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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

42<sup>nd</sup> meeting  
Strasbourg, 28 November – 2 December 2022

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**Open 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

28 October 2022

## Complaint No. 1995/6: Case-file open on Cyprus: Akamas Peninsula

*Terra Cypria*-the Cyprus Conservation Foundation Report (November 2022)

Supported by: Federation of Environmental Organisations of Cyprus, BirdLife Cyprus, Cyprus Wildlife Society, Ecological Movement of Cyprus, Enalia Physis Environmental Research Centre, Friends of Akamas, Friends of the Earth Cyprus and Initiative for the Protection of the Natural Coastline.

### A. Introduction & Case Summary

This case covers the lack of protection for Mediterranean sea turtles (*Caretta caretta* and *Chelonia mydas*) that nest on the shores of both the Akamas Peninsula and Chrysochou Bay in north-western Cyprus, as well as other habitats and rare biodiversity across Akamas Peninsula. Both areas have been designated Sites of Community Interest (SCI) within the Natura 2000 Network (CY4000010 CHERSONISOS AKAMA and CY4000001 POLIS-GIALIA respectively). Both areas have been also declared as Special Areas of Conservation (SAC), while the Akamas Peninsula has also been designated a Special Protection Area (SPA CY4000023 ZONI EIDIKIS PROSTASIAS CHERSONISOS AKAMA), due to its importance for birds.

Between 1999 and 2002, the Government of the Republic of Cyprus carried out the project *Special Areas of Conservation (Directive 92/43/EEC) in Cyprus* (LIFE98 TCY/CY/172), in the framework of the funding instrument *LIFE – Third Countries 1992-2006* and in cooperation with the European Commission. As part of an initiative to combat the pressures and threats on important habitats and endangered species listed in the annexes of the Birds (79/409/EEC) and Habitats (92/43/EEC) Directives, the aim of the project was to gather information for the creation of a network of Special Conservation Areas (SAC) within the framework of the Natura 2000 Network. According to the project's final report, published in 2003, the overall area of the proposed Natura 2000 area in Akamas Peninsula **was 25,541 hectares (ha)**. However, the overall area of the Natura 2000 area in Akamas Peninsula (including both SCI CY4000010 and SPA CY4000023), which was designated by the Government of the Republic of Cyprus in 2009, is **18,082 ha**, of which 43.42% covers the marine area and 56.58% the terrestrial area. The Natura 2000 designated terrestrial area in Akamas Peninsula includes **10,220.51 ha**, of which **7,666.48 ha** is state forest land (75.01%), while 2,254.03 ha is private land (24.99%). Consequently, **only 50% of the terrestrial area that was initially proposed in 2003 is included in the Natura 2000 areas (SCI CY4000010 and SPA CY4000023) that were eventually designated in 2009.**

**Since 2009, several management plans that have no force of law have been drafted**, but not implemented. The reports from the Department of Environment to the Convention Secretariat refer to progress made, but the fact remains that **no effective and legally binding protection measures are yet in place**. A new management plan under preparation for the designated Akamas National Forest Park covers only the state forest land of Akamas, an area which corresponds to **75% of the Natura 2000** areas (SCI CY4000010 and SPA CY4000023). In addition, the area of Akamas is fragmented into two separate spatial planning schemes, since two Local Development Plans are currently under preparation by the Town Planning and Housing Department (one covering 90% and the other covering 10% of the Natura 2000 sites), as we explain in *Appendix I*.

As we note in *Appendix 1*, the Republic of Cyprus is not willing to adopt some of the provisions in the new 2016 Recommendation. More specifically, the Republic is not willing to declare the **whole of Akamas Peninsula** as a national park (IUCN) or a biosphere reserve (UNESCO), or any other reserve with comparable international status (point 1 of the Recommendation). Also, it is **not willing to establish an entity for integrated management** of the Natura 2000 sites (SCI CY4000010 and SPA CY4000023) and neighbouring communities (Point 3 of the Recommendation). Moreover, the Government **refuses to accept point 11** of the Recommendation which asks for an approximately **500-meter buffer zone, free of buildings**, between the proposed golf development and sea turtle nesting beach at Polis-Gialia Natura 2000 area (SCI/SAC CY4000001).

The Government's previous reports suggest that solutions to the current problems will be established under future management adjustments which are still not in place.

