



White Elephants in the Green Mountains

Ski developments in **Bulgaria**



WWF Danube-Carpathian Programme, 2008

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Photo front cover: Vitosha National Park, Bulgaria © Konstantin Ivanov

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This report and other related information and materials are available on the Internet at: **<http://www.panda.org/dcpo>**

Executive summary

“White elephant”: *something that has cost a lot of money but has no useful purpose* (Cambridge dictionary). *A white elephant is a valuable possession which the owner cannot dispose of, but whose cost exceeds its supposed usefulness.* (Wikipedia)

There is an ongoing boom in construction of new and expansion of existing facilities for downhill skiing across many parts of Central and Southeastern Europe, especially in Bulgaria, Romania, Slovakia and Ukraine. Most if not all of these areas are being developed with significant public sector support, including billions of Euros in state and EU funds as well as considerable political backing, including even tacit support by authorities for illegal activities. And yet a number of factors, including rising energy costs, climate change and external costs including water abstraction and biodiversity loss suggest that many of these areas warrant critical appraisal of long-term costs and benefits, both in terms of profitability and public interest. In many cases, we risk having “white elephants” dotting our increasingly green mountains – expensive investments whose cost, both financial as well as social and environmental, exceed their supposed usefulness.

Few if any of the ski developments seem to seriously take into account the realities of climate change, which is now happening in our region more quickly than anticipated. Most of the areas being developed are located at less than 1,500 meters above sea level, below which snow cover is increasingly uncertain and which in the Alps now serves as a rule of thumb for the viability of ski areas. Most of the areas in Bulgaria in particular are being constructed in national parks and other protected areas, often with inadequate or no proper assessment of impacts on nature values. Indeed, there are all too many cases, e.g. in the Pirin and Rila National Parks, or in Vitosha Nature Park near Sofia, where ski facilities have been or are being constructed illegally, in violation of national and in many cases EU legislation.

Public authorities, including national and regional governments as well as EU institutions, should take a much more critical look at the ski developments that are being developed throughout the region. The development benefit of these projects could be limited, especially given the realities of climate change; and the costs – financial, social and environmental – could be prohibitive. Developers and financiers of ski areas must also be more careful in pursuing their projects, factoring into their profit calculations the realities of changing climate as well as increasing costs e.g. for environmental goods and services. Skiers also have a moral responsibility not to support at least those ski areas with the greatest environmental impacts, especially those that have been constructed illegally.

About this study

This country report is part of a broader study undertaken by the WWF Danube-Carpathian Programme and focusing on selected countries in the Carpathian Mountains (Romania, Slovakia and Ukraine) as well as in Bulgaria, and including a synthesis as well as individual country reports.

The country reports consist of two parts: an overview of legislation, programmes and policies relevant to the development of ski areas and infrastructure, including e.g. tourism and spatial development plans, national and regional development programmes, etc.; and a survey, based on completion of a questionnaire, of both existing and planned ski facilities, including description of the project, investors, public sector support as well as possible/likely impacts on natural values and resources. Information and data for the national report was collected through a mixture of desk-based research, phone calls and meetings. The research undertaken was considerable, but not exhaustive, relying on information that could be readily accessed.

It is important to note that WWF is not against skiing. Skiing provides recreation and sport, and can provide an important stimulus to local economies. There are indeed many areas in our region where development of downhill skiing is appropriate and even desirable. But any investment must be prudent, with a longer-term perspective of relative costs and benefits, including environmental and social as well as economic factors.

Europe's treasure chest

The mountainous areas of Bulgaria, including the Balkan Mountains and the Rila-Rodope Mountain Range, contain outstanding natural features that are of global importance, including the Rila and Pirin National Parks, which have been recognised, respectively, as a certified PAN Parks wilderness area and UNESCO World Heritage Site.

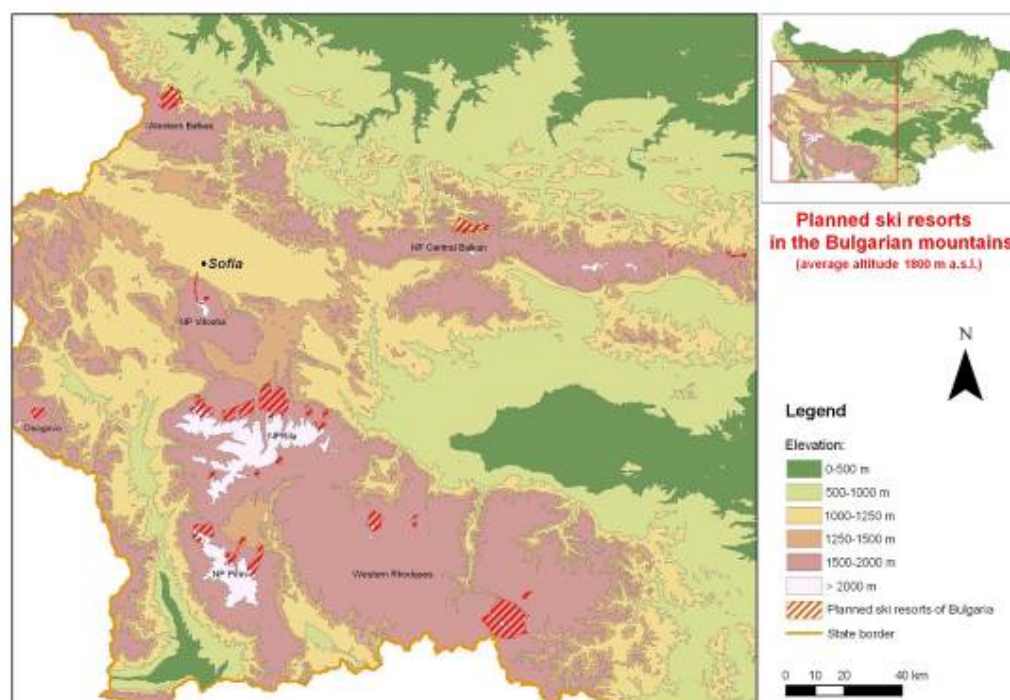
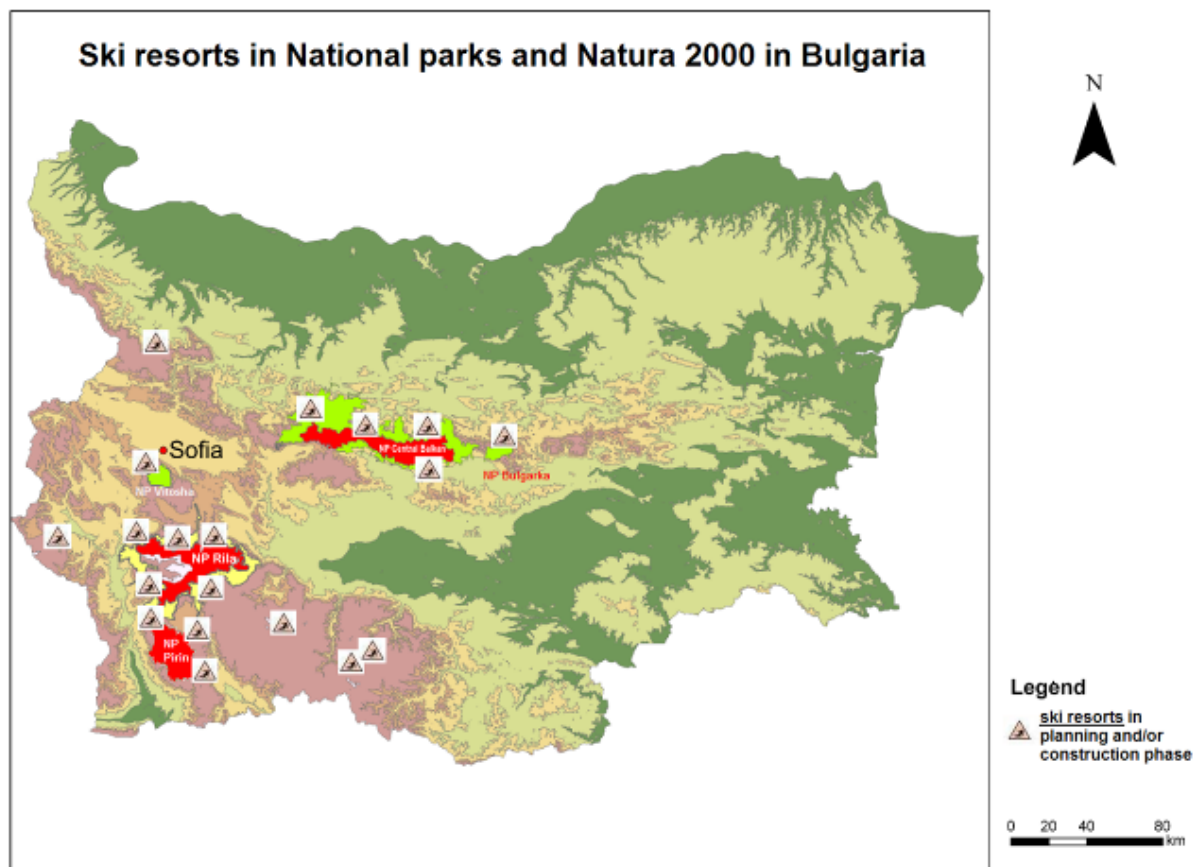
These areas are formally protected by a mixture of often overlapping international, EU and national legislation, including the EU's Natura 2000 network of specially protected sites as well as national designations e.g. as national and nature parks.

