

---

## Alpine and pre-alpine meadows, pastures and wetlands (Germany) No 1684

---

### 1 Basic information

#### Official name as proposed by the State Party

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

#### Location

Administrative district of Garmisch-Partenkirchen  
District of Upper Bavaria  
Free State of Bavaria  
Germany

#### Brief description

Located on the fringes of the Northern Alps and in the southernmost alpine foothills in the district of Garmisch-Partenkirchen (Upper Bavaria), the serial nominated property encompasses traditionally-cultivated grasslands of various types. Topography, soil composition, and climate make the area difficult to cultivate and of marginal revenue for arable use, favouring the development of grassland farming with livestock husbandry.

Extending over an altitude range between approximately 600 metres and 2,500 metres above sea-level, the fifty-four component parts are located in different natural units: the Wetterstein Mountains; the Karwendel Mountains; the Ammer Mountains; the Niederwerdenfelser Land; the Ester mountains (Kochler mountains); and the Ammer-Loisach hill country (alpine foothills). The nominated property reflects a wide range of traditional meadow and pasture uses, comprising private land and communal grazing areas. Dating back at least to the Middle Ages, communal use is based on a system of rightsholders in which entitled persons exercise precisely-defined usage on land belonging to someone else or on common land.

#### Category of property

In terms of categories of cultural property set out in Article I of the 1972 World Heritage Convention, this is a serial nomination of fifty-four *sites*.

In terms of the *Operational Guidelines for the Implementation of the World Heritage Convention* (2021), paragraph 47, it has also been nominated as a *cultural landscape*.

#### Included in the Tentative List

15 January 2015 as Alpine and pre-alpine meadow and marsh landscapes (historic anthropogenic landscapes in the area of "Werdenfelser Land", "Ammergau",

"Staffelseegebiet" and "Murnauer Moos", district Garmisch-Partenkirchen)

#### Background

This is a new nomination.

#### Consultations and technical evaluation mission

Desk reviews have been provided by ICOMOS International Scientific Committees, members and independent experts.

Comments on the natural attributes of this nominated property, their conservation and their management were received from IUCN on 8 December 2022 and have been incorporated into the relevant sections of this report.

An ICOMOS technical evaluation mission visited the nominated property from 12 to 17 September 2022.

#### Additional information received by ICOMOS

A letter was sent to the State Party on 3 October 2022 requesting further information about the identification of the nominated property as a cultural landscape, the description of the component parts, the boundaries, buffer zone, the comparative analysis and selection of the component parts, factors affecting the nominated property, governance arrangements, the legal protection, the management plan and resources.

Additional information was received from the State Party on 7 November 2022.

An Interim Report was provided to the State Party on 21 December 2022 summarising the issues identified by the ICOMOS World Heritage Panel.

Further information was requested in the Interim Report including: sub-type of cultural landscape, comparative analysis and selection of component parts, justification for inscription, governance arrangements, and legal protection.

Additional information was received from the State Party on 9 February 2023.

All additional information received has been incorporated into the relevant sections of this evaluation report.

#### Date of ICOMOS approval of this report

10 March 2023

### 2 Description of the nominated property

Note: The nomination dossier and additional information contain detailed descriptions of this property, its history and its state of conservation. Due to limitations on the length of evaluation reports, this report provides only a short summary of the most relevant aspects.

#### Description and history

Grasslands are areas where the vegetation is dominated or co-dominated by graminoid and forb growth forms. Semi-natural grasslands are a result of human activity, by

mowing and livestock grazing. A distinction can be made between meadows (mowed) and pastures (grazed by domestic animals). The nominated property includes diverse types of meadows, pastures and wetlands.

Within meadows it is possible to distinguish between litter meadows – cultivated for the purpose of providing bedding for the winter stabling of cattle – and fodder meadows – used to cultivate food crops and winter fodder for the cattle.

Within the nominated property, litter meadows are usually mown from the beginning/middle of September. Whilst in the past the hay was piled up on site to form haystacks and left until winter, this is hardly ever done today.

Different sub-types of fodder meadows are identified: wet meadows; dry meadows; fertile meadows and intensely cultivated agricultural meadows. Wet meadows are usually mown only once, sometimes twice a year. Dry meadows are generally located far away from the settlements and on land that is either too dry, the soil too shallow, or too steep; therefore, they are only mown once, in midsummer. Fertile meadows are usually mown in June and September and are often grazed afterwards. More intensely cultivated meadows are also part of the nominated property. Often located directly adjacent to or closely intertwined with other types of uses, this type of meadow can be mown three to six times per year.

Two types of pastures are identified: single farm cattle pastures and common pastures. The former can be differentiated between valley pastures – usually in close proximity to villages and towns – and alpine pastures – temporary summer pastures, normally used for 120 days per year, reducing the pressure on the valley areas, which can then be used as meadows during that period. Common pastures are often located at the edge of bogs (moorland commons), at the foot of slopes (valley commons) or in valley floodplains (often in river gravel areas). The nominated property also contains areas of wooded pastures.

The nominated property is located in the district of Garmisch-Partenkirchen, which belongs to two climate zones, namely The Alps and Upper Bavarian Alpine Foothills. Despite different climatic conditions, in both cases altitude, maximum precipitation in summer and short vegetation period favoured the development of grassland farming with animal husbandry.

Archaeological findings and pollen diagrams suggest that, in the Late Bronze and Iron Ages, parts of the areas of Upper Bavaria at the edge of the alpine region were already comparatively densely populated. Whereas the first basic pattern of development was laid in Roman times, further development of the land in the early Middle Ages was primarily influenced by the founding of monasteries.

In the mountain landscapes that were cleared during the Middle Ages, the soil was sometimes too barren for arable farming or difficult to plough because of the slope. Therefore, countless herder farms (*vaccariae*) were

established in the mountains, producing large quantities of cheese, the only durable product at the time. In the 12<sup>th</sup> and 13<sup>th</sup> centuries, increased settlement pressure led to the expansion of seasonally-farmed alpine pastures above alpine herder farms.

From the 14<sup>th</sup> century onwards, the old long-distance Venice-Augsburg route, which ran through the county of Werdenfels and the Ammertal Valley, became increasingly important as a trade route. In the 16<sup>th</sup> century and until the middle of the 17<sup>th</sup> century, strong population growth put pressure on cultivated land, particularly in the larger towns. With the consent of the authorities, further forest was cleared in the outer areas up to medium altitudes. Pure Alpine dairy farming was abandoned at the alpine herder farms; some of them evolved into hamlets.

Around 1750, a broad discussion on agricultural reform began. Criticism of the way in which farmers grazed their cattle on the extensive common land later led to the abolishment of communal pasture for cattle and horses. Previously most cattle grazed daily from spring to late autumn on the various common pastures, and in the summer months on the mountain pastures. In the Alpine foothills between 1800 and 1850, people started to keep the animals for longer in their stalls, and, in the case of dairy cattle, in some places all year round. This triggered the demand for stable bedding; litter harvesting became more and more important and the use of litter meadows peaked at that time.

Common areas gradually became dispensable and were divided up and privatised. The new owners now fertilised their plots with the farm's own manure, gradually transforming them into fertile fodder meadows. With the additional fodder harvested, the individual farm was able to bring more livestock through the winter than before. However, there was resistance to allotments from most cattle farmers (especially those with smaller properties and particularly in mountain regions), from the landlords (who regarded their grazing rights as having been restricted), but also from the municipalities, which in the meantime had developed into political communities. In areas with smaller farms (as is the case of the area of the nominated property), there was less incentive to split up common land, therefore forms of common grazing were partly maintained.

