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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE
AND NATURAL HABITATS

Standing Committee

32nd meeting
Strasbourg, 27-30 November 2012

Other complaints

**SKI TOURISM DEVELOPMENTS IN STARA PLANINA
CANDIDATE EMERALD SITE IN SERBIA**

REPORT BY THE NGOS

*Document prepared by
11 NGOs*

Council of Europe

Directorate of Culture, Natural Heritage and diversity,
Biological Diversity Unit — IVANA D’ALESSANDRO

European Commission

Commission for Enlargement and Neighbourhood Policy — MR. ŠTEFAN FÜLE
Commission for the Environment — MR. JANEZ POTOČNIK

27.06.2012.

Respectfully Madams / Sirs

On behalf of 11 non-governmental organizations we want to inform you about direct violations of the Convention on the Conservation of European Wildlife and Natural Habitats in Serbia due to ski tourism development within Nature Park “Stara Planina”.

As the first large infrastructural objects have been built (hotel and ski lifts) and five more hotels are planned in a very short period, we hope for quick response/reaction from The Standing Committee.

Non-governmental organizations:

Biology and ecology student study and research society „Josif Pančić“

*Ecological research society „Mladen Karaman“ Academic natural society of Kraljevo
„Balkan“*

Biological society „Dr Sava Petrović“

NGO HabiProt

Bird protection and study society of Serbia

Mountaineering society „Srebrna glava“

Society for biological research “Sergej D. Matvejev”

League for Ornithological Action of Serbia

NGO Protego

Association for the Protection of Zvezdara Forest, Belgrade

INTRODUCTION

Stara Planina Mt. was proclaimed **Nature Park** in 1997 (Official Gazette of Republic of Serbia: No. 19/97), and is listed as one of the most valuable **Emerald** sites in Serbia. Additionally, it is listed among **IBA** (International Bird Areas), **IPA** (International Plant Areas), **PBA** (Prime Butterfly Areas), IUCN Green Belt, Pro Geo and is planned to be included in the UNESCO Man and Biosphere program.

At the same time, this area has been chosen as a priority site for ski tourism development, although highest peak reaches only 2169 m a.s.l. The planned ski infrastructure covers most of the territory of Stara Planina Mt. disregarding its natural values and Emerald status (see Map 1). Besides ski infrastructure, mini hydro-power plants and wind turbines are planned to be built in this region.

The first construction activities in the Natural Park that started in 2006 were illegal, lacking Environmental Impact Assessment and permission from the Serbian Institute for Nature Protection and Serbian Forestry Agency, as required by law. At this time, association of 61 NGOs tried to stop these activities, but their opinion was completely ignored. The website www.staraplanina.rs¹ and electronic petition <http://www.thepetitionsite.com/1/save-staraplanina-petition> were started by these NGOs. After that, in 2008, the director of Institute for Nature Conservation (Dr Lidija Amidžić) was replaced and all the further activities were partially legalized, turning NP Stara Planina into one of the largest construction sites in Eastern Serbia.

In 2010, a new Law on Nature Protection (Official Gazette of Republic of Serbia, No. 88/2010) was adopted. Article 35 of the law was completely changed, allowing certain infrastructure to be built in zone II and III of protected areas. In 2012, another act was adopted (Official Gazette of Republic of Serbia, No. 31/2012) allowing even more infrastructure to be built in these zones. As less than 10% of protected areas belong to zone I, this will legalize many activities in protected areas and may lead to great destruction of nature.

VIOLATION OF THE CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE AND NATURAL HABITATS

Violation of Articles 4.1; 5; 6

Legislative and administration measures in Nature Park Stara Planina Mt. are in contradiction with nature conservation.

Protection zone I at locality Babin zub does not have buffer zone and some surrounding areas were proclaimed zone III, allowing high-scale development of ski infrastructure.

Violation of Articles 3.2; 4.2

The Act on Protection of NP Stara Planina, The Master Plan and The Spatial Plan of Stara Planina Mt. are in contradiction with nature protection.