White Elephants in the Green Mountains

Overview of ski resorts in Bulgaria (planned and constructed)

Resort name	Issues
Ski resorts in and near Rila National Park and Natura 2000 site	
Ski centre “Kartala”	The project is situated adjacent to Rila National Park and in the proposed Natura 2000 site “Rila buffer” – the only proposed Natura 2000 site that the Bulgarian Government has not nominated for inclusion in the Natura 2000 network, apparently in response to pressure from investors. A ski lift is being constructed illegally, without completed impact assessments and permits, while a ski run has been extended without even informing the authorities.
Dolna Banya – Ibar peak	This project, which is still at the concept stage, is part of a larger project including facilities situated on the territory of Dolna banya, Kostenets and Belovo municipalities, and which are planned to host the Winter Olympics and international ski championships. Most of the projected facilities are located within the boundaries of Rila National Park and the “Rila” Natura 2000 site.
Kostenets	This project, which is still at the concept stage, is part of a larger project including facilities situated on the territory of Dolna banya, Kostenets and Belovo municipalities, and which are planned to host the Winter Olympics and international ski championships. The major part of the project is located in Rila National Park and in a Natura 2000 site, with some facilities situated near the Ibar Nature Reserve.
Treshtenik	The project is situated adjacent to Rila National Park and in the proposed Natura 2000 site “Rila buffer” – the only proposed Natura 2000 site that the Bulgarian Government has not nominated for inclusion in the Natura 2000 network, apparently in response to pressure from investors.
“Super Borovets” (Samokov-Borovets-Beli Iskar)	The planned “Super Borovets” ski area with 30 ski lifts and 33 ski runs is located in the proposed “Rila Buffer” Natura 2000 site – the only proposed Natura 2000 site that the Bulgarian Government has not nominated for inclusion in the Natura 2000 network, apparently in response to pressure from investors. Construction of one of the lifts has begun illegally, before completion of necessary assessments and permitting.
Iskovete-Govedarts-Maljovitsha	The planned ski area with 13 lifts and 20 runs is located in the proposed “Rila Buffer” Natura 2000 site – the only proposed Natura 2000 site that the Bulgarian Government has not nominated for inclusion in the Natura 2000 network, apparently in response to pressure from investors. A Strategic Environmental Assessment is currently being undertaken.
Panichiste	The planned ski area with 21 lifts and 19 ski runs is located within the territory of Rila National Park and Rila Buffer proposed Natura 2000 site. Construction of a number of facilities has already begun, illegally, without an environmental impact assessment and despite the rejection of the Strategic Environmental Assessment for the project. The European Commission is considering an official

	complaint regarding the project.
Ski resorts in and near Pirin National Park and Natura 2000 site	
Bansko Ski Area	The Bansko ski area has become infamous as the first major ski area to be built in a Bulgarian protected area, IUCN category II. The facilities, whose construction was permitted in 2000 and are ongoing, penetrate deep into the core areas of Pirin National Park and UNESCO World Heritage Site as well as Pirin Natura 2000 site and have led to the destruction of species and habitats of European importance. Many of the facilities have been constructed illegally, without or against obligatory impact assessments and permits.
Dobrinishte Ski and Tourist Area	The planned ski zone would penetrate deep into the core areas of Pirin National Park and World Heritage Site as well as Pirin Natura 2000 site and would lead to the destruction of species and habitats of European importance.
Kulinoto Ski and Golf Complex	Of the 450 ha planned for this project, 48% would be located in Pirin National Park and World Heritage Site as well as in Pirin Natura 2000 site. The detailed spatial plan has been completed and approved, but without any environmental impact assessment and against the current management plan for the Pirin National Park.
Ski resorts in Stara Planina Area	
Berkovitsa (Berkovitsa Municipality)	This moderate sized project (€100 million; 100,000 skiers/year) will affect 269 ha of habitats and species of European importance, including areas of special importance to the European lynx.
Tryavna (Tryavna Municipality)	A relatively small project (114,000 skiers/year) that will affect Bulgarka Nature Park and some 45 ha of habitats and species of European importance, including Brown bear, European wolf and Black stork. The relatively low altitude could spell trouble in terms of snow cover and length of season, as well as problems with water abstraction, deforestation and erosion.
Uzana (Gabrovo Municipality)	This relatively small project (€240,000; 30,000 skiers/year) will affect 185 ha of habitats and species of European importance, including Brown bear, European wolf and Corncrake. The relatively low altitude could spell trouble in terms of snow cover and length of season, as well as problems with water abstraction, deforestation and erosion.
Ski resorts in and near Rhodopi Mountains	
Perelik Ski Area	The €150 million project (6 million skiers/year), which is to be completed in 2020, will lead to the destruction of 650 ha of habitats and species of European importance, including e.g. the Brown bear and European wolf.
Ski resorts in Vitosha Nature Park and Natura 2000 site	
Aleko Tourist and Ski Centre	The existing Aleko Ski Centre is located inside Vitosha Nature Park. A private investor is planning the three-fold extension of the ski zone despite a ban on new construction in the Park Management Plan.



Case study: Bansko Ski Zone, Pirin National Park, Bulgaria

The first of a series of illegal developments in Bulgaria

The Bansko Ski Zone was among the first of what has now become a series of ski developments in Bulgarian protected areas constructed in violation of law. The project, which extends into Pirin National Park, received approval from authorities in 2000 and was built in subsequent years. Half of the ski runs in Bansko have no environmental permits, while those ski runs which do have permits have violated each requirement of the Environmental Impact Assessment decision. These violations include for example: the permitted width of ski runs is 30 m, while in reality they are 60 to 100 m wide; only manual work was permitted on terrain, without using heavy machinery, while in reality bulldozers were used; no increase was permitted in the number of beds in the town of Bansko, while in reality the number of hotel beds has increased from 3,000 in 2002 to 15,000 in 2007. Indeed, construction permits for hotels and apartments in the valley have already been issued for a total of 200,000 beds.

The development has caused significant environmental problems, including landslides in Pirin National Park, but has also had social and economic implications as well. Bansko was once a popular summer resort, but visitor numbers have dropped in recent years due to higher prices and over-development of the once picturesque town.

Perhaps the worst effect however is the message this case has given to Bulgarian society that laws can be bypassed by anyone with sufficient funds and influence. This message has a demoralising effect on investors and the public alike. Indeed, the European Commission has repeatedly called on the Bulgarian government to take effective measures to tackle corruption.

The example of Bansko has inspired numerous other ski resort projects in Bulgaria. Some of them have already started their implementation and demonstrated the same disregard for law. The epidemic nature of the problem is seen again in Pirin National Park where its advisory body, the Consultative Council, submitted to the Ministry of the Environment a proposal to alter the park management plan in order to permit the construction of two huge new ski zones inside the park.

Further information: <http://www.forthenature.org>

Case study: Vitosha Nature Park, Bulgaria

The latest in a series of illegal developments in Bulgaria

Located at the edge of the Bulgarian capital Sofia, Vitosha is the oldest and one of the most popular nature parks on the Balkan Peninsula. Today, it is also included in the EU's Natura 2000 network of protected areas as it meets criteria of both nature directives - for birds as well as for species and habitats. The park has a management plan in force until 2014 which does not permit construction of new ski runs and facilities but only refurbishment of existing ski facilities.



Between October and November 2008 in the area of the Aleko tourist zone, heavy construction machines worked every day to destroy rock rivers and vegetation over an area of 18 dka. The actions were organized by Vitosha Ski, the company which owns the ski facilities but not the land. The purpose was to build a ski road and 'clean up' an existing ski run. The excavation works are in violation of four Bulgarian laws – the Protected Areas Act, the Spatial Planning Act, the Forests Act and the Biodiversity Act, as well as the Management Plan for Vitosha Nature Park. EU legislation has also been violated, as the excavation works have not been subject to appropriate assessment as required by Article 6 of the EU Habitats Directive.



The illegal works continued with no action taken by authorities to stop them, and despite formal protests by NGOs and coverage of the case by national and local media.

Meanwhile, authorities have given Vitosha Ski a green light to develop a spatial plan for the Aleko Tourist and Ski Centre, which envisages new ski runs and facilities in Vitosha, and to start procedures for Strategic Environmental Assessment (SEA) and appropriate assessment (AA) for the works. This happened despite

the fact that this spatial plan cannot be permitted in the first place as it contradicts the park's management plan. The spatial plan foresees a tripling of the ski runs and paths and related infrastructure; a doubling of the ski lifts, and construction of a 70.000 m³ lake for producing artificial snow (equal to 35 Olympic-size swimming pools). The ski zone reaches up to 1.800 m a.s.l. Given the climatic specifics of the mountain and global warming, the longer-term economic viability of this ski zone is questionable.

Vitosha Ski Company also organized a “public consultation” for the Strategic Environmental Assessment and Appropriate Assessment reports. The consultation process itself was made extremely difficult for interested people because the reports were provided for public consultation at a ski lift station located approximately 2 hours from the city. Only an electronic copy was available, with no signatures or other proof that these were the final versions of the reports. There were also many other procedural violations in the consultation process.

The reports themselves have a number of serious inadequacies. For example, individual species are not included; fauna are not covered in terms of impacts in the SEA report; and no alternatives are considered.

Worth noting is the fact that the company Vitosha Ski is related to a company which holds the concession for the Bansko Ski Zone in Pirin National Park, where the ski zone has already been constructed with a huge number of legal violations. According to media reports, behind both companies is First Investment Bank, one of the largest banks in Bulgaria. A prominent shareholder of the bank is the chairperson of the Bulgarian Ski Federation.



In contrast to many other nature conservation cases in Bulgaria, the Vitosha case has had difficulty breaking into the media. The First Investment Bank, which is behind the project, is one of the largest media advertisers in the country. Journalists have stated, unofficially, that their coverage of the case has been squelched by editorial pressure.

