

**To Commissions of EU Parliament
Bruxelles
Belgium**

Belgrade, 26.Sept. 2010.

Respectful Madam/Sir,

According to the Constitution of the Republic of Serbia, everyone is required to protect natural rarities as well as scientific, cultural and historical heritages. Despite the clear statements in the Constitution, the Serbian Government initiated and started the construction of unsustainable ski centres throughout our country, on locations of great significance from the aspect of conserving the biodiversity. The greatest impact currently is on Stara planina (Nature Park) and Kopaonik (National Park). Beside these locations, under threat due to planned ski centres are Golija (Biosphere Reserve), Suva planina, Besna Kobila, Mokra gora and other higher mountain localities, although none of the sites are over 2.000 meters above sea level.

We are contacting you on behalf of 61 NGOs from whole Serbia which are fighting to save Nature park Stara Planina from destruction by a ski tourism center. The first category Nature Park Stara Planina, of exclusive importance for the Republic of Serbia, is situated about 300 km SE from Belgrade (capital of Republic of Serbia) and around 70 km from town Nish (Naisus). It's the biggest protected area in Serbia. Ministry of Infrastructure and Ministry of Economy and Regional Development are planning to build a huge tourist center on central parts of the Stara Planina mountain (Mt. Balcan) in Eastern Serbia. **Ministry of Infrastructure** forwarded the writing of Spatial Plan for sites of special assignment to the **Republic Agency for Spatial Planning** and **Institute for Architecture and Urbanism** which broke the law by ignoring opinion of the **Institute for Nature Protection** which is the necessary legal procedure. **Ministry of Economy and Regional Development** which hired the **Canadian company Ecosign** and company **Horwath Consulting Zagreb** to construct the Master Plan for tourism development on Stara planina with pre-investment study with physical and technical characteristics of ski center. During their work, they completely ignored the necessary legal procedure to contact the Institute for Nature Protection for its official opinion and by that ignored the environmental protection law. **These violations of the legal procedures broke the Law for Protection of Natural Environment by articles No. 34, No. 49, No. 51 and No. 127 (Official Gazette of Republic of Serbia: No. 66/91, No. 83/92, No. 53/93, No. 67/93 and No. 153/2004). Company Ecosign, from Canada, and their partner Horwath Consulting Zagreb** were not professional because of the fact that they didn't make any contact with the Institute for Nature Protection of Serbia and P.E. Srbijasume (Serbian Forests Public Company) which is a manager of the Stara Planina Nature Park, ignoring the fact that the planned ski resort is situated in the heart of Stara Planina Nature Park. Therefore, Master plan is illegal and catastrophic for biodiversity and habitat conservation of the mountain. The draft Spatial Plan for the tourist region and Nature Park Stara Planina also, doesn't respect the fact that the plan is about an protected area and it's completely directed towards ski tourism and Stara planina landscape. According to those plans, inside the Nature Park Stara Planina will be constructed about 40 ski lifts, nearly 30 ski tracks (in total length of more than 100 km) and 2 large tourist complexes on locations which are of exceptional significance for conserving the biodiversity. This huge tourism center will have capacity for up to 40.000 people (according to Master Plan) and is situated on the shoulders of the highest parts of the mountain - peaks Midzor (2170m), Babin zub (1758m), Tupanar (1964m),... Cost of the project during several developing years is between 260 million and 300 million Euros. One of the centers (the largest one) will be on one peat meadow Jabučko ravnište which is against the Ramsar Convention for wet-lands which Serbia ratified. Also, Dojkino vrelo peat meadow, also on the list of high priority localities for protection under Ramsar Convention, will be used as a water source for the future ski resort.

