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INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS
МЕЖДУНАРОДНЫЙ СОВЕТ ПО ВОПРОСАМ ПАМЯТНИКОВ И ДОСТОПРИМЕЧАТЕЛЬНЫХ МЕСТ

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Charenton-le-Pont, 3 October 2022

H.E. Mr Peter Reuss
Ambassador, Permanent Delegate
Permanent Delegation of Germany to UNESCO
9, rue Maspéro
75116 Paris

World Heritage List 2023 – Additional Information

Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land (Germany)

Dear Ambassador,

ICOMOS is currently assessing the nomination of the “Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land” as a World Heritage property and an ICOMOS technical evaluation mission has visited the property to consider matters related to its protection, management and conservation, as well as issues related to its integrity and authenticity.

In order to allow us to further evaluate this property, we would be grateful if the State Party could provide us with additional information on the following points:

Identification of the nominated property as a cultural landscape

Section 2.a of the nomination dossier, relative to the description of the nominated property, starts by stating that “[t]he subject of this nomination is an extraordinary alpine cultural landscape, which has developed as a result of centuries of agricultural cultivation in an extreme and particularly diverse natural landscape and which has been preserved to this day” (p. 94). Similarly, at the beginning of section 3.1., on justification for inscription, it is stated that “[t]he nominated property is an outstanding example of a cultural landscape which retains an active social role in contemporary society closely associated with the traditional way of life and in which the evolutionary process is still in progress [...]” (p. 394). However, ICOMOS notes that on section 3.3., the proposed Statement of Outstanding Universal Value refers also to “a grassland farming system” (p. 562). This wording is repeated in other parts of the nomination dossier but similar ones are also used such as “socio-economic system of agriculture” and “system of grassland farming” (p. 564 for instance). ICOMOS further notes that the term “landscapes” (in plural) is also mentioned in different parts of the nomination dossier, namely in relation to the description of the component parts (e.g., pp. 168, 173, 177, 243).

ICOMOS finds that these different terms and wording – cultural landscape, grassland farming system, landscapes – seem to be used interchangeably, however in ICOMOS’ view they can have different interpretations. The differentiation between them is important given that the nominated property is proposed as a serial property consisting of fifty-four component parts, which does not contribute to reflect the idea of an overall cultural landscape, as referred to in paragraph 47ter of the *Operational Guidelines for the Implementation of the World Heritage Convention*. ICOMOS would appreciate if the State Party could

therefore clarify the nature of what is being nominated exactly and especially how the property, as defined through the delineated boundaries, reflects a cultural landscape, as a coherent entity.

On page 394 of the nomination dossier, it is stated that the nominated property constitutes an “organically evolved living landscape”. However, based on paragraph 47bis of the *Operational Guidelines for the Implementation of the World Heritage Convention*, there are two sub-types of organically evolved landscapes: relic (or fossil) landscapes and continuing landscapes. ICOMOS notes that the nomination dossier includes references to both sub-types. On the one hand, it is stated on page 394 for instance that “[t]he nominated property is an outstanding example of a cultural landscape [...] in which the evolutionary process is still in progress [...]”, pointing therefore to a continuing landscape sub-type. On the other hand, on several pages, the nomination dossier refers to fossil cultural landscape areas, with no use. Could the State Party please clarify which sub-type of organically evolved landscapes is the property nominated as? If both sub-types are considered, could the State Party submit a map clearly identifying which areas correspond to each sub-type?

Identification of the nominated property – description of the component parts

The nomination dossier presents the serial property both in terms of “component parts” and “clusters”. ICOMOS notes that the latter is not a term used in the *Operational Guidelines for the Implementation of the World Heritage Convention* and what is meant by this term is not clearly defined in the nomination dossier. In addition, both terms are used in combination on several parts of the nomination dossier (that is, “nominated component parts and clusters”), which generates confusion. Furthermore, ICOMOS notes that in section 2.a. of the nomination dossier there are references to the contribution of the component parts to the proposed Outstanding Universal Value as well as to the contribution of the clusters to the proposed Outstanding Universal Value. A discrepancy between the number of component parts that constitute the nominated property in different parts of the nomination dossier is also observed as follows:

- On page 13 of the nomination dossier and on the table included in section 1.d, fifty-four component parts are mentioned, out of which seventeen individually contribute to the proposed Outstanding Universal Value of the nominated property and thirty-seven are grouped in eleven clusters, with the clusters contributing as a whole to the proposed Outstanding Universal Value of the nominated property;
- On page 12 of the management plan, it is stated that the property is composed of twenty-eight component parts or clusters.

ICOMOS would appreciate if the State Party could explain the rationale for using of the term “cluster” and how it would be relevant for the identification or management of the nominated property compared with the term “component part”. In addition, ICOMOS kindly requests that the State Party provides a succinct and clear explanation, preferably in a table or similar format, of how each of the fifty-four component parts (individually, and not as part of a cluster) contributes substantially to the proposed Outstanding Universal Value as requested by paragraph 137 of the *Operational Guidelines for the Implementation of the World Heritage Convention*.