Also, regarding point 2 of the recommendation, the Government states that the new Local Development Plans will manage to ensure harmonious coexistence between nature and communities. In fact, and as we note in *Appendix 1*, the new **Akamas Local Plan has some worrisome policies and proposals**, allowing for several **developments outside the current local communities' boundaries**, which will not only **threaten the unique environment** of the area and the Natura 2000 sites, but also will **compete with local activities** (such as existing accommodation and dining, etc) located in the communities. At the same time, it offers no solutions to private land-owners within the protected areas.

We believe that **what is mostly needed first is the enforcement of the existing legislation**. The attempt to find solutions through new studies and particularly development plans, which are not directly connected with or necessary to the management of the Natura 2000 site, but likely to have a significant environmental impact and simply maintains the status quo of no proper protection and management as well as the presence of many illegal activities and embroils all stakeholders in a continuous vicious cycle.

Once again, we stress that there is **no adequate management, patrolling and/or protection of the Natura 2000 sites of Akamas Peninsula and Polis-Gialia area**. There is no mechanism and/or relevant body ensuring integrated management and conservation of the area. As a result, several illegal activities continue to take place in the area. Details about the illegal and/or uncontrolled activities that took and/or still take place are listed in *Appendix 1*. Additionally, for more than two decades, there is a lack of political will to "*close down illegal restaurants in the neighbourhood of the beaches of Lara and Toxeftra (including Aspros River)*", as stated in Recommendations No. 63 (1997) and 191 (2016) of the Standing Committee, adopted on 5 December 1997 and 18 November 2016 respectively.

At this point we must note that the Government has informed the Standing Committee that Point 9 of the recommendation, is monitored through prosecutions in courts. We do not agree with this solution since the long-standing illegalities continue their operations and the timeframe and the result of a court decision is unknown and may take many years to resolve. What we ask is an early response mechanism to be able to immediately intervene and stop illegalities when there are damages to sensitive species and ecosystems. Prosecution of illegal activities must act as an action in secondment to impose the relevant penalties, but in the meantime the government has no mechanism in place to stop damaging activities. We are underlying the fact that most of the illegal beach bars and restaurants, in the areas of Aspros River as well as Lara and Toxeftra beaches, **have been illegally constructed and are still illegally operating for more than 25 years** (Point 8, Recommendation No. 63 (1997) of the Standing Committee, adopted on 5 December 1997).

Furthermore, due to illegal earthworks, an artificial beach was created within the significant biotope of the Mediterranean Monk Seal (*Monachus monachus*) in Pegeia Sea Caves (Kafizis area), which is listed as a Terrestrial Zone of High Nature Protection in the Akamas Natura 2000 area (SCI CY4000010) Management Plan.

The Department of Forestry has conceived a Management Plan, covering the Akamas National Forest Park only. We consider this plan to be more of a **management of visitors rather than a conservation management plan** for the protection of the area. The plan consists of roads open to private cars, parking areas (for more than 650 vehicles), and infrastructure to house small souvenir shops and refreshment/snack shops.

All the above planned developments **do not take into consideration the 7th Protocol of the Barcelona Convention** on the Integrated Coastal Zone Management (ICZM) in the Mediterranean, since Cyprus has not signed and ratified it yet, though it is binding, and ignoring that the ICZM Protocol is already in force in the EU, since 2011.

## **B. Additional facts**

### **B.1 Akamas Peninsula (Natura 2000 site CY4000010 CHERSONISOS AKAMA)**

The Proposals for Management of the Natura 2000 sites (SCI CY4000010 and SPA CY4000023) in Akamas Peninsula went through a long process, including public consultation, and made provision for appropriate protection measures. However, the Natura 2000 Management Plans did not receive Ministerial approval in the form required by the national legislation for the protection and management of nature and wildlife, to become legal management instruments. Instead, the Ministry of Agriculture, Rural Development and Environment picked some of the proposals in the text and made them part of a new, separate proposal to the Council of Ministers for yet another set of decisions about Akamas.

It is evident through the Strategic Environmental Assessment (SEA) and the Appropriate Assessment decision for the proposed Akamas Local Plan, that the Local Plan was proposing for unsustainable developments within the Natura 2000 area and in other important areas for biodiversity. As we explain in *Appendix 1* even though most of these proposals are cancelled by the final environmental decision a lot of pressure is still applied from many directions from various local stakeholders to change the decision and allow unsustainable developments, even within the current Natura 2000 area.

Furthermore, because of an infringement procedure opened by the European Commission against the Republic of Cyprus, a grazing capacity management plan has been prepared for Akamas Natura 2000 area but not yet implemented.

