

# ICOMOS

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

Our Ref. GB/EG/1684/IR

Charenton-le-Pont, 21 December 2022

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

## World Heritage List 2023

**Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land (Germany) – Interim report and additional information request**

Dear Ambassador,

As prescribed by the *Operational Guidelines for the Implementation of the World Heritage Convention* and its Annex 6, the Advisory Bodies have to submit a short interim report for each nomination by 31 January 2023. We are therefore pleased to provide you with the relevant information outlining issues related to the evaluation procedure.

The ICOMOS technical evaluation mission to the “Alpine and pre-alpine meadows, pastures and wetlands in the Ammergau, the Lake Staffelsee Area and the Werdenfelser Land” was carried out by Mr. Kristof Fatsar (Hungary) in September 2022. The mission expert highly appreciated the availabilities and support provided by the experts in your country for the organisation and implementation of the mission.

On 3 October 2022, a letter was sent by ICOMOS to request further information regarding the identification of the nominated property as a cultural landscape, the description of the component parts, the boundaries, the buffer zone, the comparative analysis and the selection of component parts, the factors affecting the nominated property, governance arrangements, legal protection, the management plan, and the resources. Please convey our thanks to all the officials and experts for the additional information you provided on 7 November 2022 and for their continued cooperation in this process.

At the end of November 2022, the ICOMOS World Heritage Panel evaluated the cultural and mixed properties nominated for inscription on the World Heritage List in 2023. The additional information provided by the State Party, together with mission and desk review reports were carefully examined by the Panel members. This process will conclude in March 2023.

We thank you for the availability of your Delegation for attending the meeting held on 25 November 2022 with some representatives of the ICOMOS Panel. During the last part of its meeting, the ICOMOS Panel discussed this nomination and has considered that the property does not fulfil at this stage the

requirements set out in the *Operational Guidelines for the Implementation of the World Heritage Convention*.

While ICOMOS appreciates the extensive information included in the nomination dossier of this complex serial nomination, it considers that the understanding of the nominated property as a grassland farming system on the one hand and as a cultural landscape on the other hand is essential to determine whether or not the nominated property has potential Outstanding Universal Value.

Therefore, we would be pleased if the State Party could consider the following points:

#### **Sub-type of cultural landscape**

ICOMOS, in its request for additional information, asked clarifications about which sub-type of organically evolved landscapes is the property nominated as. The ICOMOS Panel appreciates the map submitted showing the areas under continuing land use and those with plots currently uncultivated or cultivated only to a small extent. ICOMOS would like to know the exact figure (in hectares) of the area of the nominated property that is currently uncultivated.

The ICOMOS Panel also notes the reply of the State Party in the additional information provided in November 2022 which states that “[t]he property is nominated as a “continuing cultural landscape””. However, in the same additional information, the term “relict” is still used. ICOMOS recalls that the *Operational Guidelines for the Implementation of the World Heritage Convention* define, on its paragraph 47bis, a relict landscape as “one in which an evolutionary process came to an end at some time in the past, either abruptly or over a period. Its significant distinguishing features are, however, still visible in material form”. Therefore, ICOMOS would appreciate receiving clear confirmation from the State Party that no areas of the nominated property are to be considered to fall under the sub-type of “relict (or fossil) landscape”.

#### **Comparative analysis and selection of component parts**

The ICOMOS Panel acknowledges the enormous effort that was invested in preparing the comparative analysis. However, the ICOMOS Panel considers that the information provided in part 2 of the comparative analysis is mainly based on a series of narrowly defined parameters, which are analysed separately. According to the ICOMOS Panel, this approach detracts from the overall understanding of the relative significance of each of the fourteen reference areas considered when compared with the nominated property. That is, in ICOMOS’ view, the comparisons as presented in the nomination dossier focus on how each of the reference areas includes a combination of elements that is different than that of the nominated property instead of clearly explaining why the nominated property should be considered to be outstanding.

Therefore, ICOMOS would be pleased to receive a succinct explanation of how each of the fourteen reference areas identified compares with the nominated property, presented in a similar narrative way to the conclusions in relation to the White Carpathians in the Czech Republic and the Transylvanian Plateau in Romania, included on page 450 of the nomination dossier.