Act on Protection of Nature Park Stara Planina (Official Gazette RS, 23/2009) is allowing ski tourism development in protection zones II and III, which was contrary to the Law on Nature Protection of Serbia at the time the act was adopted.

Master Plan by Horwath Consulting agency for Stara Planina Mt. development proposes building of completely new tourist villages at localities Jabučko ravnište and Babin zub. These localities are high mountain pastures, forests and rocky habitats in protection zones I and II according to Serbian legislature, and will be completely destroyed if this Master Plan is realized. Altogether, 32 ski lifts are planned in the final stage and in the first stage 6,192 tourist beds are planned at Jabučko ravnište alone. See Map 2 for complete picture of planned ski lifts and ski tracks at this site.

¹ Note: The site is currently off-line due to financial reasons, and the new website is started on <http://savestraplanina.blogspot.com>. As a result of this, most of informations are missing on a new website.

Spatial Plan for Stara Planina Mt. development is in even greater contradiction with nature protection. The whole region of the mountain is planned for tourism development, including ski slopes, ski lifts, hotels and tracks **over the entire mountain chain** (see Map 1)!

No exceptions from the Article 9.1 could be allowed in this case

The Master plan for developing Stara Planina Mt. envisages building of new infrastructure in areas such as mountain peat bogs, grazing pastures, mountain meadows and forests, disregarding the wellbeing and traditional way of living of local people.

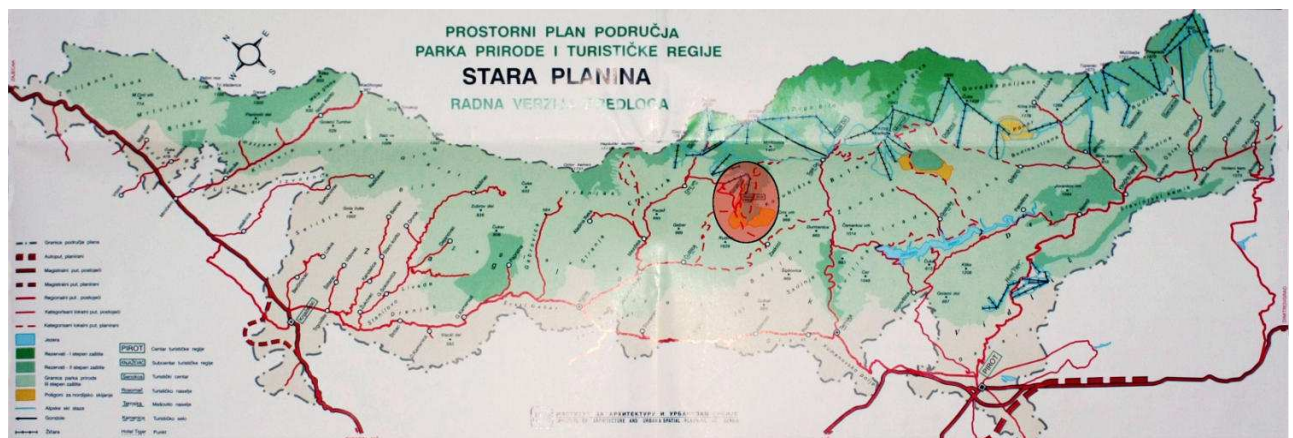
Additionally, for large hotels, new villages at the hilltop and devices for making artificial snow all clean drinking water is planned to be taken from virtually all local rivers and streams, which would be very serious threat to crops, livestock, forests and public health.