This has not stopped growing public attention and concern. By early December, more than 7,000 people have signed a petition calling on authorities to stop processing of the new ski zone plan. Position papers have been submitted by a number of organizations, including the ‘For the Nature Coalition’ comprising 30 nature conservation organisations, all of them insisting that authorities reject the SEA and AA reports.

Further information: <http://www.forthenature.org>

Photos of construction work at Vitosha Nature Park: © www.forthenature.org

Case study: **Rila National Park, Bulgaria**

Rila National Park is one of Bulgaria's most iconic nature areas, famous for the Seven Rila Lakes among other features. The area is one of three national parks in Bulgaria (IUCN category II) and part of the EU's Natura 2000 network of specially protected sites. It is also one of only nine European protected areas that have been certified by PAN Parks for management quality in protected areas.



This has not stopped developers from building a ski lift and road near the Seven Rila Lakes. Construction began in the summer of 2007 in breach of a number of legal requirements. To begin with, the lift has been constructed without a concession agreement, which is necessary for territories that are exclusive public property as in the case of the national park. Also missing is an up-to-date Environmental Impact Assessment – the investor quotes a 9-year old assessment, which expired four years ago.



Similarly, the road has been built without an Environmental Impact Assessment, either new or expired. The agreement has been to reconstruct the road within its old range. However, at some points the road is now double its original size and enters the park territory.

Both the ski lift and the road projects still need to be assessed according to Article 6 of the EU Habitats Directive regarding their impact on the Natura 2000 sites.

In spite of the above problems, construction is moving forward on both projects.

Apart from a fine imposed on the developer and local mayor – which was later successfully appealed in court -- the relevant authorities have done nothing to stop the developments.

The area around Rila National Park, which is a proposed Site of Community Importance (Rila Buffer, BG0001188), is the only habitat site from the country's list of Natura 2000 sites that the Bulgarian government has discarded.

Meanwhile, the Bulgarian Minister of Environment said in Parliament that his Ministry would not stop the construction due to high public interest and support for the lift and road.



The Minister's impression is contradicted by the results of a national representative opinion poll conducted by Alpha Research in August-September 2008 which revealed that 71.4% of all Bulgarians are concerned over the construction of new infrastructure, hotels, ski pistes and lifts in the protected areas of Bulgaria.



In fact, grassroots opposition to the project is growing. Thousands of people have joined street protests in Sofia. A grassroots group, *Citizens for Rila*, collected more than 150,000 signatures in support of Rila (a remarkable feat in a former Communist country with a poor tradition of public engagement) and submitted them to the European Parliament. Bulgarian NGOs have submitted an official complaint to the European Commission for contravening

EU nature directives.

Further information: <http://www.forthenature.org>

Photos of Rila Seven Lakes, construction work and street protests in Sofia: © www.forthenature.org



Source: www.corpwatch.org, 2007

Ski resorts in and near Rila National Park, Bulgaria

Project name:	Ski centre “Kartala”
Location (community, county):	Region/District Blagoevgrad, Municipality Blagoevgrad
Other ski facilities within a 60 km radius? (name, distance)	N/A (from Blagoevgrad to Bansko – 56 km; from Blagoevgrad to Kartala – 29 km)
Altitude (m above sea level):	Existing: from 1,430 m to 1,800 m Planned: from 1,438 m to 2,238
Project description	
<ul style="list-style-type: none"> Number of ski lifts: 	<p>Existing: 2</p> <p>Ski-tow type „Pomagalski” with a capacity of 900 people/hour and 1,500 m length;</p> <p>Ski-tow for beginners (educational) with a capacity of 500 people/hour and 300 m length.</p> <p>Planned: 2</p> <p>First lift: cabin, for 6 people, with a capacity of 1,300 people/hour, speed of cabins 4.0 m/s, 2,900 m length and 800 m elevation. The upper lift station will be situated at an elevation of 2,238.40 m, on an area of 620 m². The lower (initial) lift station will be situated at an elevation of 1,438.40 m, on an area of 620 m². The lift will be with power 650 kW. The lift will be hung on 23 posts.</p> <p>Second lift: Chairlift, with 4 seats, with a capacity of 2,600 people/hour, speed of cabins 4.0 m/s, 1,316 m length and 220 m elevation. The lower (initial) lift station will be situated at an elevation of 2,000 m on an area of 219 m². The upper lift station will be situated at an elevation of 2,220 m on an area of 227 m². The lift will be with power 508 kW. The lift will be hung on 17 posts.</p>
<ul style="list-style-type: none"> Number of ski runs: 	<p>Existing: 1</p> <p>Planned: Extension of the existing ski run with about 2,000 m</p>
<ul style="list-style-type: none"> Length of ski runs (km): 	<p>Existing: 2,200 m</p> <p>Planned: 4,172 m</p>
<ul style="list-style-type: none"> Number of skiers/year: 	<p>In the Ski centre “Kartala”:</p> <p>Existing: 800/day (tourist without bed base); 1,200/day (maximum 1.5x number of skiers) at the weekend</p> <p>Planned: 1,120/day (70% of 1600 beds); 1,680/day (maximum 1.5x number of skiers) at the weekend</p> <p>On the ski runs:</p> <p>Minimum: Existing – 370/hour; Planned – 1,118/hour</p> <p>Maximum: Existing – 412/hour; Planned – 1,370/hour</p>

<ul style="list-style-type: none"> Number of beds/accommodations: 	<p>Existing: In the resort "Bodrost" there are about 700 beds and 80 beds in two tourist chalets.</p> <p>Planned: Ski centre "Kartala" – 1,600 beds in three 3-6 floor hotels, on an area of 7,000 m². The ski centre "Kartala" will also have a possibility to intake about 400 tourists without overnight stays. Parking areas nearby to lower (initial) lift station with maximum capacity of 175 car places.</p>
<ul style="list-style-type: none"> Number of overnight stays/year: 	N/A
<ul style="list-style-type: none"> Number of snow cannon 	<p>Existing: N/A</p> <p>Planned: N/A</p>
Investment	
<ul style="list-style-type: none"> Projected completion 	The project for the construction of lifts is almost completed
<ul style="list-style-type: none"> Value of investment (local currency and €) 	N/A
<ul style="list-style-type: none"> Investor/s 	Prima Invest BG LTD / Municipality Blagoevgrad – 7,3 %
<ul style="list-style-type: none"> Project executant/s (e.g. construction and supply companies) 	Prima Invest BG LTD
<ul style="list-style-type: none"> Involvement/support of national, regional, local authorities: 	The project was just announced in the adopted in 2004 Programme for the development of tourism in the Municipality of Blagoevgrad for the period 2004-07 and the Plan for the Development of the Municipality of Blagoevgrad for the period 2007-2013, which was updated in 2008.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	<p>A smaller portion of the territory will be destroyed during the construction of ski runs, facilities and additional infrastructure. Another part will be damaged due to unregulated skiing, snowboarding and sledding (including motor sleds) in the winter. All of the territory will be subjected to considerable impact by intensive human activity during the whole year, leading to negative consequences such as wear, pollution, disturbance, cutting and plucking of plants, destruction, which ultimately will cause the deterioration in the quality of the habitats. Creation of new settlements will decrease the quantity of unfragmented habitats in the territory, and this will have a significant negative impact on wildlife.</p>
Located in a protected area and/or Natura 2000 site?	<p>The project is situated in the pSCI "Rila-buffer" BG0001188, which has still not been adopted as an official Natura 2000 site.</p> <p>The project facilities are situated in the immediate proximity to Rila National Park (completely coinciding with pSCI "Rila" BG0000495) – The upper lift station of the first lift is situated ca 100 m from the border of Rila National Park.</p> <p>The project facilities are in the proximity of Parangalitsa Reserve – ca 1,500-2,000 m.</p>
Environmental assessments/approvals	The project is subject to an obligatory EIA, according to Annex 1 to Item 1 of Article 92 of Environmental Protection Act (EPA), point 37, b) Tourism and recreation – ski runs, ski tows, rope lifts with total lengths of more than

(e.g. EIA, other)	<p>1,000 m and with facilities.</p> <p>The EIA procedure for the project for a cabin lift has begun but has not yet been finalised. Despite this, the project is already being implemented in 2007-08. The ski run is being extended without any building permission nor any Environmental Impact Assessment.</p>
Other issues/comments:	<p>A Detailed Spatial Plan (DSP) of a cabin lift and ski run adopted in 1996 by the Municipality of Blagoevgrad. The project for the lifts was approved by the Municipality Blagoevgrad in 2006 and already realized without accomplished Environmental Impact Assessment (EIA) procedure; ski run constructed without building permit and EIA.</p>
Author	Vasil Sandov Petrov
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Sources consulted:	<ul style="list-style-type: none"> • Detailed Spatial Plan(DSP) of a cabin lift and ski run adopted in 1996 by Municipality Blagoevgrad; • Programme for the development of tourism in Municipality Blagoevgrad for the period 2004-2007; • Plan for the development of Municipality Blagoevgrad for the period 2007-2013; • Report for the EIA of Development Proposals for the “Construction of passenger rope lifts on an existing glade towards ski run “Bodrost” and the constructed facilities towards it in county “Kartala”, area of Bistritsa village, Municipality of Blagoevgrad”.

