

Are the ski facilities in Bansko Ski Zone within Pirin National Park legal?

(A rebuttal of the claims of the Minister of Environment and Water Nona Karadzova that “Bansko Ski Zone is formally legal”)

In order to answer the question how legal are the skiing facilities in Bansko Ski Zone, the experts of the “ForTheNature” Coalition of NGOs carried out a legal analysis (see Table 1) which examines the following:

- Was the ski facility envisaged in the Concession Contract for Bansko Ski Zone and respectively – in the Management Plan (MP) of Pirin National Park¹?
- Were the construction regimes of the MP and the conditions in the Environmental Impact Assessments (EIA) (issued by the Ministry of Environment and Water) abided by?
- Did Bansko Municipality issue construction permits for the construction of the skiing facilities and infrastructure?

For the purposes of the analysis, the following have been used: geographic information systems, Google Earth satellite pictures, a zoning map of Pirin National Park according to the MP of the Park, a map and data about the skiing facilities in Bansko Ski Zone provided by “Yulen” JSCo. (fig. 6), the Concession Contract and a scheme of the territory of the concession (fig. 7), the available EIA decisions, reference of the Pirin NP directorate about the illegal clear cuttings in Bansko Ski Zone and a reference about the construction permits issued by the Directorate for National Construction Control.

The most obvious and undeniable violations that brought to the cutting of 64,7 ha centuries-old forests in Pirin National Park which fall outside of the area conceded according to the concession contract of 99,5 ha are the following:

- 1. Construction and usage of ski runs and lifts (incl. a restaurant with a total built-up area of more than 1200 sq. m and water reservoir of more than 1000 m³ in the locality of Banderishka polyana), which are not envisaged in the Management Plan of Pirin National Park (as well as in the Territorial Plan of Bansko Ski Zone from 2001) and in the concession contract: ski runs “Platoto 1” (north of the ski drag Platoto-Todorka), “Chalin valog 2 - West, as well as the ski lifts that were built in 2010 with the consent of minister Karadzova: “Banderishka polyana-Kolarski pat” (6-seat lift) and “Platoto-Todorka (4-seat lift) (see fig. 1, 2, 3 and 4).**
- 2. Construction of ski runs “Shiligarnika 2” (No.10) and “Strazhite” (No. 12), as well as ski lift “Zhelezen most-Platoto” (4-seat lift) outside of the domain of the concession territory (fig. 4).**
- 3. Construction of all ski runs and ski roads without construction permits.**
- 4. Construction of ski runs “Bansko” (No.1), “Banderitsa” (No.2), “Balkaniada” (No.4), “Shiligarnik 1” (No.5), “Yulen” (No.8), “Tomba” (No.9), “Platoto 2” (No.11), “Chalin valog 1” (No.15) without respecting the width requirements and the requirement for minimal excavation works, specified in the EIA decision issued by the Ministry of Environment and Water. (For instance: the EIA decision requires that the ski run “Banderishka polyana-Todorka” be no more than 30 m wide, and the width of the forest cutting for the lift – no more than 6 m. However, the actual width of the ski run currently is between 60 and 100 m, and the width of the cutting for the lift is between 15 and 30 m, more than 100 000 sq.m. and more than 35 000 cubic m. have been modeled through excavation and construction works.) (See fig. 1-13).**

¹ The Management Plan of Pirin National Park 2004-2013 was developed under the guidance of the Ministry of Environment and Water, with the financial assistance of the Swiss Government, and after consultations with UNESCO which aimed to ensure the protection of the world natural heritage in Pirin. The Plan was adopted with a decision of the Bulgarian Government in 2004.

Tabl. 1. Legal status of the skiing-facilities in the Bansko Ski Zone in Pirin National park