Unfortunately, the Government of Serbia constructed the first ski lift in the Babin zub area in 2006, without any planning documents and violating Serbian legislation. The first ski track was opened on 30th December 2006 next to the peak Babin zub, causing huge erosion. Therefore, this was the first big illegal activity and destruction which was conducted on the Mt. Stara planina by the Government of Serbia (**Ministry of Infrastructure and Ministry of Economy and Regional Development**). **On that occasion, 6 official laws of Republic of Serbia were violated: Law on Planing and Construction (Official Gazette of Republic of Serbia: No. 47/2003 and No. 34/2006), Law on Forests (Official Gazette of Republic of Serbia: No. 46/91, No. 83/92, No. 53/93, No. 54/93, No. 60/93 - revision., No. 67/93, No. 48/94, No. 54/96 and No. 101/2005), Law on Surface Waters (Official Gazette of Republic of Serbia: No. 46/91, No. 53/93, No. 67/93, No. 48/94, No. 54/96 and No. 101/2005), Decree on the Protection of Park of Nature Stara planina (Official Gazette of Republic of Serbia: No. 19/97), Law for Protection of Natural Environment by articles No. 34, No. 49, No. 51 and No. 127 (Official Gazette of Republic of Serbia: No. 66/91, No. 83/92, No. 53/93, No. 67/93 and No. 153/2004) and Decree on the Protection of Natural Rarities (Official Gazette of Republic of Serbia: No. 50/93).** On Babin Zub, ski lifts have already been constructed and enormous forest complexes have been cut through for planning ski routes. On the barren steep mountainous ground, inevitable land slides and erosion have been initiated and it is only a question of time when the remaining thinned out fragments of century old spruce forests will also be damaged. Immeasurable destruction has already been made by widening the existing road to the ski lifts. Forest complexes have been destroyed and water erosion is already causing significant damage.

This program of ski-resort is officially based on existing society consensus which in the case of Stara Planina is not correct. It is claimed that the Master Plan has been built upon detailed analysis of recognized potentials of Stara planina. However, it is neither possible to find evidence of social surveys of local communities nor details of local community consultation by the creators of the Spatial and Master Plan (Ministry of Infrastructure and Ministry of Economy and Regional Development together with Ecosign and Horwath Consulting Zagreb) for Stara planina. Since this is the case, it is not honest to claim transparency in realization of this project. Another serious anomaly of the project is to highlight that there is a 5 month season under snow at altitudes above 1700 meters. In recent years, the Balkan Peninsula is one of Europe's region's where climate change is most recognizable. Ironically, the opening of the first ski lift on the mountain on 30th December 2006 is remembered for the season when minimal quantities of snow fell in Serbia. Sadly however, on that day, illegal government activities became official.

For its exceptional significance in protecting the entire Natural heritage, Geological heritage, gene pool, species and ecosystem diversity of Serbia and the Balkan Peninsula, the **Serbian Government proclaimed in 1997 Stara Planina as a Nature Park, enjoying the First Category of Protection - as of utmost importance for the country (Official Gazette of Republic of Serbia: No. 19/97).** Besides, Stara Planina is on the list of **potential Serbian geological-parks**. Stara Planina also has the status of significant International region. It is on the list for **International Important Bird Areas** (IBA-Bird Life International, 1997), on the list for **International Important Plant Areas** (IPA-PlantaEuropa, 2005), on the list of **Prime Butterfly Areas** in Europe, on the preliminary list of **Cross-border Biosphere Reserve under UNESCO protection (Man and Biosphere, UNESCO)**, on the list of **Important Ramsar Sites** (peat meadows), on the **Emerald list** (sites significant for conserving the European ecological network), on the list of cross-border protected region placed in the **European programme Green Belt** (IUCN), on the list of **ProGEO** geological heritage sites under The European Association for the Conservation of the Geological Heritage (since 2000), cross-border project that is being realized at the moment: **Cross-border cooperation through joint natural resources management Promotion of networking and cooperation between South-East Europe with Bulgaria is in the group of projects of Stability Pact for South-Eastern Europe ReREP.** This model of cross-border cooperation is in this case recommended as a solution for the general protection of biodiversity, and at the same time

as a **Park of Peace** in the European Initiative **Parks for Life** and in **Pan-European strategy for biological and landscape diversity**. This project was initiated in 1999 by the **Ministries for Natural Environment of European Union**. Such a National and International status of Stara Planina results from **Biodiversity Convention** which Serbia ratified in 2001, the **Bonn Convention** and **Bern Convention** (**Official Gazette of Republic of Serbia: No. 102/07**), **Ramsar Convention** (ratified in 1992), from the **1992 Council of Europe Directive on Habitats**, joining **ProGEO** in **1995** and from many other International agreements .