During the 19<sup>th</sup> century, the abolition of the feudal land system and the liberation of the peasants influenced agricultural conditions. Self-sufficiency farming (i.e., the combination of arable and livestock farming) was increasingly abandoned and specialisation in dairy farming and market orientation began. The cessation of arable farming and the expansion of meadow cultivation were promoted because of cheap grain imports, now made possible by the construction of the railways. From 1810 to 1854, the cattle population in the Werdenfelser Land increased from 3,476 to 8,700 animals.

The number of livestock on the farm determined the extent of the productive fodder areas. Due to these developments, arable farming had almost completely disappeared and

there was a decline in the proportion of pastureland by about 1950. Around this period, the availability of mineral fertilisers as well as tractors made it possible to further intensify meadow use, even in more remote areas. In parallel, population growth from the 1930s onwards led to settlement expansion and infrastructure development, requiring considerable amounts of land.

Within the nominated property these influences were less severe and far-reaching than in many other areas. The largest preserved wet meadow moor complex in Central Europe, the Murnau Moor, forms part of the nominated property.

The area of the fifty-four component parts totals 19,403.95 ha. A buffer zone has not been defined.

### State of conservation

The State Party has nominated the property as an organically evolved living landscape, in which the evolutionary process is still in progress. Based on the *Operational Guidelines for the Implementation of the World Heritage Convention*, there are two sub-types of organically evolved landscapes: relict (or fossil) landscapes and continuing landscapes. ICOMOS noted that the nomination dossier includes references to both sub-types. Therefore, in its request for additional information sent in October 2022, ICOMOS asked the State Party to clarify which sub-type of organically evolved landscape is the nominated property and, if both sub-types were considered, to submit a map identifying which areas correspond to each sub-type. This distinction is critical since the analysis of the state of conservation depends on the sub-type of cultural landscape that is proposed.

In the additional information, sent in November 2022, the State Party clarified that it considered the nominated property to be a continuing landscape, in which cultivation is critical. It added that some land plots may fall out of active cultivation temporarily (and sometimes for long periods of time) but can be brought back into cultivation. The State Party also submitted a map identifying the areas under continuing land use and areas currently uncultivated or cultivated only to a small extent. The latter seemed to constitute a significant portion of the nominated property. Therefore, in its Interim Report sent in December 2022, ICOMOS asked if the State Party could provide figures (in hectares) of the areas of the nominated property that are currently uncultivated. The State Party replied that this type of information could not be easily determined but considered that it would amount to a maximum of 2,900 hectares.

If meadow cultivation and animal grazing ceases, or when the land lies fallow for long periods of time, ecological succession, that is the gradual transformation of meadows into forest, occurs. This differs from temporary fallow, which was common practice. Likewise, changes in use could also occur but, based on the information included in the nomination dossier, in some cases, areas formerly used as meadows are now predominantly or exclusively used as pastures. Based on the information provided by the State

Party in November 2022, since the 1980s, there has been no significant conversion of litter meadows, destruction of bogs, or intensification of dry grasslands.

Mechanisation produced considerable changes in the last century: the tractive power of oxen was replaced by tractors and areas that used to be mown with a scythe are now often mowed with a motor mower or tractor. However, because of the difficult terrain, a lot of manual labour is still required today. ICOMOS notes that there is hardly any scope to mechanise hay production any further because of the challenging terrain.

Many of the valley floor meadows have been reclaimed in the last few decades as well as some woodland areas.

In the past, the hay was piled up on site to form haystacks and stored until winter; only then was the hay transported by ox- or horse-drawn vehicles across the frozen moors to the farmsteads. That practice is rare today.

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the state of conservation is adequate. However, ICOMOS notes that there is little historical information and data on past land use, including photographic and cartographic evidence supporting the historiography of the landscape (or what is sometimes called landscape biography). The information about the present state of conservation, namely the extent of the nominated property that is currently uncultivated, is also considered insufficient.

### Factors affecting the nominated property

Based on the information provided by the State Party and the observations of the ICOMOS technical evaluation mission, ICOMOS considers that the main factors affecting the nominated property are abandonment of cultivation and fallow land, loss of traditional knowledge, dependency on subsidies, the return of large predators, invasive species, impacts of climate change (namely increases in temperature, leading to changes in vegetation), and natural disasters such as fires, floods, avalanches and mudslides.

In its request for additional information sent in October 2022, ICOMOS noted that the nomination dossier and the management plan refer to socio-economic change as one of the main factors affecting the nominated property. While this factor was defined broadly, the information provided referred in fact to several factors that ICOMOS felt deserved to be analysed in detail, namely the challenges of knowledge transfer; the changes in agricultural practices (including increased mechanisation over time, intensification of use, and the conversion of litter meadows, grazed moors and dry grassland meadows into fodder meadows and pastures and specialisation in dairy farming); the competitive pressure from other uses; the abandonment of land use, leading to areas lying fallow and developing into forest (ecological succession); and the dependency on subsidies to enable farmers to continue traditional land use and animal husbandry.

Traditional and local knowledge is passed down from generation to generation. Based on the observations of the ICOMOS technical evaluation mission, the young generation seems committed to maintaining traditional agricultural practices. However, farming is a part-time occupation for most of the farmers and very few of them have enough livestock to live on farming exclusively.

Increased mechanisation in the past century and challenging geographic and topographic conditions leave limited scope for further significant changes in the future. Very steep slopes and hummock meadows can only be mown manually or with light machinery. The low-lying meadows are so wet that it limits the use of heavy machinery too. Flattening the hummock meadows is strictly forbidden.

Due to the limited capacity of the soil, increasing hay production can only happen with increased fertilisation. However, mineral fertilisation is strictly controlled under environmental protection measures. Changes in land use by ploughing, for example, are forbidden. For the moment, the climate still does not support arable farming. It cannot be excluded that the effects of climate change or shifts in agricultural policy could trigger land-use changes in the future; however, this would also require changes in related legislation. Increased specialisation in dairy farming is not expected. Most farmers have just enough meadow to feed their livestock through the winter. Since many low-lying pastures are still jointly owned by the farming communities and the meadows by the municipality, these lands cannot be bought to increase fodder production. In addition, the price of the land is so high that it is not viable to increase farm production.

In the additional information sent in November 2022, the State Party acknowledges that government subsidies are very important for maintaining the farming system. Currently, about 3.7 million Euros from contractual nature conservation, another 2.0 million Euros from other agri-environmental measures and 8.0 million Euros in European Union co-financed “single farm payments” and “compensatory allowances” flow annually to farms and grazing communities in the district; most of it in connection with the management of the nominated property. Based on information provided by the State Party and the observations of the ICOMOS technical evaluation mission, the likelihood that such subsidies are withdrawn or significantly reduced seems low. However, ICOMOS notes that the extent and condition of meadows and pastures seems to have deteriorated before the introduction of subsidies. Hence, if subsidies were to be reduced in the future, due to changes in public policy priorities, this could have severe repercussions for the protection of the nominated property.