Legal status* of the skiing-facilities in the Bansko Ski Zone in Pirin National park				
	Management plan of Pirin NP**	Concession agreement**	EIA decisions of the MoEW	Construction permit
SKI RUNS				
Bansko No.1	+	+	Illegal clear cuts and excavation works	-
Banderitsa No.2	+	+	Illegal clear cuts and excavation works	-
Plato 1 No.3	-	-	-	-
Balkaniada No.4	+	+	Illegal clear cuts and excavation works	-
Shiligarnik 1 No.5	+	+	Illegal excavation works	-
Shiligarnik 1 No.5a	-	-	-	-
Todorka No.6	+	+	+	-
Stara pista No.7	+	+	+	-
Julen No.8	+	+	Illegal clear cuts	-
Tomba No.9	+	+	Illegal clear cuts and excavation works	-
Shiligarnik 2 No.10	-	-	-	-
Plato 2 No.11	+	+	Illegal clear cuts and excavation works	-
Strazhite No.12	-	-	-	-
Chalin valog 1 No.15	+	+	Illegal clear cuts and excavation works	-
Chalin valog 2 No.16	-	-	-	-
SKI-LIFTS				
Cabin lift Bansko- Banderishka polyana	+	+	+	+
4-seats lift Zhelezen most – Plato	-	-	?	+
Demounted 4-st lift Banderishka polyana–Kolarski pat	+	+	+	+
6-seats lift Banderishka polyana – Kolarski pat	-	-	Illegal clear cuts	?
4-seats lift Banderishka polyana – Todorka	+	+	Illegal clear cuts	+
4-seats lift Shiligarnik – Platoto	+	+	Illegal clear cuts and misplaced position	+
4-seats lift Chalin valog	+	+	Illegal clear cuts and misplaced position	+
3-seats lift Shiligarnik – Todorka	+	+	+	+
Drag-lift Plato – Todorka	+	+	+	+
Drag-lift Stara pista	+	+	+	+
Drag-lift Shiligarnik - Stara pista	+	+	+	?
4-seats lift Plato – Todorka	-	-	+	?
Drag-lift Banderishka polyana	-	-	-	+
Drag-lift Chalin valog	-	-	-	?
BUILDINGS AND TECHNICAL INFRASTRUCTURE				
Restaurant with total built-up area >1200 sq.m in Banderishka polyana site	-	-	Smaller project was allowed	?
Biatloon shooting ground	-	-	-	+
Rillbahn with asphalt cover	-	-	-	?
Water reservoir for artificial snow (>1000 m ³) in Banderishka polyana site	-	-	Smaller project was allowed	+
Wastewater treatment plant	+	+	?	?
Traffs	+	+	?	+
Drainage systems	?	?	-	+

* "-" – not planned and/or built without permit, "+" – planned and/or built with permit, "?" – no information

