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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

43<sup>rd</sup> meeting

Strasbourg, 27 November - 1 December 2023

**Open case-file: 1995/6**

**Akamas Peninsula  
(Cyprus)**

**-REPORT BY THE COMPLAINANT-**

*Document prepared by Terra Cypria*

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Το Κυπριακό Ίδρυμα Προστασίας του Περιβάλλοντος  
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The Cyprus Conservation Foundation

Working for a sustainable Cyprus

18 August 2023

### **Open case-file 1995/6: Cyprus: Akamas Peninsula Bureau Report**

Following the adoption on 18 November 2016 of the new *Recommendation No. 191 (2016) of the Standing Committee on the conservation of the Akamas peninsula and the sea turtle nesting beaches of Chrysochou Bay [T-PVS (2016)29]*, we would like to inform the Bureau that we believe that for another year the Republic of Cyprus has not yet implemented the 13 points of the Recommendation.

At the same time, for some of them it is evident that the Government is not willing to implement them and for others not well organised to implement them fully and in accordance with the Recommendation.

#### **Brief account of current situation regarding Akamas and Limni.**

**As we do every year a more detailed report will be submitted for circulation to the Standing Committee within the set deadlines.**

#### ***Akamas***

The Government is still unwilling to expand the current Natura 2000 boundaries and, furthermore, is unwilling to declare the whole of the Akamas Peninsula as an IUCN national park, an UNESCO biosphere reserve, or a protected area with comparable international protected status (Rec. 1). The area which is proposed to be designated as a National Forest Park is 7.662 hectares (ha), and as explained in the past, the terrestrial Natura 2000 has diminished significantly from the initially proposed Natura 2000 area in 2003 (SCI CY4000010 and SPA CY4000023).

The first proposal in 1997 for an Akamas Biosphere Reserve included an area of about 23.000 ha (terrestrial). Then, and according to the project Special Areas of Conservation (Directive 92/43/EEC) in Cyprus (LIFE98 TCY/CY/172), between 1998-2003, the overall area of the proposed Natura 2000 area was 17.690 ha (terrestrial). The final Natura 2000 area for Akamas took place in 2010 and included an area of only 10.163 ha and finally as mentioned above, the National Forest Park is 7.662 ha.

At the same time the whole Peninsula and its Natura 2000 sites is fragmented between two Local Plans which one was published in February 2023 (Local Plan for the Akamas' Communities), and the other is under preparation (Pegeia Local Plan). The Local Plan for the Akamas' Communities outlines, amongst other things, where and what type of development can take place. The Town Planning and Housing Department has decided to fragment the Akamas Peninsula into two different Local Plans, despite the strong opposition of the authorities dealing with nature protection, as well as Environmental Non-Governmental Organisations (ENGOS) and other stakeholders. For example, the spatial planning of the Lara – Toxeftra Marine Protected Area (MPA) is fragmented into two parts, of which one includes Lara and the other Toxeftra. This development is in direct contradiction to the conclusions of the Report of the on-the-spot appraisal and page 7 last paragraph [T-PVS/Files (2016) 44], according to which: *a nesting site should be considered as a unit and managed as such. Since anthropogenic impacts are cumulative, any impact assessment should be also done cumulatively at the whole nesting beach level (i.e. a development plan of the entire area and with estimates of potential light pollution and human visitors at the beach). It should not be for individual sub-units (i.e. fragmented plans and single*

*projects), because each individual plan and project might be independently considered as sustainable and therefore approved. However, we believe that this would result in a non-sustainable overall effect by multiple projects.*

Additionally, the protection and management of the Natura 2000 sites seem to be treated by the government differently as two different types of Natura 2000 areas. The one type of Natura is within the state forest and the second type is all the other areas outside the state forest, mostly privately-owned. It needs to be stressed that for the latter type a lot of arguments are made due to the government's incompetence to reimburse private landowners, as promised after the Akamas Local Plan was published.