Flora

There are 344 moss species on Mt. Stara Planina. Among them are numerous species which are protected by various international and Serbian laws. Species that live on decaying wood and peat meadows are extremely threatened. Great danger for these species present hydro-geological works because of great changes in the water balance of their habitat. Very threatened is *Buxbaumia viridis*, protected with Bern Convention and Habitat Directive in the whole of Europe, because of habitat destruction (wet tree trunks), here threatened because of forest destruction. It's similar with *Dicranum viride* (which is also protected with Bern Convention), and some white peat meadow moss species: *Sphagnum capillifolium*, *Sphagnum cuspidatum*, *Sphagnum palustre*, *Sphagnum rubellum*, *Sphagnum squarrosum* and *Sphagnum subsecundum* which are protected with Habitat Directive. From the European Red Book of Bryophyta, the following species are present: *Brachythecium geheebii*, *Bryum neodamense*, *Encalyptra microstoma*, *Grimmia caespiticia*, *Lophozia descendens*, *Paraleucobryum sauteri* i *Pseudoleskea saviana*. With ski-center construction on the Jabučko ravnište, the peat meadow and water usage from Dojkino vrelo peat meadow, two most important peat meadows will be destroyed. This is a direct threat for all peat meadow associated moss species: *Anastrophyllum minutum*, *Barbilophozia floerkei*, *Barbilophozia hatcheri*, *Bazzania trilobata*, *Bazzania tricenata*, *Lophozia adscendens*, *Leiocolea badensis*, *Leiocolea collaris*, *Leiocolea heterocolpos* i *Scapania aequiloba* i mahovine *Amphidium mougeotii*, *Anomodon rugelii*, *Buxbaumia viridis*, *Cynodontium brutonii*, *Dichodontium palustre*, *Dicranum fuscescens*, *Dicranum viride*, *Diphyscium foliosum*, *Encalypta ciliata*, *Grimmia caespiticia*, *Physcomitrium piriforme*, *Pohlia longicolla*, *Orthotrichum obtusifolium*, *Paraleucobryum sauteri*, *Pseudoleskea saviana*, *Sphagnum capillifolium*, *Sphagnum cuspidatum*, *Sphagnum palustre*, *Sphagnum rubellum*, *Sphagnum squarrosum*, *Sphagnum subsecundum*, *Tetraphis pellucida* and *Timmia bavarica*.

Diversity of flora of the Serbian part of the Stara Planina mountain (second half is in Bulgaria) with at least 1700 growing plant species/subspecies, of which 116 (9,7% from all recorded species) are locally or regionally endemic. Endemics are the most threatened category and also the most important floristic elements for the biodiversity. An example of the danger of wild tourism development is seen in the near extinction of Winged Bell (*Campanula calycialata*) which grew only on Stara planina whose one part of it's fragile population was destroyed during the first phases of the project. On Stara Planina grow 9 species from the World Red List (*Cota macrantha*, *Dianthus banaticus*, *Scabiosa fumaroides*, *Pedicularis heterodonta*, *Tozzia alpina*, *Acer heldreichii*, *Delphinium fissum* and *Viola dacica*), 42 species are on the European Red List of which 4 are critically endangered (*Lycopodium complanatum*, *Pinus mugo*, *Rosa balcanica*, *Androsace elongata*), 3 species from the Habitat Directive (*Gentiana lutea*), 45 species from the CITES list (41 species of orchids), 179 species with the regional IUCN threat status, 14 species from the National Red List and 153 species from that are protected in various ways by the national legislature. Also, 21 plant species are locally critically endangered (IUCN YUCR): *Lathyrus pancici*, *Alnus viridis*, *Androsace elongata*, *Angelica brachyradia*, *Bupleurum pachnospermum*, *Campanula thyrsoidea*, *Clematis alpina*, *Eranthis hyemalis*, *Gentiana lutea*, *Heracleum verticillatum*, *Pinus mugo*, *Juniperus sabine*, *Knautia ambigua*, *Lycopodium complanatum*, *Oenanthe stenoloba*, *Peucedanum*