** includes the prescriptions of the Spatial Plan of Bansko Ski Zone 2001

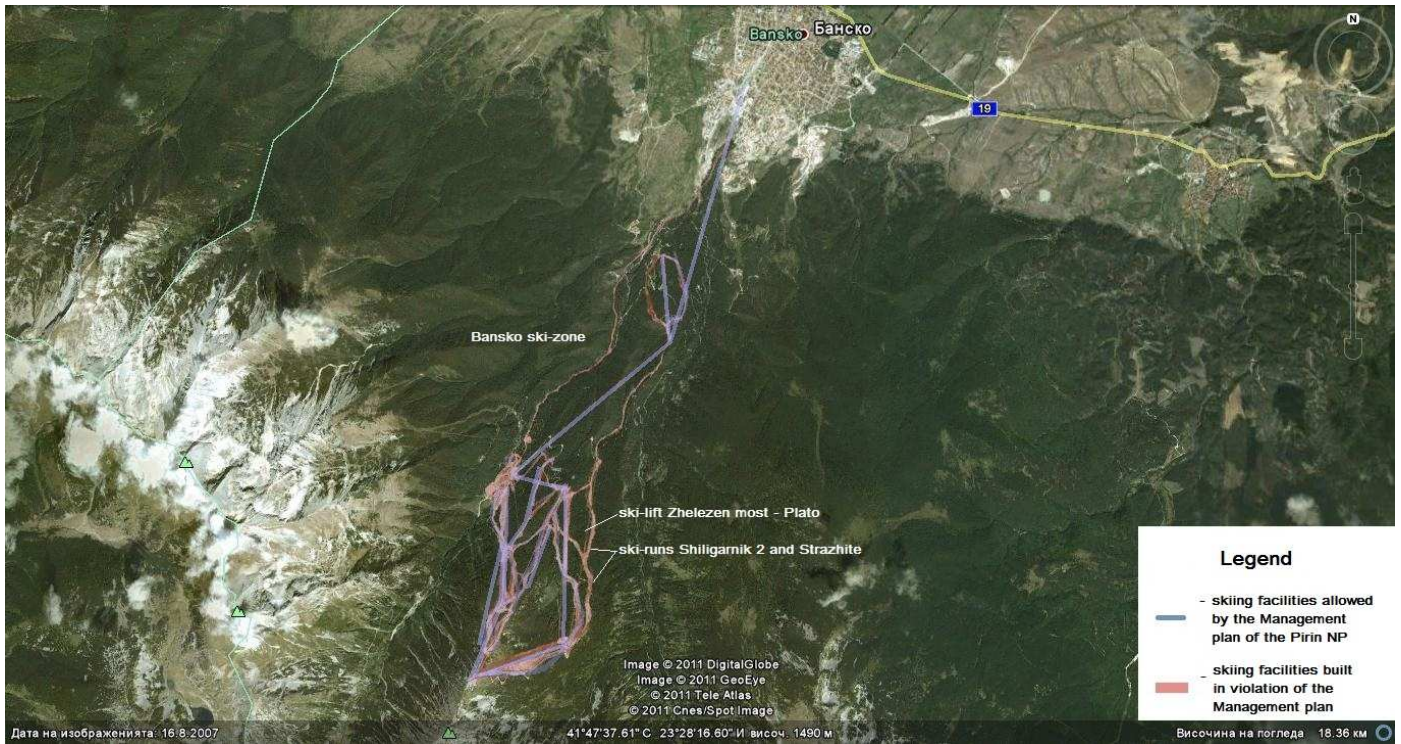


Fig. 1. Bansko ski-zone

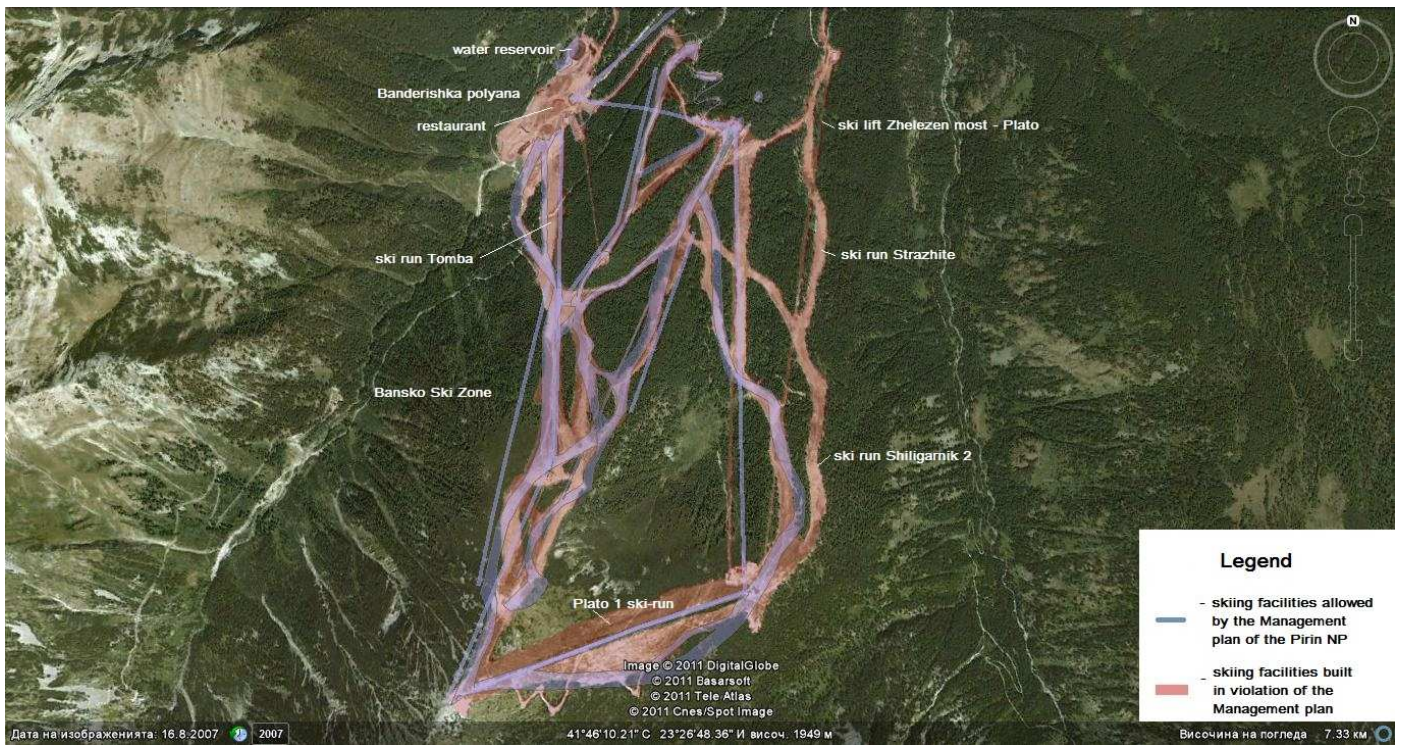


Fig. 2. Bansko ski-zone (Banderishka meadow - Shiligarnika – Todorka peak)