Recommendations No. 25 (1991) of the Standing Committee on the conservation of natural areas outside protected areas proper

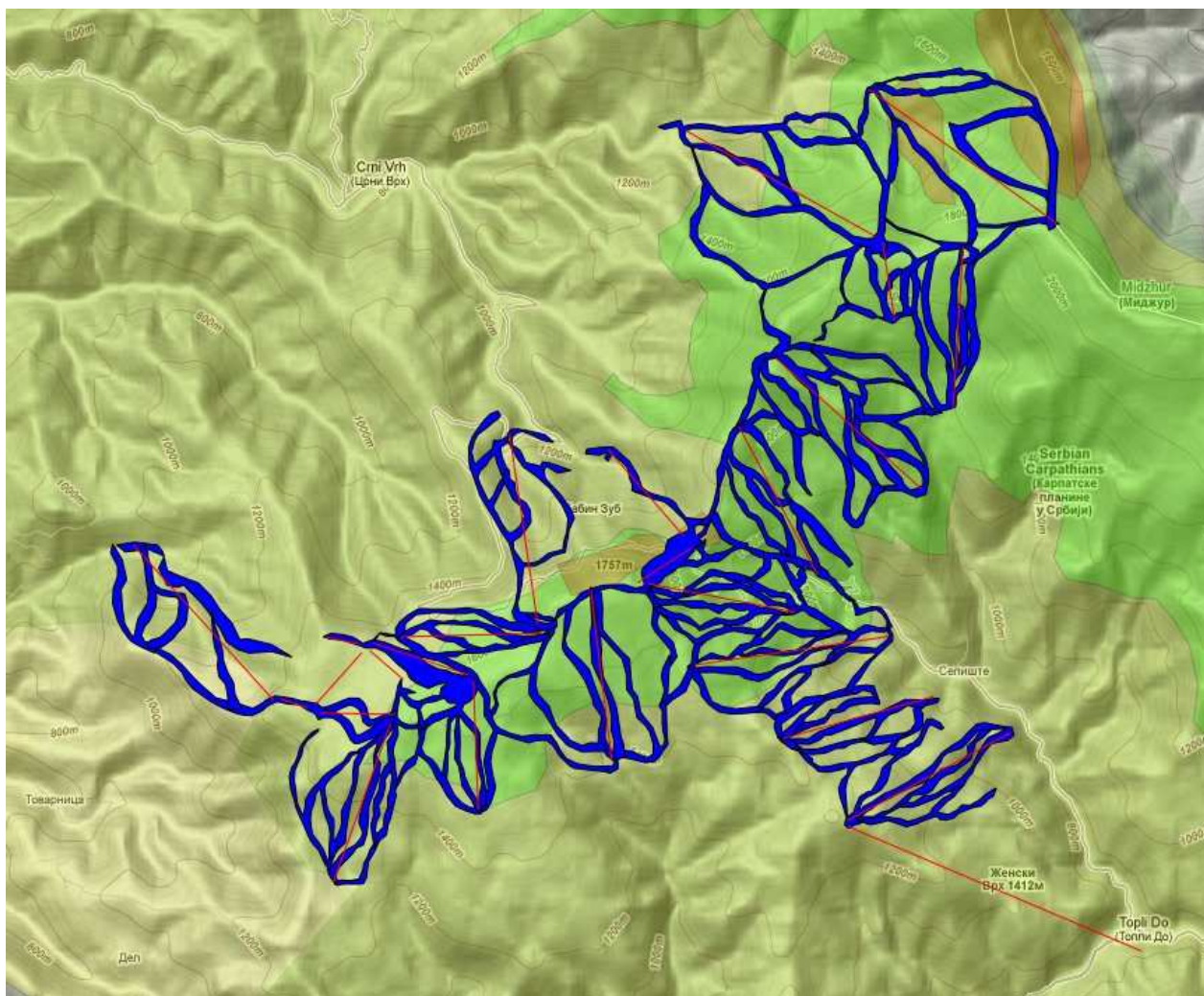
The Ecological Network principle has been completely disregarded by each and every Serbian institution.

