



Društvo za opazovanje in
proučevanje ptic Slovenije
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To
The Prime Minister
Council of Ministers of the Republic of Bulgaria
1594 Sofia, 1 Dondukov Blvd, Bulgaria
gis@government.bg

The President of the the Republic of Bulgaria
1123 Sofia, 2 Dondukov Blvd, Bulgaria
priemna@president.bg

Slovenia, Ljubljana, 26.2.2013

Re: Amendments to the Management plan of Pirin National Park

Your Excellencies,

We are writing to you as representatives of international environmental and civil organizations, to express our concern regarding the amendments to the Management plan of the Pirin National Park (see Annex 1) that were recently approved by the High Expert Ecological Council by the Ministry of environment and waters of Bulgaria and are to be adopted by the Government. As far as we are informed those amendments will decrease the level of restriction regimes regarding the construction of new ski infrastructure and other associated activities in the park.

We are concerned that the amendments to the Management plan of Pirin National Park as a Natura 2000 site and UNESCO World Heritage Property, if adopted as proposed, would go against the public interest and contravene EU and Bulgarian environmental law and the international concepts for the management of protected areas. We therefore urge you to terminate the amendment procedure and guarantee that any amendment of the Management plan of the protected area would be subject to the legally required strategic environmental assessment procedures and thorough public consultations.

To our understanding, the amendments pose a new threat to the unique landscape of Pirin National Park which was significantly impacted by the development of ski facilities in the recent past. The amendments have not been subject to environmental assessments under SEA Directive and Habitats Directive, despite the fact that they regulate activities which could negatively affect a number of protected natural habitats and species in the park. Moreover, the amendments will hamper the development of sustainable forms of tourism in the region as long as they contravene the provisions of the Strategy for the development of the sustainable tourism in Pirin National Park, prepared in 2011 with the financial support of UNESCO (Annex 2).



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We consider the adoption of the proposed amendments as a dangerous precedent which will inevitably help to open up the restriction regimes in other protected areas and the Protected Areas Act.

Bulgaria is home to many of Europe's outstanding natural treasures, one of which is the Pirin National Park, and it has a special responsibility to preserve this wealth not only on behalf of Bulgarians but also, as a member of the European Union, on behalf of all Europeans.

Sincerely,

director of DOPPS – BirdLife Slovenia

Enclosed:

Annex 1:

Currently proposed amendments to the Management plan of the Pirin National Park
(downloadable from:

http://www3.moew.government.bg/files/file/Nature/Protected_areas/Bansko.pdf)

Annex 2:

The Strategy for the development of the sustainable tourism in Pirin National Park

(downloadable from: <http://pirin.bg/hcss/pdf/strategia.pdf>)