minutifolium, *Rosa balcanica*, *Senecio pancicii*, *Swertia punctata*, *Tozzia alpina*, *Trifolium badium* var. *pseudobachium*. From the Decree on the Protection of Natural Rarities (Official Gazette of Republic of Serbia: No. 50/93) 40 species are present and therefore it is illegal to damage and destroy their habitat. Bern Convention is also protecting 2 species growing on the mountain: *Campanula abietina* and *Lilium jankae*. Peat meadows are habitats for dozens of endemic plant species. On peat meadows of Stara Planina, grow about 50-70 endemic species on average. It should be emphasised that Jabučko ravnište is the largest peat meadow and it is threatened because this illegal project is planning to make a tourist development covering this fragile habitat with concrete buildings and parking lots. The second largest peat meadow of the mountain, Dojčino vrelo, will be used as water source, which will severely change the hydrological dynamic of the site and hence irreparably damage it as a habitat. The most important endemic plant species growing on these peat meadows are *Senecio pancicii*, *Ciscium heterotrichum*, *Cardamine aeris*, *Barbarea balcana*, *Geum coccinum*, *Rumex balcanicus*, *Silene asterias*, *Dactylorhiza cordygera*. Beside them, one of the most important is Sundew (*Drosera rotundifolia*), a very rare and very threatened insectivorous plant species which became extinct in other parts of Serbia. It should be remembered that mountain peat meadows today represent the most scarce and threatened World ecosystems. According to IUCN categorization, they are specified among fragile (very sensitive) ecosystems, in which the smallest changes of abiotic and biotic factors are critical (the disappearance of only 1-2 species can result in total collapse of the system.). Besides, peat meadows are centers of biodiversity and their conservation is the responsibility of our country (Serbia) according to the Directives signed in Rio de Janeiro in 1992. As types of wetland habitats which can not be renewed, the Ramsar Convention (at the 8th Conference in 2003) identifies bogs together with mangroves and coral reefs, as the most vulnerable and most threatened due to habitat loss and degradation, which need necessary urgent and priority activities for their protection and conservation (*Global Review of Wetland Resources and Priorities for Wetland Inventory*). Among the basic threatening factors, physical changes of the terrain are taken into account. Some other endemics are endangered because of parking lots and ski track constructions: *Jovibarba heuffelii*, *Minuartia bulgarica*, *Silene lerchenfoldianae*, *Campanula calycialata*, *Campanula trojanensis*, *Saxifraga paniculata*, *Symphyandra wanneri*, *Alyssum wierzbickii*, *Alium melanantherum*,... What is also very important to highlight is that diverse forest vegetations (*Piceetum excelsae serbicum*, *Fagetum subalpinum serbicum*, *Fagetum submontanum mixtum silicicolum*) are protecting steep slopes of the mountain from erosion. Construction of ski tracks (logging, bulldozer activities) on fragile steep slopes will unavoidably begin a process of erosion; this has already happened on some parts of the mountain where development was illegally started.

Fauna

On Stara Planina live 146 species of butterflies, of which 3 are protected by Bern Convention (Clouded Apollo *Parnassius mnemosinae*, Mountain Apollo *Parnassius apollo*, Large Blue Butterfly *Maculinea arion*), 4 are declared as national rarities by Decree on the Protection of Natural Rarities (Old World Swallowtail *Papilio machaon*, Clouded Apollo *Parnassius mnemosinae*, Mountain Apollo *Parnassius apollo*, Southern Festoon *Zerynthia polyxena*). By IUCN categorization, among butterflies that live on Stara Planina there are 6 endangered species (Almond-eyed Ringlet *Erebia albertanus*, Bulgarian Ringlet *Erebia orientalis*, Lesser Purple Emperor *Apatura iris*, Poplar Admiral *Limentis populi*, Zephyr Blue *Plebeius pylaon*, Old World Swallowtail *Papilio machaon*), 37 vulnerable and 21 rare species. From the European conservation concern, there are 14 species recorded. Species *E. orientalis*, *E. albertanus*, Bog Fritillary *Proclossiana eunomia* and Spinose Skipper *Muschampia crebrellum* in Serbia live only on Stara Planina. High altitude specie *E. orientalis* is a Glacial relict, *E. albertanus* is a Tertiary relict, while *P. eunomia* is crucially dependent on peat meadow vegetation - and all three species are living on the territory of the planned mega ski resort (Babin zub, Midzor, Topli Do). 69 species are

interesting from aspects of protection, while 64 are in the 3 most threatened categories. The most important localities for butterflies on Stara Planina are Babin Zub (planned to be a huge parking lot), Crni Vrh (planned for tourist center and parking lots), Midzor (planned ski tracks nearby) and Topli Do (planned for one of the tourist resort centres).