The return of large predators and the presence of other species (referred to in the nomination dossier as “problem” or “nuisance species”) are considered by the State Party to have considerable negative effects on the nominated property. The unchecked spread and pack formation of wolves in particular is considered by the State Party as one

of the main threats. Given the misconceptions often associated with this species, ICOMOS sought advice from IUCN in this regard. IUCN notes that wolves and other large predators are provided with a strict protection status under the Convention on the Conservation of European Wildlife and Natural Habitats (also known as the Bern Convention). IUCN also notes that the nominated property is presented as an example of the harmonious interaction between humans and the environment, which has developed over the course of many centuries. Wolves and other large predators were therefore once part of that environment and careful management and compensation measures can be adopted to mitigate human-wildlife conflicts.

The State Party considers that the threat posed by invasive species is low and that traditional cultivation prevents the uncontrolled spread of neophytes. ICOMOS is of the view that this threat is currently insufficiently considered and deserves greater attention. ICOMOS also notes that no buffer zone is proposed, even though it could help address external threats as well as promote ecological connectivity.

Regarding climate change, in the additional information sent in November 2022, the State Party considers that the nominated property has adapted to considerable climate fluctuations over the centuries. It added that expected temperature increases in the future would be equivalent to other areas in the Southern Alps and that the considerable altitude range within the nominated property offers opportunities for adaptation. Whilst ICOMOS acknowledges the rationale of some of the arguments presented by the State Party, it considers that the threats posed by climate change (which can also exacerbate other factors affecting the nominated property such as the spread of invasive species) should be further analysed.

Risk posed by fires, floods, avalanches and mudslides would also merit further consideration. The State Party considers that the current risk of forest fires is moderate and that of moorland fires is low. However, due to the effects of climate change, the risk of fire could increase in the future. ICOMOS considers that the effects of climate change (at present and in the future) could also increase the risk of landslides, avalanches and floods, even though the State Party considers that these natural hazards are part of the natural dynamics within the nominated property. ICOMOS notes that there is no risk preparedness plan specific to the nominated property and considers that such a plan is necessary to deal with the array of current and potential environmental pressures and natural disasters identified.

---

ICOMOS considers that the state of conservation is adequate and that the main factors affecting the nominated property are abandonment of cultivation and fallow land, dependency on subsidies and potential impacts of climate change. ICOMOS notes that there is no risk preparedness plan specific to the nominated property and considers that such a plan is necessary to deal with the array of current and potential environmental pressures as well as socio-economic changes.

---

### 3 Proposed justification for inscription

#### Proposed justification

The nominated property is considered by the State Party to be of Outstanding Universal Value as a cultural property for the following reasons:

- The nominated property represents the harmonious interaction of humans with the environment in a landscape on the fringes of the Northern Alps.
- This grassland farming system, which has been maintained for centuries, has created an exceptionally wide range of meadows and pastures on the most diverse of sites.

This is a serial nomination of fifty-four component parts, which together are said to represent a continuing landscape, where the evolutionary process is still in progress, and which exhibits significant material evidence of its evolution over time. In its request for additional information sent in October 2022, ICOMOS noted that different terms were used to refer to the nominated property, such as “cultural landscape”, “grassland farming system”, “landscapes”, and that those terms seem to be used interchangeably. ICOMOS observed that those terms have different meanings and therefore asked for clarification in this regard. ICOMOS also stressed that the fact that the nominated property is composed of fifty-four component parts does not contribute to reflecting the idea of an overall cultural landscape. Hence, ICOMOS asked the State Party to clarify how the nominated property, as defined through the delineated boundaries, reflects a cultural landscape, as a coherent entity.

In its response provided in November 2022, the State Party explained that the nominated property corresponds only to one landscape, and that expressions such as “grassland farming system with livestock”, “socio-economic system of agriculture” and “system of grassland management” are used synonymously. It added that the term “landscapes”, used in plural when describing the individual component parts, serves to express the great variety of cultural landscape manifestations and special features of the nominated property. The State Party also argued that the nomination dossier presents numerous examples of the functional relationships between the individual component parts.

ICOMOS notes that the term “landscapes” is used even in relation to individual components parts. ICOMOS considers that the use of the term “landscapes” in relation to the component parts contradicts the identity of the nominated property as a single, coherent, cultural landscape. It also considers that references made to the functional links between the individual components are relevant in relation to the definition of a serial nominated property but in themselves do not justify the rationale of a cultural landscape, as a whole. ICOMOS considers that the issue mainly arises both from the excessive fragmentation resulting from the large number of component parts, and from the small size of some of the component parts. The

State Party also referred to examples of cultural landscapes inscribed on the World Heritage List as serial nominations. ICOMOS stresses that the examples given refer mainly to relict landscapes, in which the evolutionary process came to an end and therefore its former integrity may have been affected over time. ICOMOS also notes that those examples (and others included on the World Heritage List) do not show the same level of fragmentation that characterises the nominated property.

Based on the nomination dossier, the key attributes of the nominated property are the diversity of landscapes and forms of use shaped by agricultural use; the wide range of traditionally-cultivated altitude levels; the livestock diversity, typical of the Alps, and the herd mobility; the farming system, organisational and legal forms; and the agricultural constitution. ICOMOS notes that this identification of the attributes is used, with almost the same exact formulation, as “assessment levels” in the comparative analysis. Whilst the comparative analysis must be based on the understanding of the attributes of the nominated property, attributes and “assessment levels” represent different concepts.

#### Comparative analysis

The comparative analysis has been developed around five “assessment levels”. Four of them reflect almost the same exact formulation as the identified attributes of the nominated property. An additional assessment level is used and is defined as “archaeological and architectural heritage as well as other functional elements of the cultural landscape”. The State Party defines these elements vaguely as structures, infrastructures and the traditional land design adapted to the purpose of use (landforms, terracing, etc.). ICOMOS notes that except for the wooden or log barns, no other built elements, such as human settlements, farmhouses, etc., are referred to throughout the nomination dossier. Moreover, the delineation of the component parts excludes such elements from the nominated property.

The comparative analysis is structured in two parts. The first part focuses on grassland cultural landscapes outside the alpine region; and the second part on cultivated grasslands within the alpine region.

In the first part, the nominated property is compared to the following World Heritage properties: Fertő / Neusiedlersee Cultural Landscape (Austria/Hungary); Hortobágy National Park – The Puszta (Hungary); The Causses and the Cévennes, Mediterranean agro-pastoral Cultural Landscape (France); Pyrénées – Mont Perdu (France/Spain); Madriu-Perafita-Claror Valley (Andorra); Agricultural Landscape of Southern Öland (Sweden); and The English Lake District (United Kingdom). The following places included on Tentative Lists are also compared with the nominated property: Original Meadow-Pasture Sites of Slovakia (Slovakia); Wooded meadows (Estonia); and The Burren (Ireland). In addition, the following places are considered: Rhön, Swabian Alb and the Black Forest (Biosphere Reserves located in Germany); White Carpathians (Biosphere Reserve in Czechia); and

Transylvania (Romania). This part concludes that meadow cultures play a subordinate role in most of the World Heritage properties identified as comparators and that other places have suffered considerable losses in grassland area and quality due to abandonment.

In the White Carpathians, located in the border region between Czechia and Slovakia, and the Transylvania Plateau in Romania, meadow cultures of dry and medium locations still exist in an excellent diversity of types, quality and extent. The State Party argues that both places lack the humid side of meadow cultures, which are best represented in the nominated property. In addition, integration of the meadow cultures with a corresponding mountain pastoral system are less pronounced.