It is recommended by the Convention on the Conservation of European Wildlife and Natural Habitats (T-PSV/PA (2011) 7; Appendix 6) to encourage the conservation and where necessary, restoration of ecological corridors. The Master Plan and the Spatial Plan of Stara Planina Mt. region are making huge obstacles to development of such network. For ski tourism purposes new high-voltage lines, roads, ski lifts and ski tracks have been already developed not only outside protected area, but cutting through protected area itself. The new roads are used for both legal and illegal logging, and even more of similar infrastructure is planned. The watercourses are planned to be completely changed and plans include transferring water from Zavojsko lake to ski center in Jabučko ravnište (about 11 km in straight line, through mountain terrain). Many water springs are planned to be used for drinking water and artificial snow, draining not only rivers but also extremely valuable high mountain peat meadows that are supposed to be protected under Ramsar Convention. In the southern part of Stara Planina, the municipality of Pirot has developed a report on hydro-energetic potentials. The report was compiled by engineers only, disregarding biodiversity expertise, thus the report is in contradiction to the basic principles of nature protection. A total of 37 mini hydro-power-plants was proposed to be developed on the rivers in Pirot region alone affecting some of the strictly protected species.

The measures proposed for sensitive mountain areas (Paragraph VI.2) were ignored and measures proposed by the involved parties are completely opposite to them.



Map 1: Spatial plan for protected region of Stara Planina Mt. Babin zub – Jabučko ravnište region is marked in red (see Map 2 for larger map of this region). Ski infrastructure is marked by thin black lines, covering the most valuable regions of Nature Park.



Map 2: Google Earth map of the Babin zub – Jabučko ravnište region with protection zones marked in yellow (zone III), green (zone II) and red (zone I). Planned ski lifts are represented by red lines. Planned ski tracks are marked by blue polygons.

STRICTLY PROTECTED SPECIES IN THE REGION OF JABUČKO RAVNIŠTE AND BABIN ZUB, DIRECTLY ENDANGERED BY CURRENT CONSTRUCTION ACTIVITIES

The strictly protected species are species of plants and animals listed under the Convention on the Conservation of European Wildlife and Natural Habitats, Resolution No. 5 (1998) of the Standing Committee concerning the rules for the Network of areas of special conservation interest (Emerald Network) (T-PSV/PA (2011) 7; Appendix 10).

Note: Due to lack of data and experts the groups of CRUSTACEA, ARACHNIDA and Molluscs are not included in the list

PLANTS

Lilium jankae

VERTEBRATES

Mammals

Canis lupus
Ursus arctos
Lynx lynx

Birds

Accipiter gentilis

Accipiter nisus
Aquila chrysaetos
Circus gallicus
Pernis apivorus
Falco peregrinus
Bonasa bonasia
Alectoris graeca saxatilis
Crex crex
Charadrius morinellus
Caprimulgus europaeus
Dendrocopos leucotos
Dryocopus martius
Lullula arborea
Ficedula albicollis

Amphibians

Bombina variegata

INVERTEBRATES

Insects

Mormonotermes funereus

Our field surveys have proven existence of *Ursus arctos* and *Lynx lynx* populations in the region of Stara Planina Mt. These animals were driven to the brink of extinction in the past decades, and survival of the populations is probably due to migration from Bulgarian part of Stara Planina Mt. The populations of *Spermophilus citellus* are critically endangered due to lack of grazing in the highland areas, while only the populations of *Canis lupus* could be marked as stable.

To preserve these species urgent measures are required. Large scale tourism plans must be abandoned and funding should be arranged to support traditional grazing in highland pastures, enabling long term survival of both local people and biodiversity.

Construction works already damaged habitats of several strictly protected species. For example, some populations of *Lilium jankae* have already been destroyed at Jabučko ravnište and Babin zub, while remaining ones will be lost if ski resort project development continues. The pristine beech forests at Babin zub (see Photo 4), potentially valuable for large mammals and White-backed Woodpecker (*Dendrocopos leucotos*) were severely damaged and interspersed by ski tracks and new roads. This is in contrary with all efforts to stop and reduce the negative impact of habitat fragmentation.

Campanula calycialata Zlatković & Randjelović 1998, a Stara Planina endemic, is now probably extinct due to construction works on its small habitats at Babin zub in last few years. Other endemic plant species may follow and the biggest fear comes from the fact these endemics are confined to a very small area surrounding peaks of Babin zub and Midžor – exactly area that will be most affected by development and activities in large ski resort.