Project name:	Winter tourism and sporting complex “Dolna banya – Ibar peak”
Location (community, county):	Region/District Sofia, Municipality Dolna banya
Other ski facilities within a 60 km radius? (name, distance)	Borovets, 21 km Yundola, 57km
Altitude (m above sea level):	Planned: from 850 m (chalet “Gerginitsa”) to 2,660 m (Ibar Peak)
Project description	
▪ Number of ski lifts:	Planned: N/A
▪ Number of ski runs:	Planned: N/A
▪ Length of ski runs (km):	Planned: The project plan the construction of ski runs and ski places that will be situated to the south of Ibar peak. The ski runs are planned for the Olympic Winter Games and World Ski Championships. The project also foresees the construction of ski runs for snowboarding, wild skiing, area for ski schools, summer sledges, extreme sports, etc.
▪ Number of skiers/year:	Planned: 5,000 beds planned in first stage of the project, with a total of 7,000 beds expected by the end of the project
▪ Number of beds/accommodations :	Existing: 200 beds in resort “Dolna banya” and ca 300 places for feeding. Planned: 7,000 beds. A part of these accommodations will be located at the “Dolna banya” resort.
▪ Number of overnight stays/year:	N/A
▪ Number of snow cannon	N/A
Investment	
▪ Projected completion	At this stage the project is still at the concept stage.
▪ Value of investment ▪ (local currency and €)	N/A
▪ Investor/s	Possible: Group of local and other Bulgarian investors jointly with Municipality Dolna banya.
▪ Project executant/s (e.g. construction and supply companies)	N/A
▪ Involvement/support of national, regional, local authorities:	The project was announced in the 2006 Strategy for the Development of Tourism in the Municipality of Dolna banya for the period 2007-13 and the Strategy for the Development of the Municipality of Dolna banya for the period 2007-2013.

Impacts	
Potential environmental risks/concerns (please be as specific as possible)	A smaller portion of the territory will be destroyed during the construction of ski runs, facilities and additional infrastructure. Another part will be damaged due to unregulated skiing, snowboarding and sledding (including motor sleds) in the winter. All of the territory will be subjected to considerable impacts from intensive human activity during the whole year, leading to negative impacts such as wear, pollution, disturbance, cutting and plucking of plants, destruction, which ultimately will cause the deterioration of the quality of the habitats. Creation of new settlements will decrease the quantity of unfragmented habitats in the territory, and this will have a significant negative impact on wildlife.
Located in a protected area and/or Natura 2000 site?	The larger part of the project is situated within Rila National Park (totally coinciding with pSCI "Rila" BG0000495) and some of the project facilities are situated in the Ibar Reserve or in its immediate proximity. A smaller part of the project is situated in the pSCI "Rila-buffer" BG0001188, which has still not been adopted as an official Natura 2000 site.
Environmental assessments/approvals (e.g. EIA, other)	The project is subject to an obligatory Assessment of Compatibility, which must be carried out together with an Environmental Impact Assessment according to Article 4 of the Regulation on the Terms and Conditions for carrying out Assessment of Compatibility (AC) of Plans, Programs, Projects and Development Proposals with the subject and purposes of conservation of Special Areas of Conservation (SAC). The Detailed Spatial Plan (DSP) of the winter tourist and sporting complex "Dolna banya – Ibar peak" is subject to an obligatory Environmental Impact Assessment according to Annex 1 and Article 2 (1) of the Regulation on the Conditions, Procedure and Methods for Environmental Assessment (EA) of Plans and Programs, point 11.1. The Development Proposals for construction of the ski runs and facilities are subject to an obligatory EIA, according to Annex 1 to Item 1 of Article 92 of Environmental Protection Act (EPA), point 37, b) Tourism and recreation – ski runs, ski tows, rope lifts with total lengths of more than 1,000 m and with facilities.
Other issues/comments:	This project is part of a larger project whose activities and facilities situated on the territory of three Municipalities – Dolna banya, Kostenets and Belovo. The project was divided into 2 parts and the part of the project located in the Municipality of Belovo has been excluded.
Author	Vasil Sandov Petrov
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Sources consulted:	<ul style="list-style-type: none"> • Strategy for the development of tourism in Municipality Dolna bania for the period 2007-2013; • Strategy for the development of Municipality Dolna bania for the period 2007-2013.

Project name:	Winter tourist and sporting complex “Kostenets – Belmeken”
Location (community, county):	Region/District Sofia, Municipality Kostenets
Other ski facilities within a 60 km radius? (name, distance)	Borovets, 36 km Yundola, 51 km
Altitude (m above sea level):	Planned: from 1,120 m to 2,600 m (peak Belmeken) or 2,350 m (Sokolov peak)
Project description	
▪ Number of ski lifts:	Planned: at least 4 ski lifts, a cabin lift and 3 chairlifts.
▪ Number of ski runs:	Planned: N/A
▪ Length of ski runs (km):	Planned: The construction of ski runs and ski places that will be situated to the north of Belmeken peak, Sokolov peak and around Plevnyata peak. The ski runs are planned to cater to the Olympic Winter Games and the World Ski Championship. The project also calls for construction of ski runs to biathlon, snowboard, wild ski, zones for ski schools, summer sledges, extreme sports, etc.
▪ Number of skiers/year:	Planned: N/A
▪ Number of beds/accommodations :	Existing: 656 in chalet “Gurgulitsa” and “Villas Kostenets” and ca 860 places for eating. Planned: 16,000 beds. A part of them will be located in the counties of “Milikini nivi” and “Villas Kostenets”. This is the optimal number of beds for only the first stage of the resort’s development.
▪ Number of overnight stays/year:	N/A
▪ Number of snow cannon	The project plans for the production of artificial snow.
Investment:	
▪ Projected completion	At this stage the project is still at the concept stage.
▪ Value of investment ▪ (local currency and €)	N/A
▪ Investor/s	Possible: Group of local and other Bulgarian investors jointly with Municipality Kostenets.
▪ Project executant/s (e.g. construction and supply companies)	N/A
▪ Involvement/support of national, regional,	The project was announced in the 2006 Strategy for the Development of Tourism in the Municipality of Kostenets for the period 2007-13 and the Plan

local authorities:	for the Development of the Municipality of Kostenets for the period 2007-2013.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	A smaller portion of the territory will be destroyed during the construction of ski runs, facilities and additional infrastructure. Another part will be damaged due to unregulated skiing, snowboarding and sledding (including motor sleds) in the winter. All of the territory will be subjected to considerable impacts by intensive human activity during the entire year, leading to possible negative consequences such as wear, pollution, disturbance, cutting and plucking of plants, destruction, which ultimately will cause to deterioration of the quality of the habitats. Creation of new settlements will decrease the quantity of unfragmented habitats in the territory, and this will have a significant negative impact on wildlife.
Located in a protected area and/or Natura 2000 site?	The larger part of project is situated in Rila National Park (completely coinciding with the pSCI "Rila" BG0000495) and some of the projects facilities are situated in the immediate proximity of the Ibar Reserve. A smaller part of the project is situated in the pSCI "Rila-buffer" BG0001188, which has still not been adopted as an official Natura 2000 site.
Environmental assessments/approvals (e.g. EIA, other)	The project is subject to an obligatory Assessment of Compatibility, which must be carried out together with an Environmental Impact Assessment according to Article 4 of the Regulation on the Terms and Conditions for carrying out Assessment of Compatibility (AC) of Plans, Programs, Projects and Development Proposals with the subject and purposes of conservation of Special Areas of Conservation (SAC). The Detailed Spatial Plan (DSP) of the winter tourist and sporting complex "Dolna banya – Ibar peak" is subject to an obligatory Environmental Impact Assessment according to Annex 1 and Article 2 (1) of the Regulation on the Conditions, Procedure and Methods for Environmental Assessment (EA) of Plans and Programs, point 11.1. The Development Proposals for construction of the ski runs and require an EIA, according to Annex 1 to Item 1 of Article 92 of the Environmental Protection Act (EPA), point 37, b) Tourism and recreation – ski runs, ski tows, rope lifts with total lengths of more than 1,000 m and with facilities.
Other issues/comments:	This is part of a larger project whose activities and facilities situated on the territory of three Municipalities – Dolna banya, Kostenets and Belovo. The project was divided into 2 parts and the part of the project located in the Municipality of Belovo has been excluded.
Author	Vasil Sandov Petrov
Email, Telephone	v_sandov@yahoo.com
Sources consulted:	<ul style="list-style-type: none"> • Strategy for the Development of Tourism in the Municipality of Kostenets for the period 2007-2013; • Plan for the Development of the Municipality of Kostenets for the period 2007-13.