Finally, as can clearly be seen in *Appendix 2*, the Republic of Cyprus did not designate the area, which was initially proposed as a Natura 2000 area, and as a result **the current Natura 2000 boundaries are insufficient**, as several important habitat types and species (some priority ones) remain unprotected. As a result, the European Commission opened an infringement procedure against the Republic of Cyprus, for the insufficient designation of the Akamas Natura 2000 site (SCI CY4000010) in May 2011, which closed in November 2018. However, in May 2018, the European Commission initiated a new **infringement procedure for the insufficient designation of the broader Natura 2000 Network in Cyprus**, including the habitats and species found in Akamas Peninsula and listed in the previous infringement procedure. Following the letter of formal notice sent in May 2018, the European Commission sent a reasoned opinion in October 2020, as Cyprus has not provided an exhaustive list of proposed SCIs and failed to provide all the necessary information on each site. As a result, the Natura 2000 network does not adequately cover the various habitat types and species that need protection.

Furthermore, in November 2019, the European Commission initiated another **infringement procedure regarding the bad implementation of the article 6, paragraph 3, of the Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (Habitats Directive)**. In detail, **the European Commission sent a letter of formal notice to Cyprus as it considers that it has generally and persistently, since the date of accession to the EU, failed to ensure that its authorities subject plans or projects to appropriate assessment of**

**their implications on the Natura 2000 sites and/or that it has agreed to plans or projects without having ascertained that they will not adversely affect the integrity of the Natura 2000 site concerned.** The infringement procedure includes several projects and plans, which are not directly connected with or necessary to the management of Natura 2000 sites in the Republic of Cyprus, but are likely to have a significant effect thereon, either individually or in combination with other plans or projects and have not been subject to Appropriate Assessment of their implications for the sites, in view of the site's conservation objectives. Many of these projects are situated within and/or adjacent to the Akamas Natura 2000 sites (SCI CY4000010 and SPA CY4000023), and include, inter alia, residential / tourist developments in the area of Sea Caves in Pegeia and quarries in the area of Androlikou Gorges.

Finally, the 2022 Government's response to the Recommendation states that the legal procedures for the Ministerial Decree for the Protection and Management of the area have commenced and are expected to be completed in the second trimester of 2022. At this point, we also note that, in June 2021, the European Commission initiated **another infringement procedure regarding the bad implementation of article 6, paragraph 1, of the Habitats Directive**, as **Cyprus has failed either to set any conservation objectives for SACs or to set appropriate conservation objectives that fulfil the requirements of the Habitats Directive (for example, those set already are too vague or do not identify properly the species and habitats they are supposed to target).**

## **B.2 Limni Area (Natura 2000 site CY4000001 PERIOCHI POLIS-GIALIA)**

In the Polis-Gialia area, a development project **was licenced** to create two golf courses (18 holes each) together with extensive residential, tourist and commercial infrastructure (including 792 villas, a hotel of two storeys and 160 rooms, two golf clubs with bars and restaurants, as well as road network). Although the original Appropriate Assessment decision ruled that an area of 475m from the shore remain free of housing and other buildings, this was later reduced to 280m and eventually scrapped altogether. The buffer zone between the shore and the proposed buildings is now as per the originally proposed development, varying between 150 to 280 meters (from the north-west to the north-east of the development project).

In April 2015, the Republic of Cyprus received a Reasoned Opinion from the European Commission because, without carrying out a proper assessment of the environmental impacts, it had authorized two golf courses with major residential and commercial infrastructure, within and adjacent to the Natura 2000 area established to protect the nesting ground of the *Caretta caretta*. The Government was asked to produce new Appropriate Assessment and Environmental Impact Assessment (EIA) studies. Despite strong evidence analysed and presented by Terra Cypria-the Cyprus Conservation Foundation, and the Federation of Environmental Organisations of Cyprus, regarding the unavoidable significant and negative impact to the sea turtle nesting beach in Limni area, the Government proceeded on 03.08.2018 to the licencing of the two golf courses and the 792 outlying villas.

In between the first and second EIA, the developer made no amendments to the design of his project to protect the sea turtle nesting beach, but instead added a two-storey, 160-room hotel structure, in addition to the 792 villas already in the original plans. This proposed hotel has been allowed to proceed together with the two golf courses, as well as the residential and commercial developments, apart from three rows of bungalows attached to the hotel which have been refused a permit. So now there is even more construction proposed on the shore than before!

A large part of the EIA study argument, prepared by private consultants, was based on very doubtful mitigation measures which are very likely impossible to implement. It is extremely important to note that in 2016 and before issuing the new Recommendation No. 191 (2016) [T-PVS/Files (2016) 26], the Bern Convention hired Dr. Paolo Casale, Co-Chair of the Marine Turtle Specialist Group, part of the Species Survival Commission of the International Union for Conservation of Nature (IUCN), as

an independent expert to conduct an on-the-spot appraisal and provide his expertise to the Convention [T-PVS/Files (2016) 44].