The second part of the comparative analysis is based on the same assessment levels, which are then divided in sub-types/variants creating an extremely complex framework. For instance, there are twenty-five variants associated just with the first assessment level. Therefore, in its request for additional information sent in October 2022, ICOMOS asked the State Party to provide a succinct descriptive conclusion as to why the nominated property stands out according to the values it expresses compared with the fourteen reference areas identified. ICOMOS also requested clarification on the process used to identify the component parts and specifically why other areas within the same territory were excluded. In addition, ICOMOS asked for a succinct and clear explanation of how each of the fifty-four component parts contributes substantially to the proposed Outstanding Universal Value.

Regarding the selection of component parts, the State Party explained, in the additional information provided in November 2022, that they all contribute to the proposed Outstanding Universal Value; that close social, cultural and functional connections have existed between them for centuries; that the nominated property represents a geo-cultural region, namely the grassland cultural landscapes of the mountain zones of Central Europe and the Alpine region, due to its exceptional diversity and, in some cases, outstanding quality of cultural landscape elements; that sustainable land use takes into account the natural environment in which the cultural landscape is embedded; that there is a special spiritual relationship between the local population, especially the farmers, with nature as well as the cultural landscape; and that the nominated property is a traditional cultural landscape which contributes significantly to the preservation of biological diversity.

ICOMOS considers that some of these justifications are too broad and that some relate to the justification of the potential Outstanding Universal Value, rather than offering clear justifications as to how the component parts were selected. ICOMOS also observes similar shortcomings in the justifications given as to how each component part contributes to the proposed Outstanding Universal Value. There is a lot of repetition in the justifications given and parts of it refer to the nominated property as a whole, rather than the way in which each of the component parts contribute to the proposed Outstanding Universal Value.

In its Interim Report, ICOMOS noted that the second part of the comparative analysis is mainly based on a series of narrowly-defined parameters, which are analysed separately. As such, it considered that this approach detracts from the overall understanding of the relative significance of each of the fourteen reference areas identified when compared with the nominated property. Therefore, ICOMOS asked the State Party to provide succinct explanations in a narrative form as to how each of the fourteen areas compares with the nominated property.

Overall, ICOMOS considers that some aspects of the assessment levels are used in a narrow sense. In particular, the use of the sub-types/variants reflects an approach where the comparative analysis is tailored to fit the precise combination of elements the State Party wishes to make salient, and which of course cannot be found in any other heritage place. This is perhaps best exemplified by the focus on altitude range or on the diversity of livestock breeds. ICOMOS also notes that herd mobility is part of the assessment levels; however, there is almost no information about it in the nomination dossier.

ICOMOS considers that the rationale for choosing the component parts is largely related to the delineation of the boundaries of the component parts – and the choices made as to what to include (as well as exclude) from the nominated property – rather than on a clear understanding as to how each component part contributes to the potential Outstanding Universal Value, in a readily defined and discernible way as specified by paragraph 137 of the *Operational Guidelines for the Implementation of the World Heritage Convention*.

ICOMOS is also of the view that the focus of the proposed Outstanding Universal Value on the diversity of Alpine grassland types, limits the scope of the comparative analysis and the understanding of what is important about the different heritage places used as comparators. The comparative analysis shows that meadow landscapes shaped by mowing are widespread. What distinguishes the nominated property is the diversity of meadow and pasture types and the extent of the area still under cultivation. What the comparative analysis has failed to do is to show how meadow cultivation and mowing can be considered in itself outstanding, or how this type of land use has shaped the landscape in an outstanding way.

---

ICOMOS does not consider that the comparative analysis justifies consideration of this property for the World Heritage List.

---

### Criteria under which inscription is proposed

The property is nominated on the basis of cultural criterion (v).

Criterion (v): *be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;*

This criterion is justified by the State Party on the grounds that the nominated property reflects the harmonious interaction of man with the environment in a landscape shaped by the Ice Age on the fringes of the Northern Alps. The State Party adds that the grassland farming system, which has been maintained for centuries, has created an exceptionally wide range of meadows and pastures on the most diverse of sites.

The justification of this criterion depends on whether the nominated property can be seen as an outstanding example of a traditional land use, which is representative of the interaction of man with the environment. ICOMOS considers that the traditional land-use processes exemplified by the nominated property are widespread. The nomination dossier, and the additional information provided, have not sufficiently demonstrated how those processes have created specific manifestations on the landscape, which could be considered outstanding.

ICOMOS also notes that the justification provided by the State Party focuses on a grassland farming system that is based on many small family-based farms. However, the delineation of the component parts focuses almost exclusively on the meadows and pastures and on their variety (i.e., litter meadows, wet meadows, dry meadows, species-rich hay meadows, hummock meadows, common pastures, woodland pastures), which implies a typological approach. In terms of built heritage, only traditional meadow barns are included within the boundaries of the nominated property.

ICOMOS considers that the justification is based largely upon the extent and variety of the grassland areas of the Garmisch-Partenkirchen district and not on evidence as to how the nominated property constitutes a farming system.

---

ICOMOS does not consider that criterion (v) has been demonstrated.

---

### Integrity and authenticity

#### Integrity

The integrity of the nominated property is based on the extent to which the nominated property includes the full representation of the critical elements that constitute the farming system and the functional links between them.

ICOMOS considers that what is included in the nominated property does not reflect a farming system but a collection

of meadows, pastures and wetlands. The nominated property does not reflect other critical elements of the farming system such as human settlements or transhumance routes; woodlands are insufficiently included as well. Woodlands help ensure visual integrity and together with the alpine ridges are critical to the appearance of the landscape.

The State Party considers livestock diversity and herd mobility as one of the main attributes of the nominated property; however, little information is provided about the transhumance routes and drove roads in the nomination dossier. Therefore, in its Interim Report, ICOMOS asked the State Party to provide additional information on this aspect. In the additional information provided in February 2023, the State Party replied that no written or graphic information existed about the grazing drives in the nominated property and, therefore, a survey had to be launched quickly to respond to ICOMOS' request.

In its Interim Report, ICOMOS also enquired about the rationale for excluding built areas from the nominated property. In the additional information sent in February 2023, the State Party indicated that farmsteads are of great importance for the agricultural system and, as such, are decisive elements for the preservation of the proposed Outstanding Universal Value of the nominated property. However, it added that in most cases farmsteads were excluded because they are mostly located within modern settlements and that many have been restructured and rebuilt on numerous occasions.

Integrity is also a measure of the wholeness of the nominated property and whether its size is adequate to ensure the complete representation of the features and processes which convey the significance of the nominated property. In its request for additional information sent in October 2022, ICOMOS noted that the fragmentation of the nominated property into fifty-four component parts does not reflect the idea of an overall cultural landscape.

ICOMOS considers that the rationale for nominating the area as a whole, and how the nominated property might be perceived as an entity, has not emerged clearly from the nomination dossier nor from the additional information that was provided. The delineation of the component parts seems to have been determined largely by considerations related to the typological approach favoured in the nomination dossier and not in relation to the need to express the full representation of the agricultural system. ICOMOS recalls that the comparative analysis has not provided a clear rationale about the choice of the component parts and how they contribute to the proposed Outstanding Universal Value of the nominated property as a whole, in a substantial and discernible way.

