

# Lake Ohrid: Post-Reactive Monitoring, Progress and Stagnation

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Lake Ohrid, straddling the border of Macedonia and Albania, is thought to be the most species-rich inland water on Earth by surface area<sup>1</sup>. As one of the oldest lakes on the planet, Ohrid has existed for enough time both to safeguard relict species from the tertiary period and evolve entirely new ones of its own<sup>2</sup>. To the east is Lake Prespa which is connected to Lake Ohrid via numerous underground channels emerging at the latter in highly unusual coastal and sublacustrine springs, supplying over 50% of its water<sup>3</sup>. Named Mount Galichica, this karstic massif is itself a 5000-species national park, Key Biodiversity Area, Important Plant Area and Prime Butterfly Area.

Unsurprisingly, these extensive natural resources also exhibit some of the oldest human settlements in all Europe. With uninterrupted development stretching back to prehistoric times, there are 244 archaeological sites most notably in the city of Ohrid's urban core<sup>4</sup>. In accord with their exceptional natural value, Lake Ohrid and 72% of National Park Galichica achieved designation as a UNESCO World Heritage Site in 1979 under Criterion (vii). One year later, the area's cultural values were also inscribed on the World Heritage List under Criteria (i), (iii) and (iv), which now manifests an 83,350 ha mixed property under the title Natural and Cultural Heritage of the Ohrid Region<sup>2</sup>. Alongside the World Heritage Site, in 2014, Lake Prespa was designated with Lake Ohrid and Mount Galichica as the UNESCO Ohrid-Prespa Transboundary Biosphere Reserve.

## Threats

Recent years have witnessed steady deterioration of Ohrid region World Heritage. Uncontrolled urbanization, both legal and illegal, has combined with overfishing, a failing sewerage system, wetland degradation, eutrophication, mismanagement of hydroelectric dams, non-native species, pollution, wildfires



Fig. 1: Map of Lake Ohrid. Map:

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and inadequate solid waste disposal to push Lake Ohrid towards a biodiversity crisis<sup>5</sup>. Emerging from a context of institutional incapacity, poverty, unemployment, a lack budgetary resources, poorly coordinated strategic and legal frameworks, politicization, intransparency, and low decision-maker aware-

1 Albrecht, C. & Wilke, T. (2008) Ancient Lake Ohrid: biodiversity and evolution, *Hydrobiologia* 615: 103-240.

2 UNESCO World Heritage List, Natural and Cultural Heritage of the Ohrid region (available 9/3/2018)

3 Lorenschat et al (2014) Recent anthropogenic impact in ancient Lake Ohrid (Macedonia/Albania): a palaeolimnological approach, *J Paleolimnology*, 52:139.

4 Natural and Cultural Heritage of the Ohrid Region World Heritage Site Management Plan: 188-194.

5 Kostoski, G. et al (2010) A freshwater biodiversity hotspot under pressure – assessing threats and identifying conservation needs for ancient Lake Ohrid, *Biogeosciences*, 7, 3999–4015.

ness<sup>67</sup>, these threats reached unprecedented heights in plans for a series of mega-projects aimed predominantly at the tourism industry, which sought to drain and concrete Studenchishte Marsh, the last of Lake Ohrid's shoreline wetlands, construct a full-scale ski-resort in National Park Galichica, and expand transport infrastructure via two roads (A3 express and A2 highway), a railway and even a sports airport.

Consequently, in April 2017, a Joint Reactive Monitoring Mission from IUCN, ICOMOS and the World Heritage Centre took place to ascertain whether the property should be placed on the List of World Heritage in Danger. With a progress report requested for February 1 2018, it provided 19 recommendations to avoid this fate<sup>8</sup>, including cancellation of the ski-resort and abandonment of two proposed A3 express road sections. These recommendations were further underlined by the World Heritage Committee in Krakow 2017, which requested complete compliance<sup>9</sup>. The following is a summary of the current situation.

### Progress Report: Joy, Hope and Stagnation

The Macedonian government belatedly adopted the aforementioned progress report at its 54<sup>th</sup> session on 13 February 2018. Two days later, the report was submitted to the World Heritage Committee, being available to the Macedonian people in the Macedonian language only on February 23 after pressure from Ohrid SOS, a local environmental citizens' initiative.

