Convention - Head of mission	Ms. Kaja Shukova, Minister of Environment and physical planning (MOEPP)  Mr. Mikaël Poutiers, Secretary of the Bern Convention
10.20-10.30	State's activities related to the Emerald Network	Ms. Marija Dirlevska Chaloska, Head of Biodiversity and GMO Unit, Bern Convention focal point - MOEPP
11:00-11:30	Valorisation study and proposal of the Law for the declaration of Studenchtishte Blato as a Nature park	Ms. Menka Spirovska, Dekons Ema, Prof. D-r Slavco Hristovski, Institute for Biology/PMF
11:30-12:30	Highway project  Draft law on urban planning Laws on legalisation of illegal constructions Corridor VIII railway project and A2	Ms Darinka Miteva, State roads agency  Ms. Ana Gjorgievska, Ministry of transport and communication Mr. Martin Ozaklievski, Ministry of transport and communication Ms. Ljubica Trajkovska, Ministry of transport and communication
12:30-13:30	<i>Lunch break</i>	
13:30 - 14:45	Management Plan for the UNESCO Ohrid Region  Strategic Recovery Plan for revitalization of Ohrid Region natural (and cultural) values  Small hydropower plants on the Koselska River	Ms. Ana Petrovska, Deputy Head, Waste Sector/ Ministry of Environment and physical planning  Mr. Zoran Pavlov, National Commission for UNESCO Ministry of culture  Ms. Magdalena Daskalova, Advisor for renewable energy sources, Energy Department, Ministry of Economy
15:00 – 17:30	<i>Transfer from Skopje to City of Ohrid/ Hotel accommodation</i>	

**Day 2: 26 April 2023**

Locations: Public enterprise National park Galichica, Municipality of Ohrid, field trip (Studenchtishte Marsh, St. Naum area, urbanisation of Ohrid side coast)

<b>Time</b>	<b>Subject</b>	<b>Presenter</b>
09.00-10.00	Welcome remarks  Management plan for Galichica National Park  Activities on Prespa Ohrid Nature Trust (PONT)	Location: Public enterprise Galichica National park  Mr. Andon Bojadzi, PE Galichica NP  Ms. Mirjam de Koning (PhD) Executive Director

		Prespa Ohrid Nature Trust (PONT)
10:30 -11:30	<p>Welcome remarks</p> <p>Bern Convention - Head of mission</p> <p>Illegal constructions across the protected areas</p> <p>Draft Strategy for Tourism Development for the Municipality of Ohrid,</p> <p>Urban documentation Gorica Sever</p>	<p>Location: Municipality of Ohrid / meeting room</p> <p>Mr. Kiril Peckarov – Mayor of Ohrid Mr. Mitko Korkutoski – Municipality of Struga Mr. Zoran Nogaceski- Mayor of Debarca</p> <p>Mr Mikaël Poutiers, Secretary of the Bern Convention</p> <p>Representatives from Municipality of Ohrid Municipality of Struga</p>
11:30-12:30	Visit to Studenchishte Marsh and the surrounding area (Studenchishte Canal and the marina)	<p>MoEPP Front 21/42 Municipality of Ohrid Ms. Jasmina Momirovska Mr. Kiril Iloski</p>
12:30-13:30	<i>Lunch break</i>	
13:30 -14:30	Trip from Ohrid to St. Naum, with a 10-15min. stop at Ljubansko Pole	<p>Galichica National Park MoEPP Municipality of Ohrid Front 21/42</p>
14:30-16:00	<p>Location: St. Naum complex</p> <p>Topics: Draft Management Plan for St. Naum complex.</p> <p>Raft Floating Restaurant in the strictly protected area of St. Naum springs</p> <p>(also walk around the port and visit the small church St. Elena and Konstantin area)</p>	<p>Galichica National Park MoEPP Municipality of Ohrid Front 21/42</p>
16:00	Boat trip along the coast from St. Naum to the Museum on water, and return to Ohrid by road	<p>OSA team Front 21/42</p>

### Day 3: 27 April 2023

Location: Field visit – Small HPP r. Koselska and Struga part of the coast

Time	Subject	Presenter
09.00-10.00	Trip from Ohrid to small HPP Koselska, with 15 min. stop at the HPP site	<p>Municipality of Ohrid MoEPP Front 21/42</p>
10:00 -12:30	Urbanisation (old road Ohrid-Struga) – Podmolje hotspot; Kalishta 1 hotspot;	Mr. Mitko Korkutoski, Municipal inspector for the environment, Municipality of Struga

	Kalishta 2 hotspot; Camp Treska – corridor 8 railway; Radozda Daljan	MoEPP Front 21/42
12:30-13:30	<i>Lunch break</i>	
14:30-17:00	Meeting with civil society stakeholders	Front 21/42 Ohrid SOS MES Akvatek – divers’ organization Dosta, citizens' initiative, Struga ED Grasnica
17:00 – 17:30	Wrap up meeting	OSA team MOEPP Front 21/42
18:00 –20:30	<i>Transfer from City of Ohrid to Skopje</i>	

**Post-OSA: Online Call with IUCN – 2 June 2023**

11:00 – 12:00	9 hotspots of the biological diversity of Lake Ohrid  The Valorisation study for Lake Ohrid and Draft Management Plan	Mr. Daniel Bogner, Mr.Pietro.Sandini IUCN (International Union for Conservation of Nature) Regional Office for Eastern Europe and Central Asia (ECARO)
---------------	---	--

**- Bibliography -**

Albrecht and Wilke, 2008: Ancient Lake Ohrid: biodiversity and evolution. *Hydrobiologia*. Volume 615, 103–140.

Apostolova et al, 2016: Studenchishte Marsh as an Integral Part of Ancient Lake Ohrid: Current Status and Need for Protection. *Wetland Science & Practice*, 33 (2), 35-35.

Dudley, N., Shadie, P. and Stolton, S., 2016: *Guidelines for Applying Protected Area Management Categories including IUCN WCPA Best Practice Guidance on Recognising Protected Areas and Assigning Management Categories and Governance Types*. Best Practice Protected Area Guidelines Series No. 21. Gland, Switzerland: IUCN.

IUCN, 2017: World Heritage Outlook: Lake Ohrid. Gland, Switzerland.

Matevski et al., 2019: *Angelica palustris*. The National Red List of North Macedonia. Ministry of Environment and Physical Planning, Skopje, Republic of Macedonia.

State Statistical Office for the Republic of Macedonia, 2021: Census of Population, Households and Dwellings in the Republic of North Macedonia 2021: First Dataset. Skopje, Republic of Macedonia.

State Statistical Office for the Republic of Macedonia, 2022: Illegally built constructions on the territory of the Republic of North Macedonia, 2021. Skopje, Republic of Macedonia.

State Statistical Office for the Republic of Macedonia, 2022b: Issued building permits. Skopje, Republic of Macedonia.