Project name:	Ski resort “Treshtenik”
Location:	Region/District Blagoevrag, Municipality Yakoruda
Other ski facilities within a 60 km radius?	Bansko, 47 km; Semkovo, 47 km; Yundola 25 km
Altitude (m above sea level):	Planned: from 1,680 m to 2,010 m
Project description	
▪ Number of ski lifts:	Planned: 1 2-person chairlift, with a capacity of 800 people/hour, 1,570 m length and 330 m in elevation. The lower (initial) lift station will be situated at an elevation of 1,680 m, on an area of 250-300 m ² . The upper lift station will be situated on an elevation of 2010 m. The lift will be with power c 110 kW. The lift will be hung on 13 posts.
▪ Number of ski runs:	Planned: 1
▪ Length of ski runs (km):	Planned: 1,820 m
▪ Number of skiers/year:	In the Ski resort “Treshtenik”: Minimum: Planned: 152/day (70% of 218 beds); 228/day (max 1.5 x number of skiers) at the weekend. Maximum: Planned: 560/day (70% of 800 beds); 840/day (max 1.5x number of skiers) at the weekend. On the ski run: Minimum: Planned – 310/hour Maximum: Planned – 384/hour
▪ Number of beds/accommodations :	Existing: In the resort “Treshtenik” there are 218 beds. Planned: Maximum of 800 beds. Parking areas are not planned near the lower (initial) lift station. Instead, cars will park at the hotels parking.
▪ Number of overnight stays/year:	N/A
▪ Number of snow cannon	N/A
Investment:	
▪ Projected completion	Construction began in 2007 but has not yet been completed.
▪ Value of investment ▪ (local currency and €)	N/A
▪ Investor/s	Kareks-2003 JSC
▪ Project executant/s (e.g. construction and	Kareks-2003 JSC. N/A for other executants.

supply companies)	
<ul style="list-style-type: none"> ▪ Involvement/support of national, regional, local authorities: 	The project was announced in the adopted 2006 Plan for the Development of the Municipality of Yakoruda for the period 2007-2013.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	A smaller portion of the territory will be destroyed during the construction of ski runs, facilities and additional infrastructure. Another part will be damaged due to unregulated skiing, snowboarding and sledding (including motor sleds) in the winter. All of the territory will be subjected to considerable impact by intensive human activity during the whole year, leading to all possible negative consequences such as wear, pollution, disturbance, cutting and plucking of plants, destruction, which ultimately will cause deterioration in the quality of the habitats.
Located in a protected area and/or Natura 2000 site?	<p>The project is situated in pSCI "Rila-buffer" BG0001188, which has still not been adopted as an official Natura 2000 site.</p> <p>The projects facilities are situated near Rila National Park (totally coinciding with pSCI "Rila" BG0000495) – the upper lift station of the first lift is situated ca 100-200 m from the border of Rila National Park.</p>
Environmental assessments/approvals (e.g. EIA, other)	<p>The Development Proposals for the "Construction of Ski Run and Passenger Rope Lifts in Treshtenik County" is subject to an obligatory Environmental Impact Assessment according to Annex 1 to Item 1 of Article 92 of Environmental Protection Act (EPA), point 37, b) Tourism and Recreation – ski runs, ski tows, rope lifts with total lengths of more than 1,000 m and with facilities.</p> <p>The EIA of the Development Proposals was adopted by the Ministry of Environment and Waters (MOEW) in 2006 (Resolution No. 11-6/2006).</p>
Other issues/comments:	A Detailed Spatial Plan (DSP) of a ski run and a cabin lift adopted and authorized by the Municipality of Yakoruda in 2006. Construction activities started in 2007.
Author	Vasil Sandov Petrov
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Sources consulted:	<ul style="list-style-type: none"> • Plan for the development of Municipality Yakoruda for the period 2007-2013; • Report for the EIA of the Development Proposals for the "Construction of ski run and passenger rope lifts in "Treshtenik" County, Municipality Yakoruda".

Project name:	“Samokov-Borovets-Beli Iskar”
Location (community, county):	Municipality of Samokov
Other ski facilities within a 60 km radius? (name, distance)	“Panichishte-the Lakes-Kabul peak”, “Iskrovete”, “Kartala”, “, 4 “4,
Altitude (m above sea level):	1,300 – 2,400 m a.s.l.
Project description	
▪ Number of ski lifts:	30
▪ Number of ski runs:	33
▪ Length of ski runs (km):	100
▪ Number of skiers/year:	10,000 (100 days per year)
▪ Number of beds/accommodations:	25,000
▪ Number of overnight stays/year:	2,500,000 (100 days per year)
▪ Number of snow cannon	-
Investment:	
▪ Projected completion	-
▪ Value of investment ▪ (local currency and €)	700 million Lev or €350 million
▪ Investor/s	“Rila Samokov 2004” owned by the Investment fund “Equest”, the Municipality of Samokov (25%) and the construction company “GlavBolgarStroy” JSC (8%)
▪ Project executant/s (e.g. construction and supply companies)	“GlavBolgarStroy” JSC
▪ Involvement/support of national, regional, local authorities:	The Municipality of Samokov - Development plan of the Municipality of Samokov 2007-2013
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	The implementation of the ski resort project would lead to the destruction of the following habitats included in Annex 1 of the EU Habitats Directive: 4060, *4070, 62D0, 6430, 6520, 9110, 9130, 91BA, 91CA, 9410, 8230. Also affected would be the habitats of Annex 2 species such as the *Brown

	bear, *European wolf and Balkan chamois as well as the habitats of species protected by the Birds Directive such as the Balkan Grouse (<i>Capercaillie Tetrao urogallus</i>); Pigmy Owl (<i>Glacidium passerinum</i>); Tengmalm's Owl (<i>Aegolius funereus</i>), etc. The project would destroy migration biocorridors to the adjacent Natura 2000 sites and would lead to the isolation of the populations of the abovementioned mammals.
Located in a protected area and/or Natura 2000 site?	"Rila" SPA (BG0002055), "Rila Buffer" pSCI (BG0001188)
Environmental assessments/approvals (e.g. EIA, other)	<p>The Strategic Environmental Assessment (SEA) of the project was adopted in 2005. No assessment has been carried out of the impacts, including cumulative ones, on habitats and species from Annex 1 and 2 of the Habitats Directive (in "Rila-buffer" pSCI) and Annex 1 and 2 of the Birds Directive (in "Rila" IBA/proposed SPA).</p> <p>The construction of the cabin lift Borovets-Markudzhitsi began without completion of a full Environmental Impact Assessment.</p>
Other issues/comments:	
Author	Alexander Dountchev
Email, telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> • Media reports (http://www.dnevnik.bg/show/?storyid=370129 , etc.) • A map of the General Spatial Plan (GSP) of the ski resort • SEA of the General Spatial Plan.

Project name:	“Iskrovete - Govedartsi- Maljovitsha”
Location (community, county):	Municipality of Samokov
Other ski facilities within a 60 km radius? (name, distance)	“Panichishte-the Lakes-Kabul peak”, “Borovets”, “Semkovo”;
Altitude (m above sea level):	1,300 – 2,000 m a.s.l.
Project description	
▪ Number of ski lifts:	13
▪ Number of ski runs:	20
▪ Length of ski runs (km):	38
▪ Number of skiers/year:	10,000 (100 days per year)
▪ Number of beds/accommodations:	3,000
▪ Number of overnight stays/year:	300,000 (100 days per year)
▪ Number of snow cannon	-
Investment	
▪ Projected completion	-
▪ Value of investment ▪ (local currency and €)	300 million Lev (€150 million)
▪ Investor/s	Nadar 2006 owned by the Bulgarian company “El Em Impex”, Ltd
▪ Project executant/s (e.g. construction and supply companies)	-
▪ Involvement/support of national, regional, local authorities:	The Municipality of Samokov - Development Plan of the Municipality of Samokov 2007-2013
Impacts	
Potential environmental risks/concerns (please be	The implementation of the ski resort project would lead to the destruction of 587.4 ha of the following habitats included in Annex 1 of the EU Habitats Directive: 4060, *4070, 62D0, 6430, 6520, 9110, 9130, 91BA, 91CA, 9410,

as specific as possible)	8230. Damaged would be habitats of Annex 2 species such as the *Brown bear, *European wolf and Balkan chamois as well as habitats of species protected by the Birds Directive such as Balkan Grouse (<i>Capercaillie Tetrao urogallus</i>); Pigmy Owl (<i>Glacidium passerinum</i>); Tengmalm's Owl (<i>Aegolius funereus</i>); etc. The project would destroy migration biocorridors to the adjacent Natura 2000 sites and would lead to the isolation of the populations of the above mentioned mammals.
Located in a protected area and/or Natura 2000 site?	"Rila" SPA (BG0002055), "Rila Buffer" pSCI (BG0001188)
Environmental assessments/approvals (e.g. EIA, other)	The Strategic Environmental Assessment (SEA) of the project is being currently undertaken.
Other issues/comments:	
Author	Alexander Dountchev
Email, Telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> Media reports, e.g. http://www.capital.bg/show.php?storyid=267460&show=0 Map of the Master Spatial Plan of the ski resort

Project name:	“Panichishte-the Lakes –Kabul Peak”
Location (community, county):	Municipality of Sapareva Bania
Other ski facilities within a 60 km radius? (name, distance)	“Malyovitsa”, “Borovets”, “Kartala”, “Treshtenik”
Altitude (m above sea level):	1,450 – 2,700 m a.s.l.
Project description	
▪ Number of ski lifts:	21
▪ Number of ski runs:	19
▪ Length of ski runs (km):	58
▪ Number of skiers/year:	3,320,000 (100 days per year)
▪ Number of beds/accommodations:	20,000
▪ Number of overnight stays/year:	4,000,000 (200 days per year)
▪ Number of snow cannon	-
Investment	
▪ Projected completion	2016
▪ Value of investment ▪ (local currency and €)	900 million Lev or €450 million
▪ Investor/s	Rila sport JSC (owned by the off-shore company Rilstone trading business corporation VGB)
▪ Project executant/s (e.g. construction and supply companies)	
▪ Involvement/support of national, regional, local authorities:	The Municipality of Sapareva Bania - Development program of the Municipality of Sapareva banya.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	The illegally started implementation of the ski resort project has already lead to destruction of the following habitats included in Annex 1 of the Habitats Directive: *4070, 4060, 95A0, 91BA, 91CA, 6150, 9410, 6430. Further damage is expected on 299 ha of the habitats 3220, 4060, *4070, 6150, 6230, 6430, 7110, 8110, 8230, 9410, 95A0. Already damaged and to be

	damaged are the habitats of Annex 2 priority species such as *Brown bear, *European wolf and the habitats of species protected by the Birds Directive such as Balkan Grouse, Capercaillie <i>Tetrao urogallus</i> , Pigmy Owl <i>Glacidium passerinum</i> , Tengmalm's Owl <i>Aegolius funereus</i> , Golden Eagle <i>Aquila chrysaetos</i> , etc.
Located in a protected area and/or Natura 2000 site?	Rila National Park, "Rila" pSCI (BG0000495), "Rila" SPA (BG0000495), "Rila Buffer" pSCI (BG0001188)
Environmental assessments/approvals (e.g. EIA, other)	The Strategic Environmental Assessment (SEA) of the project was rejected in 2006. Still, numerous ski resort objects (roads, ski runs, a lift, detailed spatial plan) have been authorized without any EIA.
Other issues/comments:	An official complaint regarding infringement of the European legislation in the region of Panichishte on Rila Mountain was sent to the European Commission on 21 May 2008 by the NGO Green Balkans Bulgaria.
Author	Alexander Dountchev
Email, Telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> • Press release of Rila Sport JSC (22 April 2008) • Map of the Master Spatial Plan of the ski resort • Official correspondence with the Ministry of Environment and Waters • Official complaint to the European Commission sent on 21 May 2008 by the Green Balkans Bulgaria.