ICOMOS also notes that the areas of some component parts are extremely small (the smallest being 1.29 hectares). In its Interim Report, ICOMOS also asked for clarification about the enclaves in some of the component parts, which seemed to result from the exclusion of built

structures. In the additional information provided in February 2023, the State Party explained that the excluded structures would not provide an essential contribution to the proposed Outstanding Universal Value. Only for one particular case – component part W5a - Alpine hummock meadows around the Kranzberg mountain and on the plateau – an explanation is offered for the exclusion; the State Party clarified that this was due to the explicit wishes of the plot owners and the municipality.

Assessing conditions of integrity requires also an analysis of the extent to which the nominated property suffers from adverse effects of development and/or neglect. As regards the size of the uncultivated areas, the State Party has replied that such information was difficult to determine but according to its calculations the areas total 2,900 hectares maximum.

Based on the observations of the ICOMOS technical evaluation mission, although abandonment of agricultural fields and natural evolution have been successfully countered recently, there should be more attention paid to this factor. The technical evaluation mission also observed that some meadows, even now, lay fallow for many years.

Since the nominated property does not include all the necessary elements to represent a farming system with all its social, economic and functional dimensions, and cannot be considered to be of an adequate size, integrity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated.

#### Authenticity

The authenticity of the nominated property is based on whether the potential Outstanding Universal Value is truthfully and credibly expressed through a variety of attributes, namely through use and function, traditions and techniques.

ICOMOS notes that the nomination dossier provides little historical information, relying largely on ecological evidence to assert the authenticity of the landscape. Farming techniques have changed over time; especially since the 1950s, mechanisation has led to the replacement of some traditional practices. Nevertheless, because of the difficult terrain, a lot of manual labour is still required today. Based on the observations of the ICOMOS technical evaluation mission, there are parts of the landscape that were heavily modified by flattening and manuring the meadows. This activity peaked during the interwar period, but the practice was discontinued from the 1940s. Such changes are irreversible and there are elements of the nominated property where these are dominant, although hummock meadows also survived alongside them.

Meadow cultivation and animal husbandry are still based on the annual cycle of the seasons. Common grazing rights go back centuries; the various rights and their developments that were applied to the forests of medieval landlords are well recorded and were maintained over the

centuries almost without interruption to the present day, despite changes in land ownership.

Since the understanding of the attributes related to the completeness of the farming system is insufficient, authenticity, as defined by the *Operational Guidelines for the Implementation of the World Heritage Convention*, is not demonstrated.

In conclusion, ICOMOS considers that the conditions of integrity and authenticity of the whole series, and of the individual component parts, have not been met.

#### Boundaries

In its request for additional information sent in October 2022, ICOMOS noted that the nomination dossier presents the serial property both in terms of “component parts” and “clusters”. Since the latter is not a term used in the *Operational Guidelines for the Implementation of the World Heritage Convention* – and is not clearly defined in the nomination dossier either – ICOMOS considered that it creates confusion. In the additional information sent in November 2022, the State Party explained that the purpose of combining component parts into clusters was to make them visible as belonging together. ICOMOS considers that, as a serial nomination, it is the sum of all component parts that constitutes the whole nominated property, and therefore the term “cluster” should be avoided. The same applies to references to clusters contributing to the proposed Outstanding Universal Value of the nominated property. ICOMOS stresses that each component part (and not the cluster) must contribute to the proposed Outstanding Universal Value of the nominated property as a whole, in a substantial, scientific, readily defined and discernible way.

ICOMOS also asked the State Party to clarify the parameters used to delineate the component parts, other than the different views of the actors, 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 is of the view that the boundaries of several component parts are very 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.

The State Party explained that it followed a three-step process to define the boundaries of the nominated property. First, through cartographic overlay, by identifying a map of potential boundaries of the nominated property, taking into account traditionally managed areas, natural elements, areas with grazing rights and limits of active traditional cultivation; infrastructure and planning areas were cut out. Subsequently, the resulting map was presented to farmers and communities after review by the World Heritage Steering Group and approval by the County Council. This was followed by a long participatory process in collaboration with relevant actors, involving numerous meetings, which led to the final delineation of the boundaries as presented in the nomination dossier.



Based on the observations of the ICOMOS technical evaluation mission, the district of Garmisch-Partenkirchen consists of twenty-two villages and only one of them was not invited to participate in the nomination process; this village is located in the northern extremity of the district where common grazing rights and traditional forms of pastures and meadows have not survived. Two further villages chose not to participate, but the remaining nineteen communities have all taken part in the process.

The boundaries of alpine pastures are aligned with the edge of the clearings, representing the current situation between clearings and woodlands. However, the situation in the past may have been different and might change in the future depending on the intensity of grazing in the woodlands and the effects of climate change. In addition, cattle climb and graze above the edge of the clearings, well into the woodland. Despite this obvious connection, most of the woodlands were excluded from the nominated property. ICOMOS also observed a certain reluctance to include all woodlands where common grazing rights exist but are not exercised. In some circumstances, even in participating villages, some hummock meadows on one side of the road are included in the nominated property but the ones on the other side of the road are not. There were also some concerns about including any farm buildings within the nominated property for fear of additional restrictions and building regulations. This was to some extent confirmed by the answers provided by the State Party in February 2023, in response to ICOMOS' requests about the enclaves in a few component parts.

ICOMOS considers that the fragmentation of the nominated property (coupled with the small size of some of the component parts) diminishes its overall coherence as a proposed cultural landscape. The intricate boundaries of some of the component parts add to the problem, raising overall issues of manageability of the property as a whole.

The State Party has not defined a buffer zone and argues that it is not needed since the main conservation measure needed is active cultivation. It also considers that buffer zones do not safeguard the nominated property from the factors that currently (or could potentially) affect it, such as the closing down of farms, changes in agricultural policy or climate change. The State Party also considers that visual relationships are irrelevant for the proposed Outstanding Universal Value of the nominated property.

In its request for additional information sent in October 2022, ICOMOS asked the State Party to provide details as to why visual relationships are not relevant and why a buffer zone could not be used to give an added layer of protection to the nominated property in response to climate change effects. In the additional information provided in November 2022, the State Party reiterated its position regarding visual relationships, arguing that the values of the nominated property are primarily preserved by the agricultural work of numerous small farms and by grazing cooperatives. It added that the preservation of visual relationships has never played a role in the protection of the nominated property. Regarding the impacts of climate change, the

State Party acknowledges that it expects some shifts in the range of species of grassland habitats but considers that buffer zones are not a suitable instrument to counteract this process.

ICOMOS disagrees with some of the arguments provided by the State Party and considers that visual relationships would be important to consider in relation to the understanding of the nominated property as an agricultural system. In addition to their purpose as an added layer of protection, buffer zones are also important to protect the setting, in cases when the setting is not integral to the proposed Outstanding Universal Value of a nominated property. Buffer zones can also aid with the understanding of a serial property as a coherent entity. IUCN also notes that a buffer zone would contribute to ecological connectivity between the component parts and the integrity of the wider landscape overall.

---

#### **Evaluation of the proposed justification for inscription**

In summary, ICOMOS considers that the nomination dossier and the additional information provided do not clearly explain why the nominated property could be perceived as an entity, nor why it should be considered as a cultural landscape. The framework used to structure the comparative analysis is largely based on a combination of parameters that seems tailored to fit the precise combination of elements the State Party wishes to make salient such as the diversity of meadow types or the altitude range. However, those elements do not justify by themselves why the nominated property should be considered as an outstanding example of a traditional land use.

ICOMOS considers that the attributes that would convey the values of the nominated property as a potential outstanding farming system have not been clearly defined; what is included within the boundaries of the nominated property is only a part of that farming system and basically reflects a collection of meadows, pastures and wetlands. ICOMOS therefore considers that criterion (v) is not justified. Conditions of authenticity cannot be demonstrated without a clear understanding of all the attributes that would reflect how the traditional processes of meadow cultivation and mowing have created specific manifestations on the landscape, and that would reflect other social and functional aspects of the farming system such as the human settlements, the farmsteads and the transhumance routes.

Because of the excessive fragmentation of the component parts, the nominated property does not include all the necessary elements to express its proposed Outstanding Universal Value nor can it be considered to have an adequate size to ensure the complete representation of the features and processes that would convey the significance of the nominated property as a farming system. Hence, the integrity of the nominated property is not demonstrated.

ICOMOS also considers that the boundaries of the nominated property and its fragmentation into fifty-four

component parts (some quite small) are inadequate to convey the understanding of the nominated property as a cultural landscape. ICOMOS considers furthermore that the arguments provided as to why a buffer zone is not needed are not convincing and that visual relationships and ecological connectivity should be given more consideration. A buffer zone could also help address threats such as invasive species. The threat posed by those species is not sufficiently appreciated. The same can be said about the potential impacts of climate change on the nominated property. Therefore, ICOMOS considers that the understanding of factors affecting the nominated property should be strengthened with a view to reinforcing its long-term resilience.

---

## **4 Conservation measures and monitoring**

### **Documentation**

ICOMOS already noted the lack of historical information and data about land use in the past, including photographic and cartographic evidence of the evolution of the landscape over time, in the nomination dossier. ICOMOS notes that the nomination process was the first time that the traditional grassland areas were identified and inventoried, or at least this was the first time that maps of these were produced.

Despite the efforts made by the State Party to provide additional information, there are still considerable documentation gaps. ICOMOS notes the difficulties of the State Party in responding to its requests about the total area of uncultivated or partly-cultivated plots as well as in relation to the transhumance routes and grazing drives. ICOMOS considers that a comprehensive landscape history (or landscape biography) of the area has yet to be developed. Future research could uncover more information on grazing and other rights, the exact extent of associated woodland areas, the dates and exact area of lost or modified pastures and meadows, and similar details, which could lead to a reassessment of the nominated property and the way in which it is currently delineated.

Ecological research about the region, on the other hand, is highly developed, and therefore the materiality of the landscape, at least when it comes to land cover and living organisms in general, is sufficiently recorded and disseminated.

Overall, ICOMOS considers that there is insufficient information about the evolution of the nominated property, about the tangible attributes that would reflect in a clear way the combined works of nature and of man, and about the built fabric of the nominated property.

### **Conservation measures**

The conservation of the nominated property is, to a large extent, dependent on maintaining the continuity of traditional practices of meadow cultivation and mowing as well as animal husbandry. Meadows with steep humps and deep hollows must be mown with a scythe; meadows with flatter humps can be mown with small power mowers and other machines. Some of the meadows are so

“unproductive” that they can only be mown every second year.

Economic incentives and governmental support are also critical to maintaining the nominated property since this is a region of marginal revenue for agriculture. Very few of the farmers have enough livestock to live on farming exclusively; for many, farming is a part-time occupation. The maintenance of agricultural use is supported or made possible by a number of government subsidies, namely the Contractual Nature Conservation Programme (in German VNP); the Cultural Landscape Programme (in German, KULAP); direct European Union payments; and the compensatory allowance for less-favoured areas (LFAs). Based on the nomination dossier, the Contractual Nature Conservation Programme is at the heart of the agri-environmental support programmes. This financial mechanism supports and rewards the cultivation of meadows, pastures, fields and ponds in areas of ecological value. In return, farmers and other actors agree to manage the land for a period of five years in accordance with conservation guidelines, which are generally essentially based on traditional patterns of use.

The maps submitted by the State Party in response to the ICOMOS request as to whether the nominated property was nominated as a relict landscape or a continuing landscape (or a combination of both) shows that large parts of the nominated property are currently uncultivated. For instance, some litter meadows in Murnau show the signs of years or decades of neglect. As such, ICOMOS considers that the possible abandonment of agricultural fields should be tackled through a combination of management responses, since, as clarified by the State Party, it is not possible to legislate against abandonment.

In addition, ICOMOS notes with concern that it is indicated in the nomination dossier that the sole condition for the preservation of the proposed Outstanding Universal Value of the nominated property is the continuation of the centuries-old system of grassland farming and animal husbandry. It adds that the potential inscription of the nominated property on the World Heritage List does not imply any obligation on the part of the farmers to continue to cultivate the land (in any form whatsoever), nor does it lead to the introduction or designation of additional restrictions or protected areas.

Since the State Party confirmed that it nominated the property as a continuing landscape, and not as a relict landscape nor a combination of both, the continuation of the traditional agricultural processes is critical; without it the heritage significance of the nominated property would not be maintained.

### **Monitoring**

ICOMOS considers that the choice of indicators and the frequency for their assessment are overall adequate. ICOMOS advises basing the monitoring programme in a well-established baseline, against which changes can be identified, as well as to identify indicator thresholds that clearly define when action is needed.

ICOMOS notes that a number of organisations are to be responsible for the monitoring of the different indicators and that the results of such monitoring processes are to be kept in different locations. ICOMOS considers that for the monitoring programme to be effective in detecting potential problems concerning the state of conservation of the nominated property and in informing preventive actions, it is necessary to have a data management system that would compile information from different sources.

---

ICOMOS considers that the documentation about the nominated property, both in terms of its history and development, and in terms of important elements of the farming system that would reflect in a clear way the combined works of nature and of man, is insufficient. The understanding of the natural features of the nominated property is deeper than that of the cultural ones. However, as a continuing landscape, and not as a relict landscape nor a combination of both, the understanding of the traditional agricultural processes is critical; without it the heritage significance of the nominated property would not be maintained.

ICOMOS is concerned about the fact that the potential inscription of the nominated property on the World Heritage List will not imply any obligation on the part of the farmers to continue to cultivate the land (in any form whatsoever), nor will it lead to the introduction or designation of additional restrictions or protected areas.

ICOMOS advises basing the monitoring programme in a well-established baseline, against which changes can be identified, as well as to identify indicator thresholds that clearly define when action is needed.

---

## **5 Protection and management**

### **Legal protection**

There is no national (federal) law that protects the nominated property in its entirety because, in Germany, natural or cultural designations are delegated to the Länder. Nevertheless, there are forestry, planning and water protection legislations that include provisions that can affect the entirety of the nominated property.

In its request for additional information sent in October 2022, ICOMOS noted that the areas of some component parts seem to coincide with existing designations such as Natura 2000, and requested the State Party to submit maps identifying the overlaps between those designations (and other nature conservation-related designations) and the delimitation of the component parts. ICOMOS also noted that most of the instruments identified for the protection of the nominated property are nature conservation-related instruments, not cultural heritage specific ones. Therefore, ICOMOS asked for clarification about the legal protection of the nominated property, both in its entirety and/or for the individual component parts, as a cultural heritage property.