Considering fish fauna of the mountain (26 species), the most important is Brown Trout (*Salmo trutta*) with the very limited dispersal of its local strain of the unique mtDNA haplotype different from other populations in Serbia, being similar to the Caucasian Brown Trout. In addition, in the cold mountain rivers lives the Golden Loach (*Sabanejewia aurata*) which is under protection by Decree on the Protection of Natural Rarities. Also, Bern Convention issues protection of six fish species which also occur in the streams and rivers of Stara Planina Mt. (Spirin *Alburnoides bipunctatus*, Balkan Barb *Barbus balcanicus*, Spined Loach *Cobitis taenia*, Balkan Loach *Cobitis elongata*, Golden Spined Loach *Sabanejewia aurata*, Kessler's Gudgeon *Gobio kessleri*). Since the use of mountain springs as water sources for the demands of accommodation facilities compromises the current water balance, the expected effects on aquatic animals will be extremely harmful. Numerous streams and small rivers that are fragile ecosystems will also be threatened by pollution from effluent and drainage.

On Stara Planina live 18 species of amphibians and reptiles, of which 10 are protected with Bern Convention (Yellow-bellied Toad *Bombina variegata*, European Green Toad *Pseudepidale (Bufo) viridis*, Dice Snake *Natrix tessellata*, Nose-horned viper *Vipera ammodytes*, Smooth Snake *Coronella austriaca*, Aesculapian Snake *Zamenis longissimus*, Wall Lizard *Podarcis muralis*, Eastern green lizard *Lacerta viridis*, Sand Lizard *Lacerta agilis* and Snake-eyed skink *Ablepharus kitaibelii*), while 8 are protected with Decree on the Protection of Natural Rarities (Fire Salamander *Salamandra salamandra*, Yellow-bellied Toad *Bombina variegata*, Common Toad *Bufo bufo*, European Green Toad *Pseudepidale (Bufo) viridis*, Viviparous Lizard *Zootoca vivipara*, Snake-eyed skink *Ablepharus kitaibelii*, Aesculapian Snake *Zamenis longissimus* and Smooth Snake *Coronella austriaca*). There are only 3 known places in Serbia where *Z. vivipara* populations are found. Only one population that wasn't threatened by human activities up to this time was on Stara Planina, near the locality (one of the mountain peaks) Babin Zub, which is planned as the starting point for several ski-tracks and also predicted as a parking lot. It is almost certain that it will be lost if the works proceed.

So far, 206 bird species are recorded on Stara Planina. From that number, 140 bird species are protected by Bern Convention, but some of them have already become extinct in the past on Mt. Stara Planina due to human activity (*Gypaetus barbatus*, *Tetrax tetrax*, *Aegipius monachus*, *Gyps fulvus*, *Falco naumanni* and *Neophron percnopterus*). For example, by cutting one road for all-terrain vehicles to the mountain peak Babin Zub in 1980's, three species that were nesting there disappeared (*Pyrrhocorax graculus*, *Falco peregrinus* and *Aquila chrysaetos*). This recorded event provides a sobering warning of the likely implication for nesting birds should such a large development go through. Localities that are planned to be developed into ski centers and ski tracks are also among the most important for rare and endangered nesting bird fauna.

The following localities are under consideration for development which will endanger nesting / bird species which bred there in the recent past and which are protected by Bern Convention and Decree on the Protection of Natural Rarities:

- Golema Reka mountain slope - Capercaillie *Tetrao urogallus*, Alpine Accentor *Prunella collaris*, Nutcracker *Nucifraga caryocatactes*, Short-toed Eagle *Circaetus gallicus*, Honey Buzzard *Pernis apivorus*, Crested Tit *Parus cristatus*
- Toplodolska Reka river - Black Stork *Ciconia nigra*, Honey Buzzard *Pernis apivorus*, Peregrine *Falco peregrinus*, Long-legged Buzzard *Buteo rufinus*, Golden Eagle *Aquila chrysaetos*, Rock Thrush *Monticola saxatilis*, Rock Bunting *Emberiza cia*
- Bratkova strana - Capercaillie *Tetrao urogallus*, Horned Lark *Eremophila alpestris balcanica*, Short-toed Eagle *Circaetus gallicus*, Saker *Falco cherrug*, Rock Thrush *Monticola saxatilis*
- Peaks Midžor and Tupanar - Saker *Falco cherrug*, Dotterel *Eudromias morinellus*, Rock Thrush *Monticola saxatilis*, Tawny Pipit *Anthus campestris*, Horned Lark *Eremophila alpestris balcanica*
- Peak Babin Zub - Peregrine *Falco peregrinus*, Alpine Chough *Pyrrhocorax graculus*, Alpine Accentor *Prunella collaris*, Crag Martin *Hirundo rupestris*, Rock Partridge *Alectoris graeca*, Rock Thrush *Monticola saxatilis*
- Jabučko Ravnište peat meadow - Woodcock *Scolopax rusticola*, Redstart *Phoenicurus phoenicurus*, Whinchat *Saxicola rubetra*, Nightjar *Caprimuglus europaeus*, Tawny Owl *Strix aluco*, Grey Partridge *Perdix perdix*, Black Woodpecker *Dryocopus martius*, White-backed Woodpecker *Dendrocopos leucotos*

