

March 7, 2013

To:
The President of the the Republic of Bulgaria
1123 Sofia
2 Dondukov Blvd
Bulgaria

Re: Amendments to the Management plan of the Pirin National Park

Your Excellency,

as leading European nature conservation organisations and networks, we are highly concerned about the amendments to the Management plan of the Pirin National Park (http://www3.moew.government.bg/files/file/Nature/Protected_areas/Bansko.pdf) that were approved in February 2013 by the Supreme Expert Environmental Council at the Ministry of Environment and Waters and are to be adopted by the Bulgarian government. We are convinced that more sustainable eco- and educational tourism employment could be accommodated if this is well planned and the park is in good conservation status. The planned amendments however will jeopardise this potential and threaten both the park's landscape and ecosystems.

These amendments contradict public interest, breach EU and Bulgarian environmental law and ignore internationally recognised concepts for the management of protected areas – it is unacceptable that the Bulgarian government supports them.

We urge you to stop the amendments adoption procedure and guarantee that any amendment to the Management Plan of the Protected Area is subject to the environmental assessment and thorough public consultation required by Bulgarian and EU law.

Our view is that the amendments are specifically aimed at allowing the construction of new ski-lifts and slopes in a park already significantly damaged by ski facility development between 2001 and 2007. The amendments have not been subject to the environmental assessments under the SEA Directive and the Habitats Directive that Bulgarian and EU law require, and are therefore illegal. Additionally, if adopted, they will hamper the development of sustainable tourism in the region as they contravene the key provisions in the Strategy for Sustainable Tourism prepared in 2011 with the financial support of UNESCO (<http://pirin.bg/hcss/pdf/strategia.pdf>).

We consider the adoption of the amendments a dangerous precedent which will inevitably ease the restrictions on economic activities in other protected areas in Bulgaria and weaken the Protected Areas Act.

Bulgaria is home to many of Europe's outstanding natural treasures – of which Pirin National Park is one, as its status as UNESCO World Heritage site and as Natura 2000 site reflects. It is the responsibility of the Bulgarian government to preserve these treasures for present and future generations.

Sincerely,

Friedrich Wulf

International Biodiversity Campaigner

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On behalf of:

