



Strasbourg, 7 September 2026

T-PVS/Files(2026)2017-02_comp

CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

46th meeting,
7-11 December 2026,
Strasbourg

3rd Bureau of the Standing Committee

22-24 September 2026,
Strasbourg

Open File: 2017/02

**Negative impacts to Lake Ohrid and Galichica National Park
candidate Emerald Sites due to infrastructures developments
(North Macedonia)**

- REPORT BY THE COMPLAINANT -

*Document prepared by
Front 21/42*

Skopje, 31.08.2026

Bern Convention on the Conservation of European Wildlife and Natural Habitats

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

UPDATE REPORT (brief overview)
Implementation of Recommendation 221 (2023)
(01.01.2026 – 31.07.2025)

Summary: In the period 1 January 2026 – 31 July 2026 no steps were taken towards implementation of any of the 15 points of Recommendation 221 (2023).

UPDATE FOR EACH POINT OF RECOMMENDATION 221 (2023)

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.*** There were no steps towards implementation of this point. New draft Law on Nature protection published for public consultations in May 2026 – there are no provisions to implement this recommendation.
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.*** There were no steps towards implementation of this point. The situation with the management of the World Heritage Site continues to be even contrary to the national Law on Managing WH Ohrid Region: the WH Management Commission (established in April 2024) lacks the mandatory representatives of the environmental NGO sector and biodiversity experts from the academia; the Commission's sessions are not open to the public. There's no public information about any sessions of this body.
3. ***Conduct an expert evaluation with a public consultation procedure of both the Management Plan for the Natural and Cultural Heritage of the Ohrid Region 2020-2029 and the Strategic Recovery Plan for Revitalization of Ohrid Region natural/cultural values to identify actual and potential weaknesses in their design and implementation, using the information gathered to upgrade each document.*** - There were no steps towards implementation of this point.
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.***

There were no steps towards implementation of any part of this point.

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

There were no steps towards implementation of this point

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

There were no steps towards implementation of this point - on the contrary, legalization of illegal constructions continued, as well as the emergence of new illegal constructions. According to the Official Journals of the Municipality of Ohrid, in the period January – July 2026 the municipality legalized 49 illegal constructions. According to the report published by the State Audit Office in January 2026, there are 456 legally binding decisions for removal of illegal constructions and none has been executed.

- 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.***
- There were no steps towards implementation of this point. The process for this law remains dormant after the withdrawal of the proposed law (in September 2024), which was contrary to Recommendation 221 (2023).
- 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.***- There were no

steps towards implementation of this point since the withdrawal of the draft law in September 2024.

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.*** - There were no steps towards implementation of this point.

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.*** - There was no development in regard to this point.

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.***

The new draft Law on Nature Protection doesn't even mention the Emerald Network – there are articles about Natura 2000 and national Ecological Network, but Emerald is officially ignored. Our position is that this approach creates a false picture of aligning the national legal nature protection with the one of the EU, while avoiding direct involvement of and accountability to an independent international authority, such as the Bern Convention.

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.***

There was no development in regard to this point. Information presented for points 7 and 8 is applicable here as well.

The July 2026 Report by the State Institute of Public Health (again) confirmed the St. Naum Hotel and Ostrovo restaurant as direct polluters of Lake Ohrid.

13. ***Ensure that provisions allowing for construction and agriculture in the Studenchtishte Marsh are removed from the final version of the Law on Proclamation of Studenchtishte 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.*** - There was no development in regard to this point. Information presented for points 7 and 8 is applicable here as well.

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.*** - There was no development in regard to this point.

- 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.** - There was no development in regard to this point.

Additional information: The WH Centre and the advisory bodies (IUCN and ICOMOS) yet again requested inscription of WH Ohrid Region on the List of WH in danger. However, the WH Committee decided (for a fourth time since 2019) to ignore the experts' recommendation and this time gave the State Parties of North Macedonia and Albania even longer period to implement UNESCO's decisions and recommendations. Thanks to the latest WH Committee Decision, the state parties will have until 2030 to address the problems.

All previous additional years that were given for implementation of UNESCO recommendations were actually used for legalization of illegal constructions, emergence of new illegal constructions (with a quiet approval by the authorities), further destruction of the shore, urbanization of Studenchishte Marsh and the National Park Galichica, etc.

Proposed draft decision by the WH Centre and the Advisory bodies:
<https://whc.unesco.org/document/226808>

Adopted decision by the WH Committee: <https://whc.unesco.org/document/226969>

Respectfully,
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