Following the points raised above as well as other factors mentioned below, the whole area still cannot be appropriately and holistically managed in a sustainable, integrated way thus, **point 2 of the Recommendation cannot be implemented**, Furthermore, large areas with important habitats and species, still, have not been designated as Natura 2000 areas and remain unprotected.

The Government, still, has not yet put into force any appropriate management measures through legally binding mechanisms (e.g. Decrees for the Protection and Management of the Natura 2000 areas, Site of Community Interest – SCI CY4000010 and Special Protection Area – SPA CY4000023 Akamas Peninsula). It is important to highlight that such measures are foreseen by the proposed Management Plans which still do not have legal force.

Moreover, there is no management body in place or an entity, with scientific staff and wardens, and no monitoring mechanism to react promptly to and stop any illegal activities that take place within the peninsula. Generally, the fragmentation of responsibilities between different authorities, results in a difficult /problematic coordination when several illegalities occur in Akamas Peninsula and Polis-Gialia areas. Currently there are no mechanisms in place to deal with issues like permits, supervision of permitted works and activities, early response and intervention, accountability, and imposing penalties and/or fines (Rec. 3).

As a result of the lack of controlled, organised and holistic management, there is also a lack of adequate patrolling within the area.

The signing of a Memorandum of Understanding (MoU) between the Department of Fisheries and Marine Research (DFMR) and our foundation last year, was put in a trial start this summer. Under this MoU, Terra Cypria is to be actively involved in the protection of marine turtles in Cyprus by recruiting, managing, training and guiding groups of volunteers who will be patrolling every day, during the nesting period, the turtle nesting beaches to locate possible nests and inform the monitoring team, they will be running informational and educational actions to sensitize the general public and the visitors at the nesting beaches, and assist in conservation actions. All actions were approved and monitored by the DFMR and special protocols were created to be followed. The presence of volunteers and the involvement of the public (locals and tourists) is expected to change the locals' mentality on the turtles and motivate them to protect the species since turtles will be seen as an attraction for their communities and not as a red flag. This year was a pilot year for the programme and adjustments will be made for the better collaboration between the acting members.

Like every year, same this year, umbrellas, tents and sunbeds are still seen at the nesting beaches, imposing a great threat to the turtle nests and even after the warrant time is in force. Since last year, rangers hired by the DFMR, are patrolling the nesting beaches of Lara- Toxeftra and Polis-Gialia and are authorized to issue fines on the spot and hopefully to discourage this illegal activity. The number of rangers though, cannot be considered adequate to cover the needs of all beaches, including weekends and overtimes, as was also noticed during the previous years where, after the rangers' shift is finished, umbrellas, tents and sunbeds are put on the beaches. Additionally, a sea patrolling must be put in place urgently since several boats approach too close to the nesting coasts, violating the Ministerial decree which does not allow boats to approach or anchor at less than 20

meters depth (excluding the coastal fishing boats) from the 1<sup>st</sup> of May until the end of October every year.

Another year goes by where the Government has not closed down or removed the illegal restaurants and beach bars within and adjacent to the Lara turtle nesting beaches, where they have been operating illegally for years. Even more, while driving in Akamas, one can see several advertisement signs of the illegal facilities as if they are legally operating (Rec. 9).

Through the National Forest Park of Akamas, official proposals foresee several upgrades of the road network and the creation of several new refreshment kiosks, snack bars and souvenir shops and parking lots throughout the Natura 2000 sites, including two kiosks within and adjacent to the Lara – Toxeftra Marine Protected Area (MPA). All these facilities, along with the upgrading of the road network, will increase the pressure from visitors thus the pressure on the Natura 2000 sites (Rec. 7). At the moment, the works for the National Forest Park of Akamas have started, leaving us with huge worries about the way they are being handled. Additionally, to the pre-existing pressures and threats to the area, we see a great disturbance by the works, also with no patrolling and/or monitoring. We see that no sufficient precautionary measures are being taken for the protection of species and habitats ex. sea turtle nests, sand dune systems etc., by what is being done, but on contrary, protection measures previously set to protect the area have now been removed, leaving Akamas, especially during the touristic period, open to all sorts of dangers. This year we have again seen quad bikes and cars on the sand dunes and turtle nesting sites. These works are expected to finish in 2024 and until then, the area must be closely monitored since the threats are high.