The maps submitted by the State Party in the additional information provided in November 2022 show that most of

the component parts are part of protected areas which are legally protected by nature conservation laws, or are located within protected outskirt areas. ICOMOS notes that, in several component parts those protections do not cover the component parts in their entirety, whereas, in some cases both types of protection apply to the same component part.

In its Interim Report, ICOMOS asked about the legal instruments that apply to the protected outskirt areas, since this term is not used in the nomination dossier nor in the management plan. ICOMOS also requested further information about the legal and regulatory measures that apply to settlement areas.

In the additional information sent in February 2023, the State Party replied that those areas are referred to in the nomination dossier. Upon verification, ICOMOS assumes that what the State Party refers to is the term “outdoor areas”. Most importantly, the State Party clarified that the outskirt areas, as well as the settlement areas, are subject to the Federal Building Code. It explained that paragraph 35 of this Code regulates a far-reaching building ban outside of any existing settlement areas and outside of areas that have already been permissibly over-planned.

### **Management system**

The ownership of the nominated property is very complex. Around forty percent of the area of the nominated property is privately owned. Other areas are owned by the administrative district of Garmisch-Partenkirchen, the Free State of Bavaria, the Federal government and the different municipalities.

Consequently, the governance arrangements are also extremely complex. In its request for additional information sent in October 2022, ICOMOS stressed the need 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, ICOMOS notes that the World Heritage Steering Group seems to have a management role over the entirety of the nominated property but that the responsibilities of this Steering Group are insufficiently detailed. Therefore, ICOMOS also requested further details from the State Party on this aspect. In addition, ICOMOS asked for details about the role and responsibilities of the Lower nature conservation authority of the administrative district of Garmisch-Partenkirchen and the Ammergau Alps Nature Park in the protection and management of the nominated property; who holds (or would hold in the future) the primary responsibility for managing the nominated property, based on its proposed Outstanding Universal Value; and the institutional mandate of that primary manager and what instruments and powers are at its disposal to effectively assume this role.

In the additional information provided in November 2022, the State Party replied that the political responsibility does not fall to the World Heritage Steering Group, but to the district of Garmisch-Partenkirchen. The district (and the associated District Office) is the administrative level

responsible for all municipalities in the nominated area. It added that the people who will be responsible for the administration of the nominated property will work in the District Office and that it is the district that will provide the necessary funds for the administration of the nominated property in its budget.

ICOMOS also asked for clarification regarding the nature of the management plan included as part of the nomination dossier, in its request for additional information sent in October 2022. ICOMOS is of the view that what is proposed as the management plan seems to be what is usually called an overall management framework, intended as a coordination and strategic instrument for the property as a whole. ICOMOS also noted that the management plan is without binding effect for legal and natural persons. Therefore, ICOMOS asked for clarification 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 actors included in the action plan incorporated in the management plan, ICOMOS asked for clarification as to how its implementation will be ensured.

In the additional information sent in November 2022, the State Party replied that the management plan took into consideration the provisions included in other existing plans and therefore any potential conflicts are excluded. Regarding the implementation of the plan, the State Party stated that priority measures are already being implemented. It added that the resources for the implementation of the measures will be scheduled annually in the county budgets.

In its Interim Report, ICOMOS asked for some final clarifications about the role of the World Heritage Steering Group, since in the proposed Statement of Outstanding Universal Value included in the nomination dossier it is stated that the Steering Group will be the supreme body for decisions related to the nominated property. The State Party clarified, in the additional information of February 2023, that it is the District Council that bears the political and organisational responsibility for the nominated property. The Steering Group has been established during the nomination process to guarantee that the farmers and the municipalities are part of the governance arrangements. The State Party included a diagram that clarifies the governance arrangements and submitted a revision to the section on protection and management requirements of the proposed Statement of Outstanding Universal Value to reflect adequately the roles of the District Council and the Steering Group.

#### **Visitor management**

The high volume of visitors and traffic are reported by the State Party as one of the factors affecting the nominated property. In periods of high visitation, traffic jams can occur regularly on the roads and in the parking areas. Unofficial parking outside of designated parking spaces can also be a nuisance.

It is not possible to determine precise visitor numbers since the component parts are open areas. The District Office of Garmisch-Partenkirchen publishes the tourism figures for its individual municipalities every year; these are mainly based on accommodation figures and guest surveys. Visitation is highest in summer.

Visitors to the nominated property are primarily attracted by its aesthetic qualities, as well as the diverse opportunities for sporting activities. ICOMOS notes that tourism development opportunities are curtailed by natural and landscape protection restrictions; geomorphology also hinders certain types of developments.

There is no specific tourism strategy for the nominated property. Based on the information included in the nomination dossier, a traffic and visitor management concept of the brand Zugspitz-Region Garmisch-Partenkirchen is being developed.

At present, there is no museum or visitor centre within or in the immediate vicinity of the nominated property that is explicitly and specifically dedicated to it.

The management plan of the nominated property includes some provisions related to visitation and tourism, such as launching specific visitor research and periodic visitor surveys. However, these provisions are expected to be undertaken only if the nominated property was to be inscribed on the World Heritage List.

#### **Community involvement**

Based on the information provided in the nomination dossier, a very high number of people and institutions were involved with the nomination process. The State Party acknowledges that concerns over additional restrictions and obligations sometimes required compromises. The local population, particularly the agricultural community, was involved in the issues concerning the definition and demarcation of the nominated property in the form of a bottom-up and community right-based approach. The key documents constituting the nomination dossier, including the management plan, were made available for public discussion between 2019 and 2021.

In the area where the nominated property is located, communal grazing on common land based on ancestral customs has been preserved to a high degree up until today. The *Rechtlerwesen*, or system of rightsholders, has proved to be a decisive factor in preserving the small-scale structure of agriculture in the area. In almost all villages, there are still rightsholder communities, sometimes several per village. Based on the information provided in the nomination dossier, out of the thirteen expected members of the UNESCO Steering Committee, seven will be farmers, including district farmers of the Alpine Pasture Farming Association of Upper Bavaria, and the district chairman of the Bavarian Farmers' Association.

---

### **Effectiveness of the protection and management of the nominated property**

In summary, ICOMOS considers that the legal framework is adequate for the nominated property as it is currently presented. As for the planning framework, ICOMOS notes the assurances of the State Party that the management plan is well integrated with other planning instruments and that no conflicts exist between the provisions of the different plans. ICOMOS is of the view that the management plan reflects what is normally called a management planning framework. This is considered appropriate given the large area of the nominated property and the high number of components parts. However, ICOMOS notes that the management plan has no binding effect and is to be implemented by a considerable number of actors. Ensuring its implementation will therefore prove challenging without strong collaboration between these actors as well as regular monitoring to track progress.

The governance arrangements are considered adequate after the clarifications provided by the State Party through the additional information sent.

---

## **6 Conclusion**

The Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land is presented as an outstanding example of the harmonious interaction of humans with the environment in a landscape shaped by the Ice Age on the fringes of the Northern Alps. Nominated as a continuing cultural landscape, the property is said to represent a grassland farming system, which has been maintained for centuries and has led to an exceptionally wide range of meadows, pastures, and wetlands.

ICOMOS considers that one of the most important aspects of the nominated property is the extent to which the communal grazing on common land, based on ancestral customs, has been preserved. ICOMOS acknowledges that the traditional processes of meadow cultivation and mowing, or the driving of livestock to pastures, are deeply anchored in the local cultural identity, and that local communities are dedicated to continuing the traditional agricultural practices.