As Dr. Paolo Casale aptly notes: *“From the debate it seems that two different concepts were confused / misinterpreted: precautionary approach and mitigation measures. Mitigation measures are those measures that aim to reduce the impact of an anthropogenic threat where it is already present and has a negative impact on the population. In such a situation, reducing at a minimum the threat is the maximum feasible ambition of the mitigation measures, but eliminating completely the threat – i.e. restoring a pristine habitat condition – may be unrealistic. On the other hand, in a pristine situation – i.e. without a specific anthropogenic threat already in place – and in a context of scientific uncertainty about the effects of a potential threat – due to the complexity of factors involved – the precautionary approach would recommend to avoid developing a potential threat to such an important and delicate habitat like a sea turtle nesting site. The latter case describes the current situation at Limni”*.

It is our contention that acting against the evidence placed before it, the Government of Cyprus has allowed the golf project at Limni to go ahead without respect for the precautionary principle. Furthermore, there was no proper assessment of the cumulative effects that a project bringing hundreds of sun-seeking tourists or homeowners will have on the sea turtle nesting grounds. It should be noted that the beach of Limni is 430m long in total and the length of the sea turtle nesting beach is only 380m. Additionally, the beach at Limni is very narrow, no more than 20-30m wide, where humans and turtles will be competing for space.

Limni (and the 3 adjacent beaches) host the largest nesting population of *Caretta caretta* in the Republic of Cyprus (about 200 females’ nest there every other year so the population that depends on this area is at least 400 females). Limni beach itself has consistently had the highest nesting density of *Caretta caretta* in Cyprus and one of the highest in the Mediterranean. If this project is allowed to go ahead, it will not only be catastrophic for the *Caretta caretta* turtles that nest there, but it will also set a bad precedent for other proposed developments, making it very difficult for authorities to refuse development permits on private land in the adjacent area of Polis-Gialia and in Akamas Peninsula. This will have a negative and irreversible impact on the *Caretta caretta* population.

It is also extremely important to note that, amongst other things, Dr. Paolo Casale suggested 475m as a buffer zone with no buildings. Additionally, the European Commission itself suggested a 475m buffer zone in a letter sent to the Government on 18.1.2017. The Republic of Cyprus disregarded the recommendation. In response the EU Commission asked the Republic of Cyprus to provide more analytical data for the calculation of human disturbance to the nesting beaches and to use a lighting model that is designed for pristine areas rather than the one chosen (which was for areas already developed).

Regarding Point 13 of the Recommendation, we are underlying that the last Local Development Plan for Chrysochou Bay (including the area of Polis-Gialia), which was revised in August 2021, has not been subject to either a Strategic Environmental Assessment (SEA) or an Appropriate Assessment, in violation with the provisions of article 3, paragraph 2, of the Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive).

Finally, the 2022 Government’s response (September 2022) to the Recommendation states that the legal procedures for the Ministerial Decree for the Protection and Management of the area have commenced and are expected to be completed in the second trimester of 2022. Though we welcome an official timeframe for issuing the Ministerial Decree, this timeframe has not been achieved.

We also note that the Department of Public Works of the Ministry of Transport, Communication and Works has submitted studies in 2021 for the construction of 43 wave breaks across Chrysochou Bay, from the north-eastern part of the SAC Akamas Peninsula (CY4000010), near the locality Asprokremos – Chalavron, to Pomos and Pachyammos. At least 20 out of 43 proposed wave breaks are situated within the SAC Area Polis – Gialia (CY4000001).

These studies have not been assessed yet by the Department of Environment. However, the fact that the Department of Public Works officially submitted plans for the construction of wave breaks right in front of the major sea turtles nesting beaches demonstrates that without the necessary Ministerial Decrees for the Protection and Management of Natura 2000 sites, significant threats will continue to exist and even increase, due to the lack of enforcement of the appropriate conservation objectives and measures regarding the SAC Area Polis – Gialia (CY4000001).

### C. We request

That the Republic of Cyprus implement Recommendation No.191(2016) of the Standing Committee, adopted on 18 November 2016.

That the Republic of Cyprus signs and ratifies the 7th Protocol of the Barcelona Convention on the Integrated Coastal Zone Management (ICZM) in the Mediterranean.