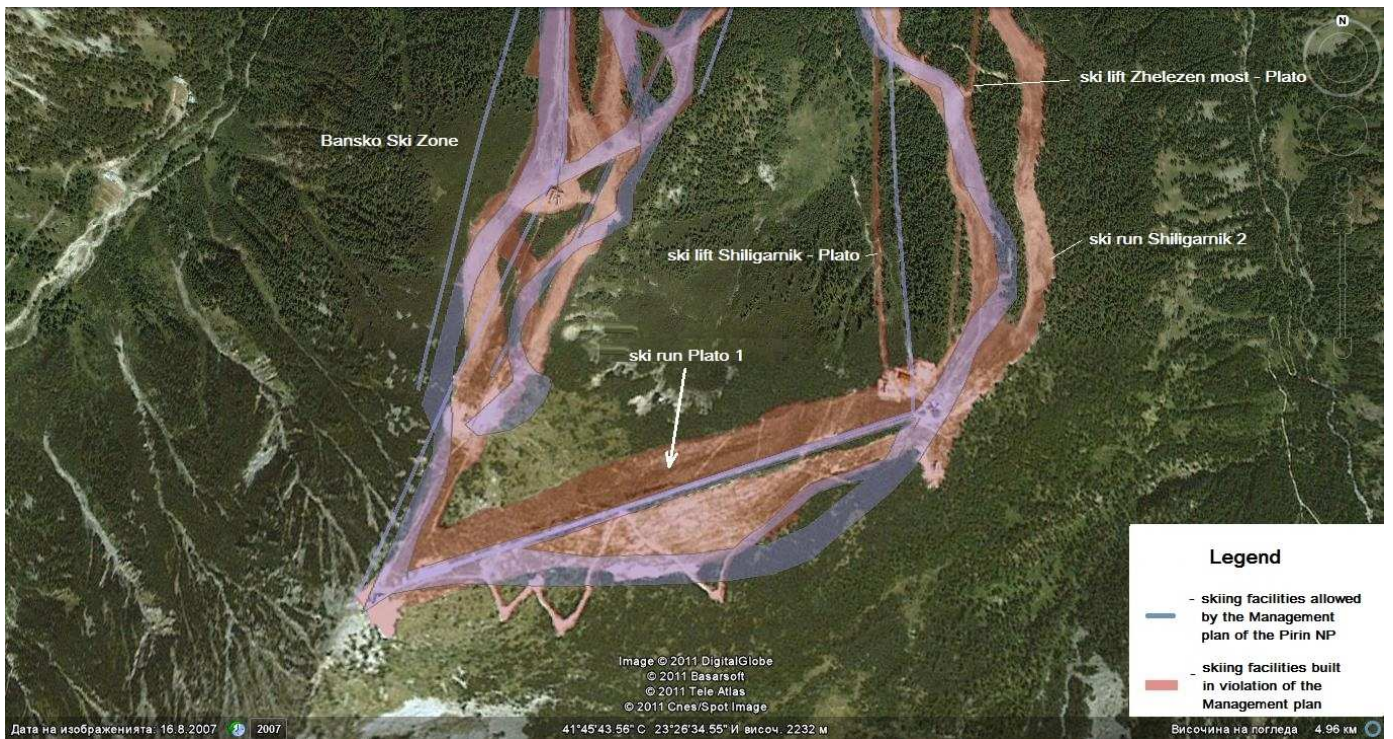


Fig. 3. Bansko ski-zone (Platoto site – Todorka peak)