Contents reveal general, though incomplete, alignment with the Reactive Monitoring Mission's requests. Most positively, the A3 express road has been cancelled and a proposal to reduce the level of protection in certain areas of National Park Galichica, which would have facilitated the ski-resort project, has been quashed<sup>10</sup>. This was confirmed by the 57<sup>th</sup> Session of the Macedonian government in March 2018, which halted a process to change the management plan for the national park.

On the other hand, the railway route Kicevo–Radozhda–Lin (Albania), part of pan-European Corridor 8, will most likely not be amended despite World Heritage Committee advice to analyse other routes<sup>10</sup>. In regard to the A2 highway (Trebenishte–Struga–Albanian border), the government has undertaken responsibility for planning passage routes for animals and people but does not provide a direct response to the committee's advice to refrain from building a new dual-carriageway Struga–Albanian border and upgrade the existing road to expressway standard instead<sup>11</sup>.

The exact route for this section is yet unknown. Surprisingly, the State Party seems to have completely neglected the request for an assessment of the cumulative impact of the railway and the A2 highway with regard to OUV<sup>9</sup>. In consequence, the potential negative effects of the two projects on Lake Ohrid's north-west shore needs close examination and monitoring.

Some recommendations are delayed and others are just at the beginning stage. One example is SEA which currently awaits revision of the Ohrid Region Management Plan. It should be com-

6 European Commission (2016) Former Yugoslav Republic of Macedonia 2016 Report

7 Ministry of Environment and Physical Planning (2014) Fifth National Report to the Convention on Biological Diversity.

8 Report of the Joint World Heritage Centre/ICOMOS/IUCN Reactive Monitoring Mission Report to the World Natural and Cultural Heritage of the Ohrid Region (2017).

9 World Heritage Committee Decision 41 COM 7B.34

10 Progress Report on the Implementation of the Recommendations of the Decision 41 COM 7B.34 on the Status of the Natural and Cultural Heritage of the Ohrid Region (2018)

11 IUCN (2017) World Heritage Outlook, Natural and Cultural Heritage of the Ohrid Region



Fig. 2: Aerial view of the plot of the new hotel before and after construction.

Photo: SOS Ohrid



pleted by October 2018<sup>11</sup>. Another important unresolved issue is the UNESCO mission recommendation for the “exploration of an idea to re-divert Sateska back into the Crn Drim River.”<sup>9</sup> Currently, the river flows directly into Lake Ohrid and represents the biggest source of eutrophication-causing phosphates, yet there are few indications of State Party intentions to resolve the issue with the urgency required<sup>11</sup>.

Of further concern is the complete omission of any reference to the Reactive Monitoring Mission’s Recommendation to “put in place a moratorium on any coastal and urban transformation within the World Heritage property, at least until all relevant planning documents (....), and effective control mechanisms are established”<sup>9</sup>. This oversight displays ignorance of IUCN’s conclusion that legal and illegal constructions are one of the main current threats to the property’s integrity, especially in combination with the failing wastewater and solid waste systems<sup>11</sup>.

The 2018 Progress Report merely outlines the procedure by which illegal buildings can be legalized<sup>11</sup>. As such, it either wilfully sidesteps the need to strengthen the effectiveness of the legal system or demonstrates a dangerous lack of awareness of its failures, despite IUCN stating that enforcement of law is “weak”<sup>12</sup> and the Joint Reactive Monitoring Mission emphasizing that an overhaul is necessary<sup>9</sup>. Such misgivings are underlined by the State Party’s one-year extension to the deadline for making illegal buildings lawful<sup>1</sup> and its lack of action to reconsider amendments to the Law on Management of Illegal Buildings (Official Gazette of RM No. 124/15), which were enacted by the previous government in 2015 to enable the legalization of objects constructed within the strictly protected coastal zone of natural and artificial lakes and rivers without the need for an opinion from the Ministry of Environment and Spatial Planning. (Incidentally, the present ruling party opposed these amendments when in opposition<sup>13</sup>, yet has not sought to reverse them now it is in office.)

## Lagadin

The danger posed by uncontrolled and illegal building on the sensitive Lake Ohrid shore is aptly demonstrated by the current situation in the village of Lagadin. Based on the new General Act for Villages without Urban Plan, a permit for construction of a 5-storey hotel within the strictly protected 50-meter green belt of the lake shore was issued in 2016<sup>14</sup>.