Boundaries

ICOMOS notes different references throughout the nomination dossier stating that the delineation of the component parts was done in collaboration with relevant stakeholders. It also notes that the land use plans of the respective municipalities were also considered, and that building areas and land foreseen for construction were entirely excluded (p. 598). ICOMOS recognises the importance of such participatory processes but also notes the statement that the delineation of the component parts “represents a compromise between scientific findings and expertise and the different wishes of the various interest groups in the local population” (p. 90). Therefore, ICOMOS would welcome further clarifications as to what parameters were used for delineating the component parts, other than the stakeholders’ different views,

and how those parameters are linked to a clear mapping of the attributes of the nominated property and the conditions of integrity of each individual component part.

ICOMOS notes that the boundaries of several component parts seem quite intricate, with areas within some component parts only linked by a narrow strip of land whereas in other cases it is not clear why there is a division into different component parts. Therefore, ICOMOS would like to know how the boundaries and size of the component parts ensure functional, spatial and/or visual connectivity between the attributes? To what extent are the boundaries aligned with topographic elements, cadastral land parcels or the delimitation of existing natural protected areas?

Buffer zone

The nomination dossier states that a buffer zone has not been defined because it does not protect the property from factors currently affecting it – such as the closing down of farms or changes in agricultural policy – and not in the case of climate change (p. 34). It is also stated that visual relationships are not relevant for the proposed Outstanding Universal Value of the nominated property (*ibid.*) but no explanation is given as to why. Hence, ICOMOS would welcome explanations as to:

- Why visual relationships are not relevant; and
- Why a buffer zone would not be used to give an added layer of protection to the nominated property in response to climate change effects – particularly when the nomination dossier indicates that “[c]limate change increases the need to establish solar parks” (p.598) and that “phenological seasons will increasingly shift... [which] will lead to changes in vegetation and make adjustments in agricultural use necessary” (p. 600).

ICOMOS also notes references to high biodiversity values, at least in relation to the description of several component parts, and would like to know if impacts from adjacent land uses (and from climate change) on those values were considered when deciding that a buffer zone was not needed. Have large-scale spatial and functional dynamics important to maintain the proposed Outstanding Universal Value and integrity of the nominated property been identified? Have factors originating beyond the nominated property been sufficiently considered?

Comparative analysis and selection of the component parts

ICOMOS notes the extensive comparative analysis developed by the State Party and the detailed information included in it. However, ICOMOS considers that some information is difficult to interpret because of the level of detail and the way in which the information is organised. For instance, at the beginning of the comparative analysis (p. 426), it is stated that its purpose is also to justify the selection of the nominated component parts and their boundaries. Yet, ICOMOS notes that a clear description as to how the component parts were selected (and why other areas within the same territory were excluded) seems to be missing. ICOMOS would be grateful if the State Party could provide such description in a succinct manner to facilitate its evaluation process.

ICOMOS also notes the so-called assessment levels that structure the comparisons included in Part 2 – dealing with cultivated grassland landscapes in the Alpine region – are linked to what is called “attributes”, which are then declined in different land-use elements, land-use types and landscape types, creating an extremely complex criteria system. As a result, the comparisons included in Part 2 seem to be mostly based on the differences and inclusion of certain elements rather than clear conclusions as to why the nominated property can be considered outstanding when compared with the fourteen reference areas identified. Therefore, ICOMOS would appreciate if the State Party could provide a succinct descriptive conclusion as to why the nominated property stands out according to the values it expresses compared with those reference areas.

Factors affecting the nominated property

The nomination dossier and the management plan refer to socio-economic change as one of the main factors affecting the nominated property. However, this factor is defined broadly and, as is described in section 4.b as well as other parts of the nomination dossier, it includes in fact several factors that merit to be analysed in detail, namely:

- Challenges of knowledge transfer;
- Changes in agricultural practices including: a) increased mechanisation over time; b) intensification of use (fertilisation and increase in the number of cuts); c) the conversion of litter meadows, grazed moors and dry grassland meadows into fodder meadows and pastures through drainage, ploughing and fertilisation; and d) specialisation in dairy farming;
- Competitive pressure from other uses (although there are no explicit references to which uses are referred to);
- Abandonment of land use, leading to the areas lying fallow and developing into forests (ecological succession); and
- Dependency on subsidies to enable farmers to continue traditional land use and animal husbandry.

ICOMOS would appreciate if the State Party could provide a more detailed analysis on how these factors are affecting the nominated property and especially what strategies and actions are currently being taken to address it. ICOMOS would also like to know if the relationships between socio-economic related factors and climate change related factors and their potential cumulative and multiplying effects have been considered.

Governance arrangements

The nomination dossier indicates that a variety of actors is involved in the protection of the nominated property. However, ICOMOS considers that it is critical to identify who is accountable, from a heritage perspective, for managing the nominated property, especially when considering its complexity and size. Of the actors identified in the management plan (section 4.2), it looks like it is the World Heritage Steering Group that would have a management role over the entirety of the nominated property. However, ICOMOS notes its responsibilities are insufficiently detailed. From the information provided in section 5.j of the nomination dossier, it seems that its twelve or thirteen members, except for the director, would work on a voluntary basis.