Ski resorts in and around Pirin National Park, Bulgaria

Project name:	Bansko ski zone, including its recent additions: <ul style="list-style-type: none"> – Construction of a four-seat lift in the area of Chalin Valog – Project for the construction of infrastructure for the passage of a ski run through heights 1,185-1,190 m in the Bansko ski zone – A new cabin lift from Bansko to the ski zone Modification of the General Zoning Plan (GZP) of ski zone Bansko – construction of three drag-lifts with lengths of 300 m, 300 m and 150 m.
Location (community, county):	Bansko, population 13,726
Other ski facilities within a 60 km radius? (name, distance)	Dobrinishte and Kulinoto Ski Zones
Altitude (m above sea level):	Between 950 m and 2,650 m
Project description	
▪ Number of ski lifts:	12
▪ Number of ski runs:	14
▪ Length of ski runs (km):	70 km ski runs and 60 km ski roads
▪ Number of skiers/year:	99,740 daily cards for the ski facilities sold in the 2007/08 season
▪ Number of beds/accommodations:	12,000 beds in 2007 (8,000 in 2005) – according to the Municipality of Bansko Planned 200,000 beds in the municipalities of Bansko and Razlog – according to the Bulgarian press (Dnevnik)
▪ Number of overnight stays/year:	250,000 visitors of the resort in 2007/08
▪ Number of snow cannons	75
Investment	
▪ Projected completion	Ongoing
▪ Value of investment ▪ (local currency and €)	> €40 million
▪ Investor/s	Yulen Shareholding, (60% belongs to OOD Marengo Trading – Cyper, 30% to T.A.S. Services, and 8% to Bansko Municipality)

<ul style="list-style-type: none"> Project executant/s (e.g. construction and supply companies) 	Yulen Shareholding; Balkanstroy AD
<ul style="list-style-type: none"> Involvement/support of national, regional, local authorities: 	Bansko Municipality has 8% of the project.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	<p>The ski zone penetrates deep into the core areas of the National Park and between two large strict reserves, which has led to the destruction of habitats and their quality, wildlife avoidance, invasion of alien plants, various types of pollution as well as poaching and illegal logging.</p> <p>The severely impacted habitats are:</p> <ul style="list-style-type: none"> Alpine and Boreal heaths, Bushes with <i>Pinus mugo</i> and <i>Rhododendron hirsutum</i>, Species-rich <i>Nardus</i> grasslands, Rhodope spruce forest, <i>Pinus peuce</i> woods (High oro-Mediterranean pine forests). The severely impacted species are: the Brown bear, the Balkan chamois, the Honey Buzzard, the Golden Eagle, the Lesser Spotted Eagle, the Peregrine Falcon, the Hazel Grouse, the Capercaillie, the Boreal Owl / Tengmalm's Owl, the Black Woodpecker, the White-backed Woodpecker, the Three-toed Woodpecker. Erosion is also widely spread on several pistes in the resort, and on the nearby slopes.
Located in a protected area and/or Natura 2000 site?	<ul style="list-style-type: none"> Pirin National Park (IUCN II category) pSCI and SPA "Pirin" BG0000209 (Natura 2000) The site is also declared a UNESCO World Natural Heritage Site.
Environmental assessments/approvals (e.g. EIA, other)	<p>Within the period 2000–02, the Minister of Environment and Waters issued the following EIA decisions related to the overall construction of the resort and its separate components:</p> <ul style="list-style-type: none"> EIA 57-13/2000 on Territorial and Management Plan of Bansko Ski Zone; EIA 35-11/2001 on "Children's Ski Slope and Cable-Way"; EIA 36-11/2001 on "Platoto Cable-Way and Ski Slope"; EIA 37-11/2001 on "Chair Cable-Way Shiligarnika–Platoto and Ski Slope Platoto-Shiligarnika"; EIA 38-11/2001 on "Cable-Way Balkaniada"; EIA 39-11/2001 on "Extension of Stara Pista Ski Slope"; EIA X-7/2002 on "Bunderishka Polyana–Shiligarnika Ski Slope and Cable-Way"; EIA Decision XI-7/2002 on "Bansko–Bunderishka Polyana Cabin Cable-Way"; EIA Decision on "Bunderishka Polyana–Todorka Peak Ski Slope and Cable-Way"; <p>All acts listed above violate the Pirin National Park Management Project from 1994, the Protected Areas Act, UNESCO, the Bern Convention and others</p> <p>The project Chalin valog has been granted approval with Decision №22</p>

	<p>from 15.12.2007 of the Ministry of the Environment and Waters in Bulgaria, according to which no EIA was needed. No procedures under Article 6 of the Habitat Directive have been carried out. The project in question was realized before 15 December 2007.</p> <p>Modification of the General Zoning Plan (GZP)</p> <p>On December 19th, 2007 with Decision N 44, the Municipality Council of Bansko changes the GZP of Bansko Ski Zone, and the construction of three drag lifts was authorized. They all fall within the territory of the site "Pirin" BG0000209 (Natura 2000). The decision of the municipal council was accepted in violation with the procedures in the Strategic Environmental Assessment (SEA) Directive, Article 31 of the Biodiversity Act and Article 6 of the Habitats Directive.</p> <p>The following significant construction works have been undertaken in violation of the law, without EIAs:</p> <ul style="list-style-type: none"> • Construction site and temporary buildings at the Bunderishka meadow and in the area of Shiligarnika, the base station of the Zhelezni Most–Platoto cabin cable-way and upper station of the Bunderishka Polyana cable-way; • The Strazhite (Zhelezni Most–Platoto), Shiligarnik 1 and 2, Plato 1, Bunderitsa ski pistes, and their side legs; • The Bansko - Bunderishka Polyana and Shiligarnika–Chalin Valog ski roads and two others with a total length of 16 km; • The following ski facilities: Zhelezni Most–Platoto, Plato–Sever and 10 children cable-ways; two additional cable-ways crossing and connecting Bunderishka Polyana with crossing points 6, 7 and 9; • A lake at Bunderishka meadow and two water catchments at the Bunderishka and Demianitsa rivers.
Other issues/comments:	<p>Five large-scale golf complexes are planned at the edge of Pirin National Park.</p> <p>The ski pistes in the resort are being constantly expanded and broadened. The monitoring of their construction has shown that logging has been taking place throughout the year.</p> <p>The concession which Yulen received was for 100 ha, while the total expansion and logging has taken place on a territory of 250 ha, all of which is located in a protected area.</p>
Author	Tsveta Hristova, Filka Sekulova
Email, Telephone	filka@aseed.net
Sources consulted:	<ul style="list-style-type: none"> • Documentation issued by the Ministry of the Environment and Water • Bansko Municipality – interviews • Yulen Shareholding – interviews and www.banskoski.com • http://www.bluelink.net/savepirin/en/skiproblem.shtml?AA_SL_Session=ba1914bd8c38aa5cf01f9246d25884fb&x=8262 • Save Pirin Coalition (2006), <i>Bansko Ski Zone - Crime Against: UNESCO site & potential NATURA 2000 site</i> • Bulgarian State Tourism Agency, <i>"Strategy for the Development of Bulgarian Tourism for the period 2006-2009"</i>

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| | <ul style="list-style-type: none">• http://capital.bg/show.php?storyid=386019• http://capital.bg/show.php?storyid=352097• http://capital.bg/show.php?storyid=28981 |
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Project name:	Project Dobrinishte Ski and Tourist Zone
Location (community, county):	Bansko Municipality, 13 726 citizens
Other ski facilities within a 60 km radius? (name, distance)	Bansko and Kulinoto
Altitude (m above sea level):	810 m – 2,600 m
Project description	
▪ Number of ski lifts:	4 ski lifts with a total length of 19 km
▪ Number of ski runs:	7
▪ Length of ski runs (km):	Total length of ski runs - 35 km, total length of ski trails - 36 km, total territory – 2,000 ha
▪ Number of skiers/year:	No forecasts available
▪ Number of beds/accommodations:	10,000 – 12,000
▪ Number of overnight stays/year:	5,000
▪ Number of snow cannons	> 50 (this is a forecast, no number is available yet)
Investment	
▪ Projected completion	Planning stage
▪ Value of investment ▪ (local currency and €)	260 million Leva (€130 million)
▪ Investor/s	Dobrinishte Ski – Shareholding, owned by Orbel Development shareholding and Bansko Municipality
▪ Project executant/s (e.g. construction and supply companies)	Project: "IVIS – Project and Design" LTD
▪ Involvement/support of national, regional, local authorities:	Bansko Municipality and the Bulgarian Investment Agency have declared their strong support for the project. The project has received a First Class Investment certificate.
Impact	
Potential environmental risks/concerns (please be as specific as possible)	The ski zone penetrates deep into the core areas of the National Park and near Yulen Reserve, which has lead to the direct destruction of habitats and their quality, wildlife avoidance, invasion of alien plants, various types of