It is of great importance for these species that their habitat remains preserved. This is especially important for Dotterel (one of just several potential breeding place on Balkan peninsula), Balcan Horned Lark *E. alpestris balcanica* (on of just few breeding localites in Serbia), Saker, Capercaillie (only locality in E Serbia), Woodcock (the most important breeding localites in E Serbia), Alpine Accentor (Balcan subspecies *subalpina*, which has only 5 more breeding localites in Serbia)

There are some 60 species of mammals on Stara Planina, among which some are very rare. Such is the case with Snow Vole (*Chionomys nivalis*), an extremely rare living fossil of Tertiary origin which lives on the highest slopes of the mountain and it is directly threatened by the ski resort. Together with Snow Vole, under Decree on the Protection of Natural Rarities, additional 19 mammal species and their habitat are protected. On the direct threat of habitat destruction are Lynx (*Lynx lynx*), Marbled Polecat *Vormela peregusna*, Mole Rat (*Spalax leucodon*), Suslik (*Spermophilus citellus*), Water Shrew (*Neomys fodiens*), Southern Water Shrew (*Neomys anomalus*). Also, Bern Convention, Apendix II is protecting 6 species: Suslik (*S. citellus*) Brown Bear (*Ursus arctos*), Marbled Polecat (*Vormela peregusna*), Grey Wolf (*Canis lupus*), Wild Cat (*Felis silvestris*) and Otter (*Lutra lutra*), while Apendix III also protects an additional 12 species. Only the Grey Wolf and Wild Cat in Serbia are not protected by law and sadly enough, considered as game animals. Especially those from Apendix II are threatened by habitat destruction from the building and presence of ski resort.

Among all these above mentioned species are many Tertiary and Glacial relicts, Balkan endemics, natural rarities of Serbia, threatened and critically endangered species of global significance for preserving the biodiversity. Beside the living creatures, there is also one very important dinosaurian track fossil site from lower Triassic from numerous mostly unknown species. Since this is one of the oldest dinosaur sites in the World, with traces of unknown species, more intensive research is

necessary for discovering the true identity of creatures likely to be new to science. If this project goes on, this site may also be negatively affected and possibly destroyed.

According to many scientific findings, this kind of tourism is likely to be unsustainable due to climate change (higher warming temperatures and lower snow yield), strong competition in the region (many ski resorts in the region as Bansko, Borovec, Kopaonik, Durmitor and ski areas in Slovenia) and diversity destruction which will take effect. An assumption of developers is that program implementation will lead to complementary development and better living standard of local population. This is not a sufficient argument for realization of the stated Master Plan because in rural regions of Stara Planina exist many alternative and environmentally benign development options. These measures include support for traditional animal husbandry based on the use of high value mountain grasslands, support to organic farming, support to branding and marketing of agricultural products with accent on typical products (sheep products, honey, wool carpets, medicinal plants, authentic hand crafts, cheese and other dairy products) and support to development of rural or ethno-tourism projects and other aspects of sustainable tourism. Stated development of ethno-tourism must be followed with state fundings in local infrastructure reconstruction (roads, water supply, waste management, telecommunication, etc). Measures in rural / ethno-tourism development must be orientated toward existing villages and especially toward ones with preserved authentic unities, where financial help is needed for reconstruction and adaptation of objects in local ethno-architecture style, with prerequisite for accomplishing terms for tourist's categorization.