The Lower nature conservation authority of the administrative district of Garmisch-Partenkirchen and the Ammergau Alps Nature Park are also mentioned in section 5.j but not included in the table on pages 672-673 of the nomination dossier. This table describes the roles, competencies and responsibilities of different actors in general terms but not really from a heritage management perspective. Therefore, ICOMOS would appreciate if the State Party could clarify what role and responsibilities the Lower nature conservation authority of the administrative district of Garmisch-Partenkirchen and the Ammergau Alps Nature Park would have in the protection and management of the nominated property. In addition, ICOMOS would be pleased if the State Party could answer the following questions:

- Based on the existing and/or proposed governance arrangements, who holds (or will hold) the primary responsibility for managing the nominated property, based on its proposed Outstanding Universal Value?
- What is the institutional mandate of that “primary” manager and what instruments and powers are at its disposal to effectively assume that role?

Legal protection

As the table starting on page 633 of the nomination dossier explains, the areas of some component parts coincide with existing designations such as Natura 2000. ICOMOS would appreciate if the State Party could

submit maps identifying the overlaps between those designations (and other nature conservation related designations) and the delimitation of the component parts.

ICOMOS also notes that, based on the information included in the table referred above, most of the instruments identified are nature conservation related instruments not cultural heritage specific ones. Therefore, ICOMOS would appreciate clarifications about the legal protection of the nominated property, both in its entirety and/or for the individual component parts, as a cultural heritage property.

Management plan

ICOMOS notes that what is proposed as a management plan seems to be in fact what is usually called an overall management framework, intended as a coordination and strategic instrument for the property as a whole. ICOMOS also notes that, as explained in page 7, this document is “without binding effect for legal and natural persons”, and that “[m]anagement or conservation and development plans already exist for component parts of the nominated property” (p. 8) – namely the Habitats Directive-related management plans and the maintenance and development plans “Murnau Moor wetlands west of the Staffelsee Lake and surrounding area”, “Ammergau Alps Nature Park” and “Altenauer Moor”. However, as also explained on page 8 of the management plan, these are “specialised plans for nature conservation”, even if they seem to contain provisions that would be supportive of the protection of the values and attributes of the nominated property from a cultural perspective. In addition, based on the information provided, they only cover fully (or partially) nineteen out of the fifty-four component parts (i.e. A1, A2, A3, A4a, A4b, A5a, A5b, A6, A7, A8a, A8b, A8c, A8d, A9, W9b, W9c, M1, M2, M5).

Against this background, ICOMOS would like further clarifications on how the management plan is integrated with other planning instruments and in the event of conflicts between the provisions included in them, how will the provisions of the management plan prevail, given that the management plan has no binding effect. In addition, given the high number of measures and stakeholders included in the action plan incorporated in the management plan, ICOMOS would like to know how its implementation will be ensured. ICOMOS notes that on page 112 of the management plan, it is stated that “the Steering Committee and World Heritage Coordinator [...] will prepare detailed work plans annually, which will be reviewed at the end of each year [...]”. However, it also notes that the action plan does not include a timeframe as to when the actions are to be implemented nor the resources that will be allocated by the responsible stakeholders for its implementation. ICOMOS would be grateful if information on those aspects could be provided.

Resources

The information included in the nomination dossier on human and financial resources is very general. Therefore, ICOMOS would appreciate more detailed information in this regard, particularly in relation to the technical competencies of the World Heritage Steering Group in relation to heritage management, given that, based on the information included on page 684 of the nomination dossier, seven are farmers and four are representatives of the municipalities. While ICOMOS notes the reference to a specific World Heritage Fund on page 79 of the management plan, there are no details about it. Hence, ICOMOS would also like to know what financial resources will be made available for the Steering Group to implement its functions, who will provide those resources and how sustainable they will be.

We would be grateful if you could provide **ICOMOS** and the **UNESCO World Heritage Centre** with the above information by **Monday 7 November 2022 at the latest**.

ICOMOS appreciates that the timeframe for providing this additional information is short. Brief responses are required at this stage, and can be discussed further with the State Party if needed during the ICOMOS World Heritage Panel.

We look forward to your responses to these points which will be of great help in our evaluation process.

Please note that the State Party shall submit a copy of the additional information to the UNESCO World Heritage Centre and a copy to ICOMOS so that it can be formally registered as part of the nomination dossier.

We thank you in advance for your kind cooperation.

Yours faithfully,



Gwenaëlle Bourdin
Director
ICOMOS Evaluation Unit

Copy to World Heritage Steering Committee 'Alpine and pre-alpine meadows, pastures and wetlands
 in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land'
 Birgitta Ringbeck, World Heritage Focal Point
 German Commission for UNESCO
 UNESCO World Heritage Centre