The Local Plan for the Akamas' Communities, published in February 2023, was given a 6-month period to be put into force, and within that period the government would investigate and suggest reimbursement options for the private land owners in Akamas, as a way to resolve once and for all, the strong reactions of the locals for losing their development rights within the N2K areas. The 6 months have come to an end and no measures have been proposed yet, leaving the Local Plan of Akamas exposed and the locals not trusting the procedures.

We need to say that worst has been avoided, at least for now, since what was initially proposed in the local Plan, was altered and adjusted in the final Local Plan.

Still, the Akamas' Local plan needs to be monitored since the objections on it by the private landowners remain. Also, a lot of pressure is imposed by the quarry owners, for the expansion of the quarry zone adjacent to Natura 200 area. The new Quarry Zone has not been approved at this stage by the Akamas local Plan but during the next three years the following will be studied:

- To what extent is the need to create a new quarry Zone of aggregates, in the area of Androlikou is imperative compared to available alternative placements.
- The conservation status of the area's species in relation to quarrying activities.

Upon completion of the above, it will be decided whether the creation of a new Quarry Zone in the specific area will be further discussed.

Despite the above, we believe this cannot be considered satisfactory for the protection of priority species since the option of a new quarry zone in the area still remains an option. This new quarry zone fails to justify its necessity and *other imperative reasons of overriding public interest* (Art. 6.4, 92/43/EEC), since there are sufficient reserves in the existing quarry next to the proposed new quarry, as well as in other quarries in other parts of Cyprus with less environmental sensitivity, and it not documented that there are no other alternative solutions.

Regarding the new quarry zone, the SEA states ((February 2021):

*«...alternative mining locations for the material have already been unsuccessfully proposed. Given the presence and potential impact on the priority species, Article 6(4) of Directive 92/43/EEC should be activated which requires the Commission's Opinion, to other imperative reasons of overriding public interest».*

The AA (February 2021) also states:

*«The operation of a quarry zone in an area adjacent to the Natura 2000 network will lead to permanent irreversible and widespread adverse effects on the species for which the area has been designated as a Natura 2000 site, due to human presence as well as noise pollution, explosions, vibrations, dust and the constant movement of heavy vehicles. It is estimated that the creation of the quarry zone will strongly affect the species of fauna (birds and bats) that use both the wider and the exclusive area».*

### **Limni Area**

Regarding the proposal for the construction and operation of two golf courses and associated development, including housing, a hotel, tourist and commercial facilities in Limni, the Government gave the green light to the private company to go ahead with its plans. This ignored the 500-meter zero building/lighting zone from the sea, which would have minimised lighting and human disturbance problems to the sea turtle nesting beach.

With the closing of the infringement case against Cyprus over the Limni bay on the part of the Commission, and the construction permit already granted by the town planning department, the green light was given to begin development. With the Bank of Cyprus being the new owner of the land and the planned project, it is still uncertain how the Limni bay project will proceed.

The concerns are great considering the granted construction permit and that an investor might buy at any time the licence and proceed with the development. With everything ready for development, the ecological importance of the area is still in imminent threat.

In this framework, we firmly believe and strongly encourage the Bureau to bring the file for discussion this December.

Thank you for your cooperation and please let us know should you require any further clarifications/information.

**Members:** Eurosite • IUCN - International Union for Conservation of Nature • EEB - European Environment Bureau • ECOS - European Environmental Citizens' Organisation for Standardisation • MEEdIES - Mediterranean Education Initiative for Environment & Sustainability

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