#### *For Akamas:*

- **To expand the boundaries of the Natura 2000 site** in line with those proposed by LIFE project ‘*Special Areas of Conservation in Cyprus*’ (1998-2002). As the boundaries stand today, important habitat types and species remain unprotected.
- **To Declare the whole of the Akamas Peninsula a national park, a biosphere reserve or a protected area with comparable international protected status.** The Government’s plan to designate only the State Forest of the Akamas Peninsula as a National Forest Park (based on the existing national legislation), which covers only the 75% of the Natura2000 - Akama Peninsula, shows the lack of political will to implement the recommendations of the Convention. In addition, as the recommendations are not binding, the Government does not seem to take seriously the recommendations.
- **To establish and enforce an integrated Management Plan and legally binding Conservation Decrees** for the area, as well as directly allocate funding towards its implementation including concrete conservation measures, close monitoring, and patrol of the area.
- **To fully enforce the existing legislation for the protection of marine turtles** according to the Fisheries Law (Chapter 135) and Regulations 1990 (Reg. No. 273/90) in force since 1989.
- **To prohibit any future infrastructure for overnight and dining accommodation**, outside the existing boundaries of the designated Development Areas of Akamas villages. For this, **the Akamas Local Plan needs a complete revision.**

#### *For Limni:*

- **To reinstate the Department of Environment’s original decision to provide an area of at least 475m from the shore free of all development;** at the same time, to reduce the overall residential capacity of the project, since it is far beyond the long-term carrying capacity of the area’s ecosystem. This precaution is essential for the protection of the sea turtle nesting ground and to meet future erosion of the sandy beach.
- **To establish and enforce a Management Plan and Conservation Decree for the area**, in accordance with the procedure advocated in the National Law; also, to allocate funding towards its implementation and the careful monitoring and patrolling of the area.
- **To enforce the existing legislation for the protection of marine turtles** according to the Fisheries Law (Chapter 135) and Regulations 1990 (Reg. No. 273/90) in force since 1989.

Annexes:

- [Terra Cypria comments on the Recommendation](#)
- [Map of Akamas Peninsula and Polis-Gialia Natura 2000 sites](#)
- [Photos](#)
- [Habitats and species insufficiently protected by the Cyprus Government proposal](#)





Το Κυπριακό Ίδρυμα Προστασίας του Περιβάλλοντος  
Kibris Koruma Vakfi  
The Cyprus Conservation Foundation

Working for a sustainable Cyprus

05 August 2022

## **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 in definitely 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 is expected to be published soon (Local Plan for the Akamas' Communities), and the other is under preparation (Pegeia Local Plan). The Local Plan for the Akamas' Communities will outline, 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 several developments are still being discussed through the Local Plan for the Akamas' Communities which is in its final steps of publishing.

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.

A positive point is the signing of a Memorandum of Understanding (MoU) between the Department of Fisheries and Marine Research (DFMR) and our foundation. Under this MoU, Terra Cypria will 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 will be approved and monitored by the DFMR and special protocols will be 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.

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. This year, as far as we know rangers hired by the DFMR, will be patrolling the nesting beaches of Lara- Toxeftra and Polis-Gialia and will be authorized to issue fines on the spot and hopefully this will 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 and Toxeftra sea 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, recent 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).

The Proposed Local Plan for the Akamas' Communities, which is currently under Environmental Assessment, foresees several developments outside the local communities' boundaries which are spread across the Peninsula and are threatening the unique environment of the Peninsula and the Natura 2000. Some of them are:

- Visitable farmstead within and adjacent to the Nature 2000 areas (include accommodation and overnight infrastructure, retail and catering facilities, dining facilities, information facilities, sports facilities).
- Specialized Developments including:
  - higher education institutions (Universities, Colleges and other specialized schools),
  - Specialized Medical Centers, large Diagnostic Centers, Medical Centers of International Standards and Private Hospitals.
  - Recreation Centers, Organized Large Scale Sports Centers.
  - Theme Parks.
  - Research and Development Centers and High Technology Developments.
- Agricultural Warehouses. The concerns are that these warehouses, is well known through several examples, are eventually converted into houses without any planning permission.
- Isolated houses located within 500m from the outer boundary of designated residential areas
- Expansion of and creation of new residential and tourist Zones while the degree of saturation of the existing zones is 17% for residential and 19% for tourist Zones.
- A new tourist Zone in the Community of Ineia outside the development boundaries
- A new quarry zone within and adjacent to Natura 2000 area

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».*

Despite the condition in the revised AA (July 2022) to minimise the boundaries of the new quarry, we believe this cannot be considered satisfactory for the protection of priority species. In

addition, 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.

### ***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.