Additionally *Neobisium babinzub*, a pseudoscorpion species new to science has been described from locality of Babin zub <http://www.springerlink.com/content/810v4r2v142228g2/>. Other interesting and maybe undiscovered species might inhabit areas that will, as things are, turn into large ski resort.

Bog Fritillary (*Boloria eunomia*) is relict species of butterfly. In Serbia it can be found only in the region of Stara Planina Mt. Two of three main habitats are been completely and partially destroyed, while third one is planned to be turned into infrastructure for skiers. All the water streams are planned to be captured, leading to certain butterfly extinction from Serbia. Many other important species are living in the same habitat. Some of them include relict (eg. *Drosera rotundifolia*, *Parnasia palustris*) and endemic plant species (eg. *Rumex balcanicus*, *Angelica pancici*), and some are marked as strictly protected species (eg. *Crex crex*).

ADDITIONAL STRICTLY PROTECTED SPECIES IN THE REGION OF NP STARA PLANINA, THAT MAY BE ENDANGERED IN FUTURE

The strictly protected species are species of plants and animals listed under the Convention on the Conservation of European Wildlife and Natural Habitats, Resolution No. 5 (1998) of the Standing Committee concerning the rules for the Network of areas of special conservation interest (Emerald Network) (T-PSV/PA (2011) 7; Appendix 10).

Note: Due to lack of data and experts the groups of CRUSTACEA, ARACHNIDA and Molluscs are not included in the list

PLANTS

Armoracia macrocarpa

VERTEBRATES

Mammals

Spermophilus citellus

Lutra lutra

Rhinolophus ferrumequinum

Rhinolophus euryale

Rhinolophis hipposideros

Myotis capaccinii

Myotis emarginatus

Miniopterus schreibersii

Birds

Many species

Reptiles

Testudo hermanni

Emys orbicularis

Amphibians

Triturus karelinii (*Triturus cristatus karelinii*)

Fish

Gobio albipinnatus

Gobio uranoscopus

Sabanejewia aurata

Cottus gobio

INVERTEBRATES

Insects

Cerambyx cerdo

Lucanus cervus

Eriogaster catax

Callimorpha (*Euplagia*, *Panaxia*) *quadripunctaria*



*Photo 14: Skilifts and skitracks on Babin zub are situated in an ancient beech forest (*Fagus sylvatica moesiaca*). Most of them were built illegally without EIA. As a result, Construction inspection of Serbia ordered tearing down for some infrastructure objects. Even if builders do as ordered, damage to the nature will remain for many decades.*



Photo 23: Construction of a new hotel in Jabučko ravnište valley.



Photo 3: Lilium jankae populations growing at locality Jabučko ravnište, with newly built hotel in the background. The location is planned to host 6 large hotels, large sport centers and upcoming infrastructure leading to total destruction of this Lily population. Lyceana dispar Babin zub and Jabučko ravnište – photo documentation.



Photo 5: Peat meadows at Jabučko ravnište, supposed to be covered by artificial lake in the vicinity of hotels. This is important habitat for Lilium jankae, Crax crex, Boloria eunomia and other important species. Many plant species are considered endemics and relicts.



Photo 45: Babin zub where zone I is surrounded by ski infrastructure.



Photo 86: New road that cuts through the habitat of Boloria eunomia butterfly. The water now goes through the pipes, making the remaining habitat patch dry.



Photo 77: Creek at Jabučko ravnište that used to be surrounded by vegetation compiled of some endemic and relict species.



Photo 68: New ski tracks and lifts. Due to illegal construction inspection has ordered tearing this objects down.

The above mentioned Non Governmental Organizations are hoping that the Standing Committee and the European Union institutions have the legal authority to stop the destruction of the biggest protected area in Serbia, and to conduct further activities on sustainable land use that ensures wellbeing for both local people and biodiversity.

NGO EXPERTS

Given data include some unpublished scientific observations gathered during four years of intensive research in the region of Stara Planina Mt. by Serbian NGOs. For more information on certain group, please contact our experts.

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