

To: Mechtild Rössler

**The Director of the UNESCO World Heritage
Centre**

Dear Ms. Rössler,

Greenpeace Russia, Environmental Watch on North Caucasus and NABU-Caucasus urgently draw your attention to the Draft Decision WHC/17/41.COM/7B.Add and express a great concern that the following information on the WHS Western Caucasus (Russian Federation) (N 900) status is omitted in the document:

- Plans for recreational use and development in Mt. Fisht areas were not abandoned (neglecting Recommendation **32 COM 7B.25, 36 COM 7B.23**);
- Biosphere Centre built at Lunnaya Polyana is used as a recreational facility while it was declared to serve for management, research and monitoring, or visitor information purposes only (neglecting Recommendation **32 COM 7B.25**);
- New recreational facilities in Mt. Fisht and Lunnaya Polyana are under construction (neglecting Recommendation **32 COM 7B.25**);
- Legal status of Northern buffer zone of the Caucasus Strict Nature Reserve, which is part of the property, is not determined and its' protection is not reinstated (neglecting Recommendation **32 COM 7B.25, 34 COM 7B.24, 35 COM 7B.24**);
- The legal protection status in the upper Mzimta Valley within the property boundaries was not raised, construction of buildings and facilities in this area was not halted (neglecting Recommendation **36 COM 7B.23**);
- WHS Buffer Zone is not fully determined, construction and logging operations continue to deteriorate the Outstanding Universal Value (OUV) of the property (neglecting Recommendation **32 COM 7B.25, 33 COM 7B.29, 34 COM 7B.24, 37 COM 7B.23**).

We also draw your attention to the Decision №586-p (30.03.2017) of the Government of the Russian Federation to lease several land plots on the boundary of the property for the period of 49 years to the Roza Khutor Ski Resort with a purpose of further development of recreational facilities. Transport infrastructure construction has been started already. Hence, the status of the development in the area should be considered as ongoing rather than a potential one (p.7 of the Draft Decision **41 COM 7B.8**).

Therefore, we strongly urge the Committee to amend the Draft Decision WHC/17/41.COM/7B.Add as follows:

Add the following paragraph:

“Requests the State Party to invite a joint World Heritage Centre/IUCN Reactive Monitoring mission to the property to evaluate current and potential impacts of ongoing and planned development of large-scale skiing facilities on the OUV of the property and to assess whether the property meets the criteria for inscription on the List of World Heritage in Danger”;

Amend paragraph 8 so it would read:

“Further requests the State Party to submit to the World Heritage Centre, by 1 February 2018, an updated report on the state of conservation of the property and the implementation of the above, for examination by the World Heritage Committee at its 42nd session in 2018 with a view to considering in case of confirmation of ascertained or potential danger to Outstanding Universal Value, the possible inscription of the property on the List of World Heritage in Danger”.

Greenpeace Russia Nature protected areas coordinator




Coordinator of the Environmental Watch
on North Caucasus.



_____ Rudomakha A.V.

Director NNC «NABU-Caucasus»



_____ Gubchenko E.V.