#### **Justification for inscription**

The justification for inscription included in the nomination dossier presents the nominated property as a grassland farming system and identifies the following four attributes: 1) “the diversity of forms of use and of landscapes shaped by agricultural use”; 2) “the wide range of traditionally cultivated altitude levels”; 3) “the livestock diversity, typical of the Alps, and the herd mobility”; and 4) “the farming system, organisational and legal forms, agricultural constitution”. However, the ICOMOS Panel considers that

the way in which the boundaries of the nominated property are delineated seems to focus mainly on meadow cultivation and the diversity of meadows and pastures.

The ICOMOS Panel notes that the information regarding “livestock diversity and herd mobility” included both in section 2a. (on the description of the property), and in section 3.1 (on the justification for inscription) of the nomination dossier focuses almost exclusively on the diversity of livestock and livestock breeds. There is little information about herd mobility, at least presented in a clear manner in the sections dedicated to this attribute; some information exists but is scattered throughout the nomination dossier and is considered insufficient. Hence ICOMOS would appreciate further information in this regard, preferably supported by graphical information, which would allow a better understanding of herd movements in the landscape (particularly in terms of long-distances but also in relation to daily drives).

The ICOMOS Panel also notes that except for the traditional barns and perhaps a few other exceptions, no other types of buildings are included in the nominated property. It was noted that some components parts even include some “enclaves” because of the exclusion of built structures. However, one of the assessment levels identified to structure the comparative analysis is entitled “archaeological and architectural heritage as well as other functional elements of the cultural landscape”. Hence, ICOMOS would appreciate if the State Party could explain the rationale for excluding built areas from the nominated property and, in particular, how the understanding of the property as a grassland farming system can be considered complete without the inclusion of the settlements where farmers live as well as other built structures such as the stables to house the animals.

### **Governance arrangements**

The ICOMOS Panel appreciates the additional information already submitted in this regard and appreciates the clarification that, *politically* the Administrative district of Garmisch-Partenkirchen District Office will be responsible for the administration of the nominated property. However, the ICOMOS Panel notes that the section on “protection and management requirements” of the proposed Statement of Outstanding Universal Value included in the management plan states that “the steering group is the supreme body for decisions relating to the nominated property”. Therefore, the ICOMOS Panel considers that the governance arrangements for the nominated property are, at present, insufficiently explained and would appreciate further information in this regard. ICOMOS would appreciate receiving clarifications as to which of the Administrative district of Garmisch-Partenkirchen District Office or the World Heritage Steering Group should be considered the main manager for the nominated property as a whole, from a heritage management perspective.

In particular, ICOMOS would be pleased if the State Party could provide further information on the responsibilities of this main manager, especially regarding the development and implementation of the management plan; the coordination of different actors (i.e. other organisations or agencies as well as rightsholder and stakeholder groups) that will directly and indirectly contribute to the management of the nominated property; the application of legislative and regulatory measures; and the monitoring of the state of conservation of the nominated property as a whole.

In addition, ICOMOS would appreciate if the State Party could provide a graphical representation of the governance structure for the nominated property, in which all the main organisations and agencies involved in the management of the nominated property (either as a whole or parts of it) are included.

### **Legal protection**

The ICOMOS Panel appreciates the map of the areas which are currently protected by the nature conservation law with an overlay of the nominated component parts. The ICOMOS Panel notes that the

areas shown in yellow are called “protected outskirt area” but that this term is not used in the nomination dossier nor in the management plan. Therefore, ICOMOS would like to know which legal instruments apply to those areas, and, in particular, the legislative and regulatory measures associated with it. ICOMOS would also appreciate receiving the same information about the ‘settlement’ areas, shown in grey.

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

We would be grateful if you could provide **ICOMOS** and the **World Heritage Centre** with the above requested information by **28 February 2023 at the latest**, the deadline set out in paragraph 148 of the *Operational Guidelines for the Implementation of the World Heritage Convention* for additional information on nominations to be received. Please note that any information submitted after this date will not be considered by ICOMOS in its evaluation for the World Heritage Committee. It should be noted, however, that while ICOMOS will carefully consider any additional information submitted, it cannot properly evaluate a completely revised nomination or large amounts of new information submitted at the last minute. So, we would be grateful if the State Party could keep its response concise and respond only to the above requests.

We thank you for your support of the World Heritage Convention and the evaluation procedure.

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’  
Friederike Hansell, World Heritage Focal Point  
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