It is vigorously recommended that an alternative of rural (agro / eco and ethnic) tourism could be developed and made profitable on a sustainable basis without major habitat destruction. This would require less investment and would benefit and preserve the local community. This kind of tourism would improve the quality of life of local people by enabling them to find additional outlets for their food and craft products and local services. Eco-tourism has been previously recommended by IUCN as the only acceptable kind of tourism development of this region. Also the World Bank is now working on a project with local communities to improve ecological management of Stara Planina Nature Park (142,000 ha), biodiversity and sustainable natural resource-use incorporated in a major agricultural and rural development program, for example including c.30,000 ha of grasslands under sustainable grazing.

Chronology of events on Stara planina:

1997. — Stara planina proclaimed as a Nature Park.

2006. — The Government of Serbia started the first illegal constructions.

2007. — The illegal Master Plan was elaborated for the development of mountain tourism

2007. — The electronic petition was created on www.thepetitionsite.com/1/save-staraplanina-petition.

2007. — Attitudes of 61 NGO were publicly presented on www.staraplanina.rs and the relevant problems were presented also in the media (newspapers, television and radio).

2008. — During the public insight into the Spatial Plan of the Nature Park Stara Planina, without any argument, the views and suggestions of the NGO sector were neglected, the same procedure being repeated in the case of the document Strategic evaluation on environmental impact. Views of the Institute of nature protection and Srbijašume were also nearly completely neglected.

2008. — Illegal Master plan was adopted allowing the development of ski tourism in the area of protected areas of the Nature park.

2008. — The Director of the Institute for Nature Protection in Belgrade was replaced, her view being totally ignored during the development of the on the Master Plan.

2009. – The Spatial Plan for Nature Park Stara planina has been adopted in a virtually unmodified version in respect to the original. A river was dammed about 1.000 meters below Babin zub and from there, via kilometers of pipes going uphill, water for artificial snow is pumped, thus wasting enormous amounts of energy.

2010. — The capturing of water from natural springs and construction of 2 hotels on Jabučko ravnište has started.

During the campaign of the Association for the Protection and Sustainable Development of Stara planina (61 NGOs), we respected all legal mechanisms of the Republic of Serbia and we were supported with a positive attitude from the European Commission which unfortunately did not help in solving the problem. Here we consider in the first place filling complaints to the Serbian Constitutional Court, written complaints during public discussions concerning the Spatial Plan, Master Plan and Study on the Evaluation of Environmental Impact of the Spatial Plan in which were disproportionately many inaccuracies and to the biodiversity harmful plans of activities.

Beside the legally binding articles in the law, opposition of the official guardian of this Nature Park (Srbijašume) and the Institute for the Protection of Nature (until the replacement of the Director who was an expert and opponent the ski centre), the Master Plan was accepted and adopted although it contained numerous mistakes and represented an exceptionally bad directive for nature protection, conservation as well as the biodiversity protection in this area.

As the construction of the first two hotels from the planned six has begun on the location of Jabučko ravnište, we ask You to consider our appeal in the shortest possible time and in case You possess adequate mechanisms, influence the Serbian Government to stop further constructions inside the boundaries of this natural resource. Another bad characteristic of these activities is that the ski centre and its infrastructure (roads, water supplies) are financed from the limited and small budget of the Republic of Serbia, this is not a practice in other countries which are developing and having their own ski tourism.

Reminding that the politics of EU are that ski centres are not to be constructed below 2.000 meters above sea level (in Serbia this altitude should be even higher, as Serbian mountains are far to the South in respect to the colder Alps), Serbia as a country with pretensions joining the EU should pay much more attention where and how it invests its restricted finances. It is also problematic that the investor for the two mentioned hotels now under construction is from Spain (Sol Melia, <http://www.solmelia.com/home.htm>), and therefore from the EU also. Because of that the company should be informed that it in this way participates in the illegal threat to the environment and biodiversity of European importance. The company in this way actually violates the Constitution of the Republic of Serbia. Considering that with all the current and following activities, numerous laws were violated, for which nobody was taken responsible, the legality and good intentions of the entire project are under question.

In the end, we also wish to stress that from the experience of NGOs in Serbia, the Serbian Government always tries to evade the Aarhus Convention although in Serbia it is officially implemented from the 25th of May, 2009 (Official Serbian Gazette, No.38, 2009). Also, the censorship in printed and electronic media is most dramatic, especially when the views of NGOs concerning environmental subjects are in question.

Photographs of the recent works (September 2010) on Jabučko ravnište peat meadows:





More texts and photographs on www.staraplanina.rs.
Asociation for Conservation and Sustainable Development of the Stara planina