	<p>pollution as well as poaching and illegal logging.</p> <p>The severely impacted habitats are:</p> <p>Alpine and Boreal heaths, Bushes with Pinus mugo and Rhododendron hirsutum, Species-rich Nardus grasslands, Rhodope spruce forest, Pinus peuce woods (High oro-Mediterranean pine forests).</p> <p>The severely impacted species are: the Brown bear, the Balkan chamois, the Honey Buzzard, the Golden Eagle, the Lesser Spotted Eagle, the Peregrine Falcon, the Hazel Grouse, the Capercaillie, the Boreal Owl / Tengmalm's Owl, the Black Woodpecker, the White-backed Woodpecker, the Three-toed Woodpecker. Erosion is also widespread on several pistes in the resort, and on the nearby slopes.</p>
Located in a protected area and/or Natura 2000 site?	<p>Pirin National Park (IUCN II category)</p> <p>SPA "Pirin" BG0000209 and pSCI "Pirin" BG0000209</p> <p>The site is also declared a world natural heritage site under the protection of UNESCO.</p>
Environmental assessments/approvals (e.g. EIA, other)	<p>No environmental evaluations or Environmental Impact Assessments have been undertaken. A preliminary General Zoning Plan of Dobrinishte Ski Zone and a General Zoning Plan of the town of Dobrinishte have been prepared.</p>
Other issues/comments:	
Author	Tsveta Hristova, Filka Sekulova
Email, Telephone	filka@aseed.net
Sources consulted:	<p>http://dobrinishte-bg.com/content/blogcategory/3/58/</p> <p>Dnevnik.bg, 22th october 2007</p> <p>http://www.stroitelstvo.info/show.php?storyid=408286</p> <p>http://capital.bg/show.php?storyid=386019</p> <p>http://capital.bg/show.php?storyid=352097</p> <p>http://capital.bg/show.php?storyid=289810</p> <p>http://www.dnevnik.bg/show/?storyid=329095</p> <p>http://www.panda.org/bg/news_facts/index.cfm?uNewsID=86500</p> <p>http://www.imoti.net/nd/news/news.php?id=2466</p> <p>http://www.aimoti.com/r.php?id=1155</p>

Project name:	“Kulinoto Ski and Golf complex”
Location (community, county):	Municipality of Razlog
Other ski facilities within a 60 km radius? (name, distance)	Bezbug (Dobrinishte), Bansko
Altitude (m above sea level):	Between 950 m and 1,400 meters
Project description	
▪ Number of ski lifts:	20 ski lifts, with a total length of 19.4 km
▪ Number of ski runs:	No information available at this stage
▪ Length of ski runs (km):	58.5 km, covering a total of 450 ha, 48% of which located in Pirin National Park
▪ Number of skiers/year:	Projected daily capacity is 6,500 people a day. Forecasts per year are difficult to make
▪ Number of beds/accommodations:	3,000 beds planned
▪ Number of overnight stays/year:	No forecasts
▪ Number of snow cannon	No planning for snow cannons
Investment:	
▪ Projected completion	Planning stage, Detailed Zoning Plan completed
▪ Value of investment ▪ (local currency and €)	240 million Leva (ca €120 million)
▪ Investor/s	Balkanstroy and the Municipality of Razlog
▪ Project executant/s (e.g. construction and supply companies)	Balkanstroy
▪ Involvement/support of national, regional, local authorities:	The Municipality of Razlog backs the project, which received a first class certificate by the Bulgarian Investment Agency
Impacts	
Potential environmental risks/concerns (please be	The project is planned very close to the “Bayuvi Dupki – Dzindziritsa” Biosphere Reserve. Its development would lead to the destruction of a large

as specific as possible)	number of natural habitats and habitats of priority species, which are one of the following: *4070, 4060, 5130, 8120, 8210, 91BA, 95A0, 9410, 9530 (as defined according to the European Habitats Directive, * <i>Ursus arctos</i> , * <i>Canis lupis</i> , etc.
Located in a protected area and/or Natura 2000 site?	48% of the planned 450 ha, dedicated for the project are located in Pirin National Park and Natura 2000 site of Pirin, which is also IUCN II category. The project is also located in SPA "Pirin" BG0000209 and pSCI "Pirin" BG0000209. The site is also a UNESCO World Natural Heritage Site.
Environmental assessments/approvals (e.g. EIA, other)	Detailed Zoning Plan (DZP) was adopted, while no Environmental Assessment for it has been developed.
Other issues/comments:	In granting the permission for carrying out the activities described in this letter, the Bulgarian authorities did not follow the procedure described in Article 6(3) of the Habitats Directive. The Bulgarian Ministry of Environment has stated that the implementation of the Kulinoto project can only take place if the Management Plan of Pirin National Park is revised and changed. At present, no new skiing facilities can be constructed in the National Park, according to the Bulgarian law.
Author	Tsveta Hristova, Filka Sekulova
Email, Telephone	filka@aseed.net
Sources consulted:	<ul style="list-style-type: none"> ▪ A letter to Environment Directorate-General, European Commission from GREEN BALKANS Federation of Nature Conservation NGOs about Infringement of article 6(3) of the Habitat Directive ▪ http://www.aimoti.com/r.php?id=510 ▪ Ministry of Environment and Waters – official correspondence ▪ http://www.bulgarianproperties.com/bg/Property_news/Detailed_Plan_of_Kulinoto_Ski_and_Golf_Complex_Approved_1966.html

Ski areas in Stara Planina area, Bulgaria

Project name:	Berkovitsa – “Kom-Berkovitsa”
Location (community, county):	Municipality of Berkovitsa
Other ski facilities within a 60 km radius? (name, distance)	
Altitude (m above sea level):	900 –1,940 m a.s.l.
Project description	
▪ Number of ski lifts:	8
▪ Number of ski runs:	8
▪ Length of ski runs (km):	13
▪ Number of skiers/year:	100,000 (100 days per year)
▪ Number of beds/accommodations:	4,500
▪ Number of overnight stays/year:	900,000 (200 days per year)
▪ Number of snow cannon	-
Investment	
▪ Projected completion	2016
▪ Value of investment (local currency and €)	100 million Lev or €50 million
▪ Investor/s	“Kom 2016” JSC (owned by “GlavBolgarStroy” JSC and the Municipality of Berkovitsa)
▪ Project executant/s (e.g. construction and supply companies)	“GlavBolgarStroy” JSC
▪ Involvement/support of national, regional, local authorities:	The Municipality of Berkovitsa

Impacts	
Potential environmental risks/concerns (please be as specific as possible)	The implementation of the ski resort project would lead to the destruction of 269 ha of the following habitats included in Annex 1 of the Habitats Directive: 4060, *4070, 6150, 62D0, 9110, 9130, 91BA, 9410, 9260, 91W0, 9170, 9150. Damaged would be the habitats of Annex 2 species such as *Brown bear, *European wolf and European lynx (50% of the localities where the species has been found in Western Stara Planina, which is 20% of the all localities in Bulgaria) as well as the habitats of species protected by the Birds Directive such as woodpeckers (<i>Dryocopus martius</i> , <i>Dendrocopos medius</i> , <i>Dendrocopos leucotos</i> , etc), owls (<i>Strix uralensis</i> , <i>Aegolius funereus</i>) eagles (<i>Aquila chrysaetos</i>), etc.
Located in a protected area and/or Natura 2000 site?	Proposed "Zapadna Stara Planina" Nature Park, "Zapadna Stara Planina i Predbalkan" pSCI (BG0001040), "Zapadni Balkani" SPA (BG0002002);
Environmental assessments/approvals (e.g. EIA, other)	A Strategic Environmental Assessment (SEA) is currently being done for the project.
Other issues/comments:	
Name of person filling out questionnaire	Alexander Dountchev
Email, Telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> Media reports (http://regionestates.com/index.php?p=stata&stataid=2 , etc.) A map of the Master Spatial Plan (MSP) of the ski resort

Project name:	“Tryvna”
Location (community, county):	Municipality of Tryavna (Stara Planina area)
Other ski facilities within a 60 km radius? (name, distance)	“Uzana”, “Ribaritsa”
Altitude (m above sea level):	860 – 1,430 m a.s.l.
Project description	
▪ Number of ski lifts:	5
▪ Number of ski runs:	4 ski runs and 7 ski areas.
▪ Length of ski runs (km):	5
▪ Number of skiers/year:	114,000 (30 days per year)
▪ Number of beds/accommodations:	N/A
▪ Number of overnight stays/year:	N/A
▪ Number of snow cannon	-
Investment	
▪ Projected completion	-
▪ Value of investment (local currency and €)	N/A
▪ Investor/s	N/A
▪ Project executant/s (e.g. construction and supply companies)	
▪ Involvement/support of national, regional, local authorities:	The Municipality of Tryavna
Impacts	
Potential environmental risks/concerns (please be	The implementation of the ski resort project would lead to destruction of 45 ha of the following habitats included in Annex 1 of the Habitats Directive: 9150, 9130, 9110, 91W0, 9170, 4060, 62D0, 6520, 8210, 8220. Damaged would be

as specific as possible)	<p>the habitats of Annex 2 species such as <i>*Ursus arctos</i>, <i>*Canis lupus</i> as well as the habitats of species protected by the Birds Directive such as <i>Crex crex</i>, <i>Pernis apivoris</i>, <i>Buteo rufinos</i>, <i>Ciconia nigra</i>, etc.</p> <p>The low altitude of the ski resort means potential risk of erosion due to deforestation and increased water scarcity due to abstraction for production of artificial snow.</p>
Located in a protected area and/or Natura 2000 site?	“Bulgarka” Nature park, “Stolishta” Protected site, “Bulgarka” pSCI (BG0000399), “Central Balkan” SPA (BG0002011).
Environmental assessments/approvals (e.g. EIA, other)	The Strategic Environmental Assessment (SEA) of the project is currently being undertaken.
Other issues/comments:	
Name of person filling out questionnaire	Alexander Dountchev
Email, Telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> Media reports (http://www.xtdev.com/ski/wmview_bg.php?ArtID=1774&fen=0, etc.) A map of the General Spatial Plan (GSP) of the ski resort