Construction started in December 2016, but was halted by the State Inspectorate for Construction and Urbanization after Ohrid SOS notified that the hotel was in conflict with 12 laws



Fig. 3: Civil Society protest in front of the new hotel construction in Lagadin.

Photo: SOS Ohrid

and 1 bylaw. The investor then resumed construction activities without a valid permit several times in 2017 and briefly in February 2018, enabling the building to advance significantly. Of note, the hotel project is linked to TUI Netherlands, a Dutch tour operator which has confirmed an arrangement to supply customers once the building is complete<sup>15</sup>. Despite having been informed of the situation with the hotel and the Joint Reactive Monitoring Mission Report, TUI has been unresponsive to communication on the topic.

## Commission for Management of the Natural and Cultural Heritage of the Ohrid Region

A Commission for Management of the Natural and Cultural Heritage of the Ohrid Region was finally established on February 1 2018. Unfortunately, serious shortcomings are evident in

- (1) the composition of the commission;
- (2) the constitution process; and
- (3) the selection of civil sector representatives.

Namely, the commission seems to contain individuals either linked to the decision-makers that supported proposals for mega-projects that would have threatened the Ohrid region’s OUV or who expressed little opposition to these projects. Considering that the committee’s purpose is to “control development pressures and interventions at the property”, these shortcomings are highly relevant. With no transparency, the public and other interested parties received no information about the election and constitution until the day the commission was

12 25<sup>th</sup> Session of the Government of the Republic of Macedonia 29/8/2017.

13 SDSM statement reported by Telma 27/8/2015.

14 Prof. Miroslav Grcev, Expertise on General Act for Lagadin Village. (Grcev is a Head of the Department of Urbanization at the Faculty of Architecture, Uni St. Cyril & Methodius, Skopje.)

15 Letter addressed to Ohrid SOS dated/received 2017/2/10 from Mr P. A. Rijnfeld, Attorney-at-Law for TUI.



Fig. 4: View of the Studenchishte Marsh.

Photo: K. Amaudov

## Studenchishte Marsh

Moves to establish Studenchishte Marsh, the last remaining shoreline wetland, as a Monument of Nature under national law and include it within a Lake Ohrid Ramsar site have stalled. Ohrid Municipality is holding out for another valorization of the wetland to be conducted before moving forward with protection, even though a 2012 report by an expert team has already recommended that 63.97 hectares should receive Monument of Nature designation<sup>16</sup> and existing data is more than sufficient to trigger several Ramsar criteria for Lake Ohrid. This both delays the nomination process and raises fears that ways to avoid protection

of the full wetland area are being sought as in other Macedonian ecological management that are still awaiting protected status after 15 years or longer<sup>8</sup>.

established. Members of the civil sector were selected by recommendation instead of open application, all of which is undemocratic, in violation of rights to equal participation and the continuation of an underlying culture of unaccountability from which substandard management of the World Heritage Site emerges.

## Conclusions

1. Clear positive steps have been made with cancellation of the A3 express road and ski-resort. However, significant threats remain.
2. Studenchishte Marsh, a vital wetland habitat and natural filter for Lake Ohrid, still has not secured an appropriate level of protection despite the IUCN's identification of wetland revitalization as a key site need<sup>12</sup>.
3. Ohrid Municipality continues to display inability and unwillingness to deal with illegal construction. Strong business interests, corruption and the same cadre of individuals holding positions almost for life inhibit meaningful change. An overhaul of power structures and the legal framework is therefore required. In the meantime, Reactive Monitoring Mission Recommendation 6 for a moratorium on construction should be implemented immediately.
4. A deficit in understanding of environmental issues and the importance of ecosystem services, particularly their functions for the tourism industry, is evident among both decision-makers and the business community. Greater awareness must be secured to prevent future ill-conceived plans for the Ohrid-Prespa region.
5. The information flow to and fair involvement of civil society still requires an upgrade, even though some progress has been made.



Proposed zoning of Studenchishte Marsh according to the Integrated study  
 Light green – Zone of active management  
 Darker green – Zone of sustainable use  
 Darkest green – Zone of strict protection

Fig. 5: Proposed zoning of the Studenchishte Marsh.

Map: SOS Ohrid

16 Spirovska, M. et al (2012) Integrated Study on the State of the Remains of Studenchishte Marsh and Measures for its Revitalization, Dekons-Ema Environmental Management Associates, Skopje, Macedonia.