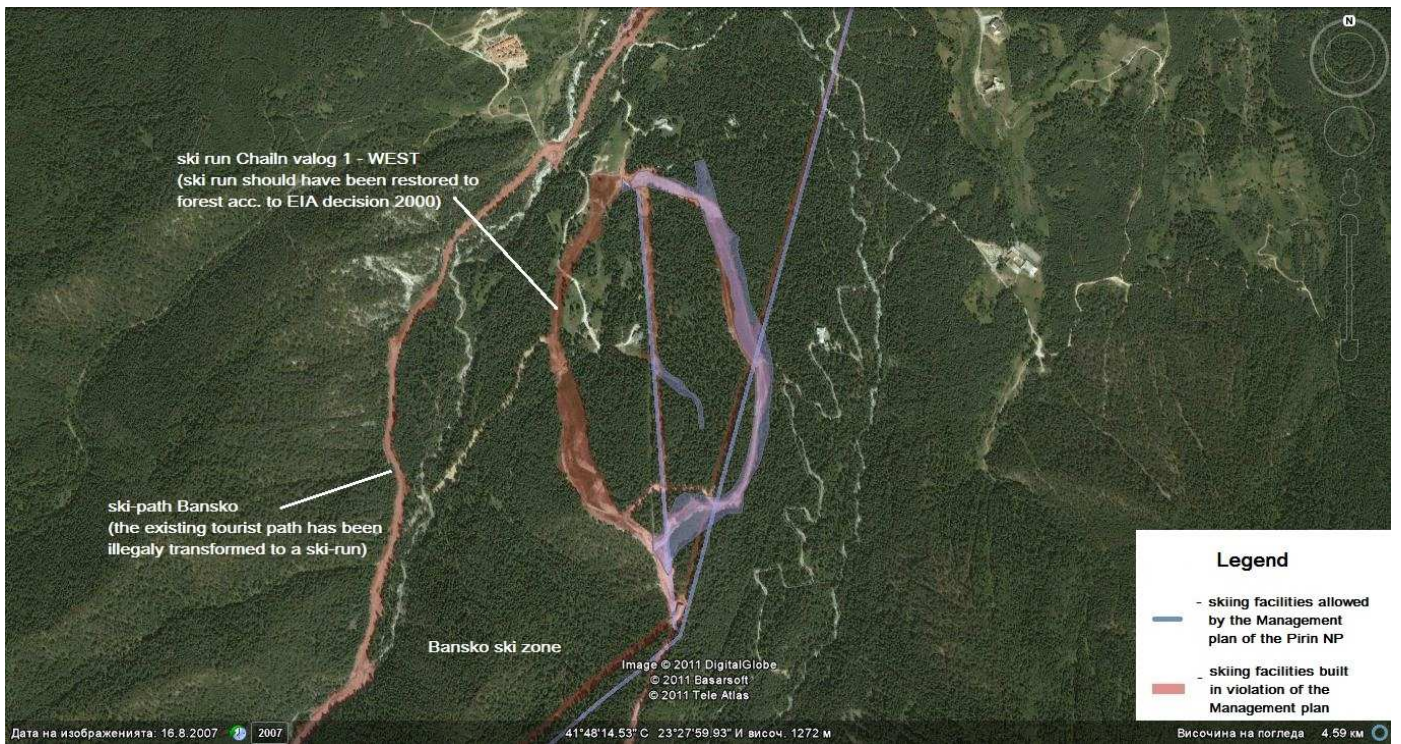


Fig. 4. Bansko ski-zone (Chalin valog site)