ICOMOS appreciates the efforts made by the State Party to respond to its requests for clarification. However, despite all the additional information provided, ICOMOS considers that it has not been demonstrated that the nominated serial property, as currently delineated, constitutes a cultural landscape. In addition, ICOMOS considers that for the nominated property to represent a grassland farming system, the delineation of its boundaries would have needed to include other physical manifestations of such a system. Whilst the State Party described the nominated property as a socio-economic system of land and resource use that is based on many (mostly) small family-based farms, ICOMOS notes that no farmsteads are included within the proposed boundaries. The only built structures included are the traditional wooden barns. ICOMOS

considers that the meadows, pastures, and wetlands do not exist in isolation from the other elements of the farming system.

The property is nominated as a cultural landscape – which represents the combined works of nature and of man – and is proposed as an example of the interaction of humans with the environment. Therefore, it was critical to identify how the traditional processes of meadow cultivation and mowing, as well as animal husbandry, have created specific manifestations on the landscape, which could be considered outstanding. ICOMOS considers that those manifestations have not been clearly identified. Diversity of meadows, pastures and wetlands is insufficient to justify exceptionality. Therefore, ICOMOS considers that criterion (v) has not been demonstrated.

ICOMOS also notes a lack of documentation about the evolution of the nominated property over time; the nomination dossier includes little historical information and data about land use in the past, including photographic and cartographic evidence of the evolution of the landscape over time. Whereas documentation on ecological aspects of the nominated property seems to be readily available, ICOMOS considers that there is insufficient documentation about important aspects of the farming system, namely in terms of the areas that are presently uncultivated or partly cultivated, and in relation to the transhumance routes and grazing drives.

The comparative analysis, despite its length and complexity, has been based on a series of parameters which in some cases are used in a narrow sense, such as the altitude range, and in others are related to elements for which there is insufficient information, such as the herd mobility, or which relate to features that are only marginally included within the nominated property, like the archaeological and architectural heritage.

ICOMOS considers that the framework used to develop the comparative analysis does not provide evidence that the nominated property would merit consideration to be included on the World Heritage List, especially given its lack of cohesion as an entity. ICOMOS also notes that the selection and delineation of the component parts is largely influenced by considerations other than the mapping of the attributes or the reasons why each component part contributes to the proposed Outstanding Universal Value, in a readily defined and discernible way.

ICOMOS considers that the excessive fragmentation of the nominated property into fifty-four components parts, some quite small, is a particular weakness of this nomination. Consequently, since the nominated property does not include all the necessary elements to represent a farming system with all its social, economic and functional dimensions, and cannot be considered to have an adequate size, conditions of integrity are not met. Overall, the nominated property does not suffer from considerable adverse effects of development or neglect. However, ICOMOS notes the lack of precise information about the total area of the uncultivated or partially-cultivated plots. In

addition, ICOMOS notes that farming is now a part-time occupation for many of the farmers in the nominated property; very few of them have enough livestock to live on farming exclusively.

Whilst there is continuation in terms of use and function as well as traditions and techniques, conditions of authenticity cannot be demonstrated because of insufficient understanding of the attributes related to the completeness of the farming system.

The fragmented character of the nominated property is reflected by the proposed boundaries. Moreover, a buffer zone has not been proposed, although ICOMOS considers that it can contribute to the understanding of the nominated property as a whole, and to ecological connectivity.

In general, the governance and management arrangements are considered adequate for the protection of the nominated property as delineated, but some aspects could be improved. ICOMOS is concerned about several statements included in the nomination dossier that the potential inscription of the property on the World Heritage List would not lead to the introduction or designation of additional restrictions or protected areas. The State Party considers that the nominated property would be protected mainly by maintaining, strengthening, and expanding the existing system of positive incentives, in order to enable the farmers to continue traditional land use and animal husbandry.

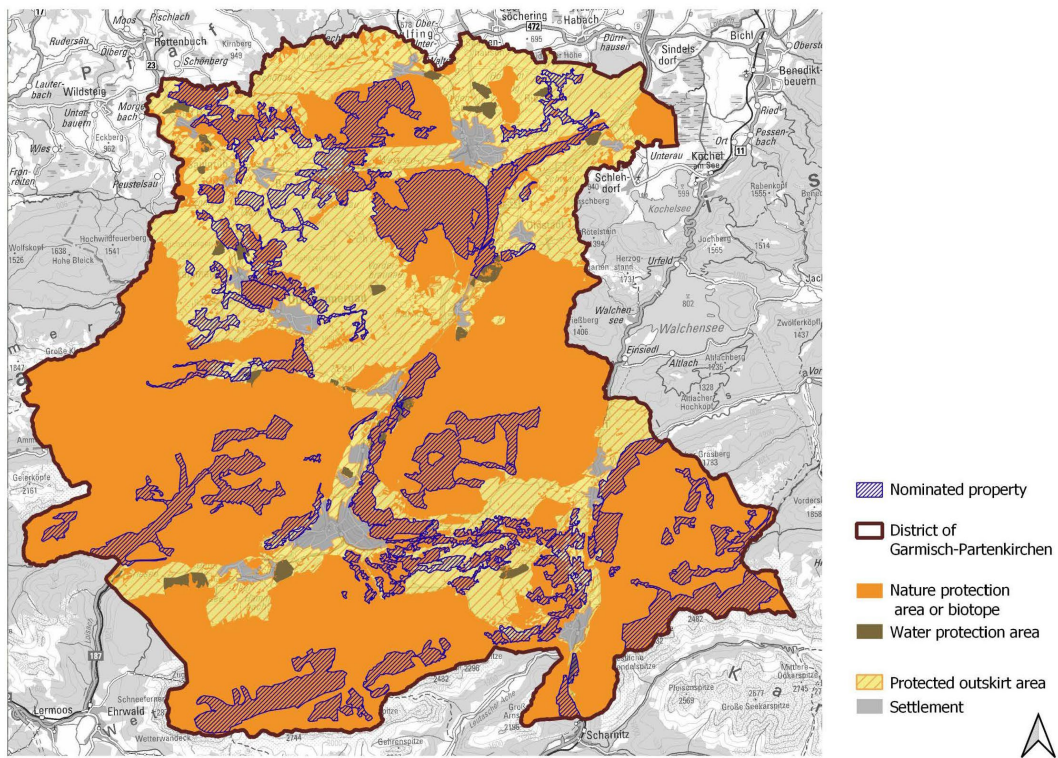
ICOMOS also notes that some of the factors that could potentially affect the nominated property, such as the impacts of climate change and invasive species, are insufficiently addressed and would merit further consideration. ICOMOS considers that the long-term vulnerability of the nominated property in the face of social, economic and environmental change should be addressed.

ICOMOS considers that the fundamental premise of the current nomination to concentrate mainly on a collection of meadows, pastures and wetlands, and on their diversity, is insufficient to demonstrate how the nominated property reflects an outstanding example of a traditional land use which is manifested in an exceptional form in the landscape. In conclusion, ICOMOS considers that the nominated property does not justify Outstanding Universal Value and cannot be recommended for inscription on the World Heritage List.

## 7 Recommendations

### Recommendations with respect to inscription

ICOMOS recommends that the Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land, Germany, should **not be inscribed** on the World Heritage List.



Map showing the boundaries of the nominated component parts (November 2022)