Project name:	“Uzana”
Location (community, county):	Municipality of Gabrovo
Other ski facilities within a 60 km radius? (name, distance)	“Triavna”, “Ribaritsa”
Altitude (m above sea level):	1,220-1,350 m a.s.l.
Project description	
▪ Number of ski lifts:	5 old + 1 new
▪ Number of ski runs:	5 old + 2 new ski runs
▪ Length of ski runs (km):	2 + 4
▪ Number of skiers/year:	30,000 (30 days per year)
▪ Number of beds/accommodations:	1,000 (estimate)
▪ Number of overnight stays/year:	N/A
▪ Number of snow cannon	-
Investment	
▪ Projected completion	-
▪ Value of investment (local currency and €)	480,000 Leva or €240,000
▪ Investor/s	N/A
▪ Project executant/s (e.g. construction and supply companies)	N/A
▪ Involvement/support of national, regional, local authorities:	The Municipality of Gabrovo; Program for the development of the tourism in the Municipality of Gabrovo in 2007
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	The implementation of the ski resort project would lead to the destruction of 185 ha of the following habitats included in Annex 1 of the Habitats Directive: 9150, 9130, 9110, 91W0, 9170, 4060, 62D0, 6520, 8210, 8220. Damaged would be the habitats of Annex 2 species such as <i>*Ursus arctos</i> ,

	<p><i>*Canis lupus</i> as well as the habitats of species protected by the Birds Directive such as <i>Crex crex</i>, <i>Pernis apivoris</i>, <i>Buteo rufinos</i>, etc.</p> <p>The low altitude of the ski resort means potential risk of erosion due to deforestation and increased water scarcity due to abstraction for production of artificial snow.</p>
Located in a protected area and/or Natura 2000 site?	See above.
Environmental assessments/approvals (e.g. EIA, other)	
Other issues/comments:	The ski resort project and its General Spatial Plan are presently authorized only outside the protected areas.
Name of person filling out questionnaire	Alexander Dountchev
Email, Telephone	alex.dountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> Media reports (http://www.stroitelstvo.info/show.php?storyid=384141 , etc.)

Ski resorts in the Rhodopi Mountains, Bulgaria

Project name:	“Perelik”
Location (community, county):	Municipality of Smolian
Other ski facilities within a 60 km radius? (name, distance)	“Pamporovo” and “Chepelare”
Altitude (m above sea level):	1,400 – 2,200 m a.s.l.
Project description	
▪ Number of ski lifts:	30
▪ Number of ski runs:	30
▪ Length of ski runs (km):	217
▪ Number of skiers/year:	6,000,000 person days for a period of 100 days
▪ Number of beds/accommodations:	40,000
▪ Number of overnight stays/year:	14, 240, 000 (356 days per year)
▪ Number of snow cannon	1,500
Investment:	
▪ Projected completion	2020
▪ Value of investment ▪ (local currency and €)	300 million Lev (€150 million)
▪ Investor/s	BK Project JSC owned by the off-shore company from Cyprus “Shapiro Investments” Ltd
▪ Project executant/s (e.g. construction and supply companies)	-
▪ Involvement/support of national, regional, local authorities:	The Municipality of Smolyan
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	The implementation of the ski resort project would lead to the destruction of 650 ha of the following habitats included in Annex 1 of the EU Habitats Directive: 4060, 6150, 62D0, 91BA, 9410, 91CA. Damaged would be habitats of Annex 2 species such as *Brown bear and *European wolf as well as the habitats of species protected by the Birds Directive such as woodpeckers: (White-backed Woodpecker, <i>Dendrocopos leucotos</i> , Black Woodpecker, <i>Dryocopus</i>

	<i>martius</i> , Middle Spotted Woodpecker, <i>Dendrocopos medius</i>), owls such as the Eurasian Eagle Owl (<i>Bubo bubo</i>) and others.
Located in a protected area and/or Natura 2000 site?	“Rodopi-Zapadni” pSCI (BG0001030), “Trigrad Mursalitsa” SPA (BG0002113)
Environmental assessments/approvals (e.g. EIA, other)	A Strategic Environmental Assessment (SEA) and appropriate assessment (Habitats Directive Article 6 assessment) are currently being undertaken for the project.
Other issues/comments:	
Name of person filling out questionnaire	Alexander Dountchev
Email, Telephone	alexdountchev@hotmail.com
Sources consulted:	<ul style="list-style-type: none"> • Media report in “Otzvuk” newspaper (8-10 Juni 2007) • A map of the Master Spatial Plan of the ski resort

Ski resorts in the Vitosha Mountain, Bulgaria

Project name:	Aleko Tourist and Ski Zone
Location (community, county):	Municipality of Sofia
Other ski facilities within a 60 km radius? (name, distance)	-
Altitude (m above sea level):	1520 – 2250 m a.s.l.
Project description	
▪ Number of ski lifts:	Existing: 6 ski lifts and 5 ski ropes (13 ha) Planned: 7 new lifts and 6 new ski ropes (27 ha)
▪ Number of ski runs:	Existing: 10 ski runs Planned: 19 ski runs
▪ Length of ski runs (km):	Existing: 12 km Planned: 13 km in addition
▪ Number of skiers/year:	Existing: 1 735 per day Planned: 5 500 per day
▪ Number of beds/accommodations:	Existing: 985 beds Planned: no increase of beds is envisaged in the current plan
▪ Number of overnight stays/year:	Existing: - Planned:
▪ Number of snow cannon	Existing: 10 Planned:
Investment:	€50-80 million
▪ Projected completion	N/A
▪ Value of investment ▪ (local currency and €)	€50-80 million
▪ Investor/s	Vitosha Ski JSC owned by an offshore company Elora Management Ltd registered on the Virgin Islands
▪ Project executant/s (e.g. construction and supply companies)	Not applicable
▪ Involvement/support of national, regional, local authorities:	Sofia Municipality has authorised the development of a ToR from the Ski Zone Detailed Spatial Plan. Regional Environmental Authorities have issued a decision for a start

	of environmental impact assessment of the plan.
Impacts	
Potential environmental risks/concerns (please be as specific as possible)	26 ha of forests will be removed for the implementation of the plan and 46 ha of grasslands will be affected from the construction of the facilities. The area of the ski zone is also part of the habitats of large carnivores like bear (priority species under the Habitats Directive). Some of the ski runs are planned within the water safeguarding areas and the planned use of artificial snow there will affect the drinking water of the city of Pernik and 4 quarters of Sofia city.
Located in a protected area and/or Natura 2000 site?	The detailed spatial plan of the ski zone is completely within Vitosha Nature Park which is also a Natura 2000 site under both EC nature conservation directives.
Environmental assessments/approvals (e.g. EIA, other)	No EIA approvals yet, the procedure for SEA is currently in process.
Other issues/comments:	Preliminary construction works started in 2008 without any environmental permissions. Prosecutors investigation being conducted.
Name of person filling out questionnaire	Katerina Rakovska
Email, Telephone	krakovska@wwfdcp.bg
Sources consulted:	<ul style="list-style-type: none"> • Report on the Strategic Environmental Assessment of Aleko Ski Zone, version of October 2008 • Appropriate Assessment Report on the Strategic Environmental Assessment of Aleko Ski Zone, version of October 2008 • http://www.capital.bg/show.php?storyid=405274

Relevant public sector regulation and/or support for development of ski tourism/facilities:

- Environmental Protection Act (State Gazette No 91/2002);
- Regulation on the terms and conditions for carrying out Environmental Impact Assessment (EIA) (SG 25/18.03.2003);
- Regulation on the Conditions, Procedure and Methods for Environmental Assessment (EA) of Plans and Programs (SG 57/2004);
- Law on Biological Diversity (SG 77/2002);
- Regulation on the terms and conditions for carrying out Assessment of compatibility of Plans, Programs, Projects and Development Proposals with the subject and purposes of conservation of special areas of conservation (SAC) (SG 73/2007);
- Protected Areas Act (SG 133/1998);
- Strategy for the Development of the Bulgarian Tourism for the period 2006-2009 (Bulgarian State Tourism Agency),
- Law on Tourism (SG 56/2002);
- Regulation on categorisation of ski runs (SG 22/2005).

- Law on Territorial Planning/Spatial Development (SG 1/2001);

Additional relevant plans and programmes:

- Management Plan of Rila National Park adopted with Resolution No. 522/04.07.2001 of the Council of Ministers (SG 66/2001);
- Programme for the development of tourism in Municipality Blagoevgrad for the period 2004-2007 (adopted with Resolution No. 123 from Protocol No. 12 from session of the Municipal council Blagoevgrad, which was carried out on 16 April 2004);
- Plan for the development of the Municipality of Blagoevgrad for the period 2007-2013 (adopted with Resolution No. 53 from Protocol No. 6 from session of the Municipal council Blagoevgrad, which was carried out on 28th March 2008);
- Management Plan of Pirin National Park
- Management Plan of Vitosha Nature Park

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