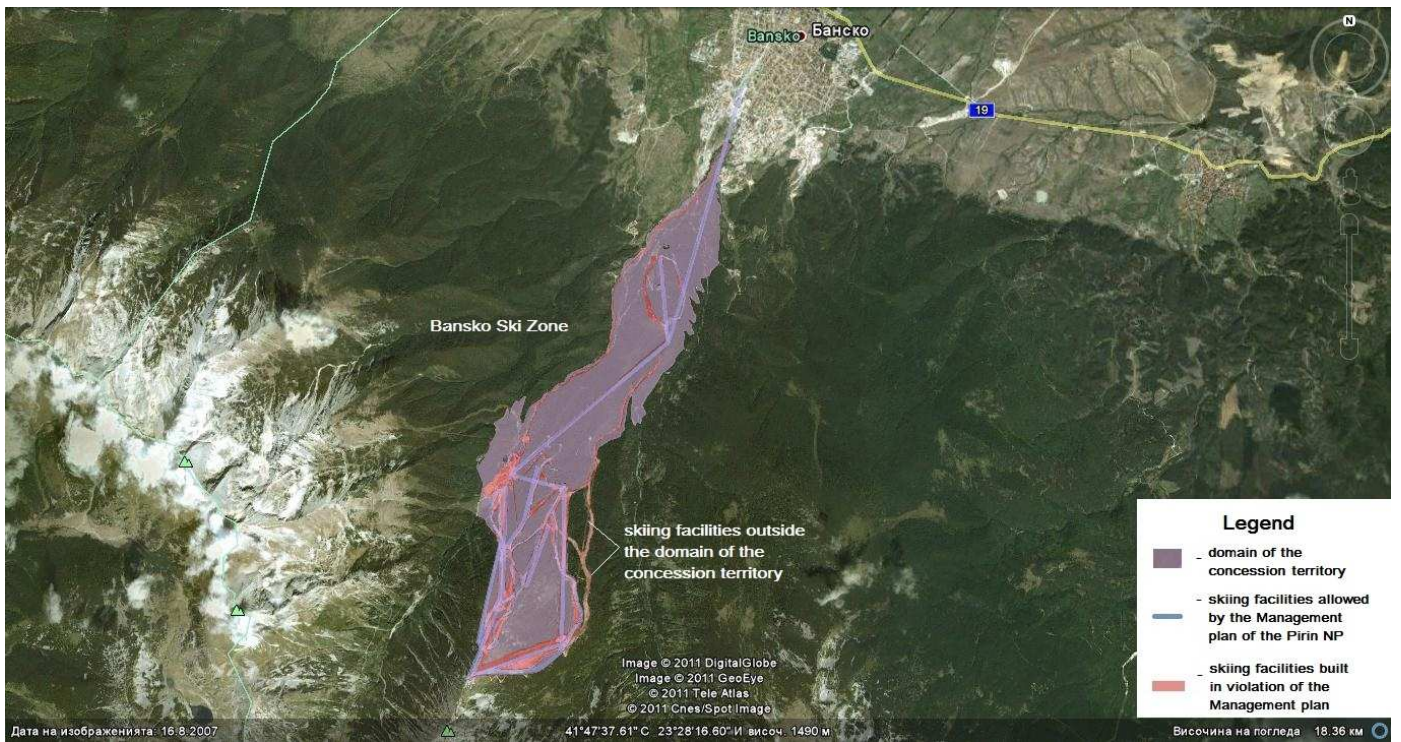


Fig. 5. Domain of the concession of the Bansko ski-zone



Fig. 6. Map of the Bansko ski-zone (Julen JSCo.)

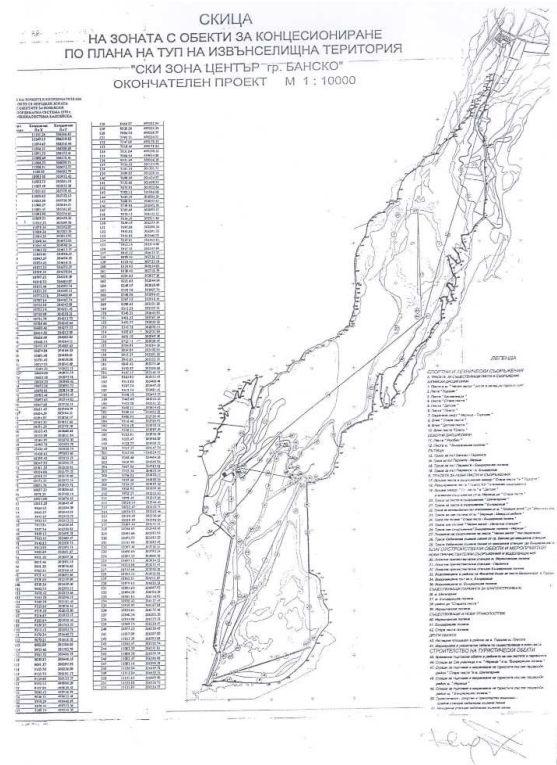


Fig. 7. Scheme of the concession



Fig. 8. Ski-run Shiligarnik 2 (No.12)



Fig. 9. Ski-run Tomba (No.9)



Fig. 10. Ski-run Shiligarnik 2 (No.12)



Fig. 11. Ski-run No.2 between Shiligarnik - Chalin valog



Fig. 12. Unplanned ski-run in the Chalin-valog site connecting the ski runs Chalin valog 1 and 2



Fig. 13. Ski-run Bansko (No.1)