

To: Lazare Eloundou Assomo
Director,
UNESCO World Heritage Centre
To Advisory Bodies: ICOMOS and IUCN
From: Aleksandra Koroleva
Ecodefense!
Dresden, Germany
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The Russian side is not making sufficient efforts to preserve the Curonian Spit (Site 994).

Statement by Ecodefense for the 48th session of the UNESCO World Heritage Committee

Dear Mr. Eloundou Assomo,

On behalf of the NGO Ecodefense, we are submitting to Your attention the information on very alarming developments at the Curonian Spit (World Heritage #994).

Russia habitually ignores international agreements and begins construction of a large resort, including an artificial island, at the Curonian Spit.

As You know, after the outbreak of the war in Ukraine and the breakdown of relations between the Lithuanian national park and the Russian Curonian Spit National Park, the status of the Curonian Spit World Heritage Site was greatly weakened, since joint management of the international site was no longer an option. If previously the parties prepared a joint report, which was then sent to the UNESCO World Heritage Committee, now both Lithuania and Russia send their own reports separately and, accordingly, practically do not know what is going on with their neighbors.

The Russian side is in no hurry to inform the Committee about various alarming events taking place in the Curonian Spit National Park: neither about the catastrophic destruction of the sea coast^{1,2}, nor about the extreme pollution of the Curonian Lagoon, nor, finally, about a new investment project for the construction of an artificial island.

In our opinion, the facts presented can significantly affect the Outstanding Universal Value of the property and its connection to other heritage areas.

On the territory of the Curonian Spit National Park in Russia ("Curonian Spit" World Heritage property #994) and in the adjacent waters of the Curonian Lagoon (the buffer zone of the "Curonian Spit" World Heritage property), construction of a recreational complex and a marine terminal is planned^{3,4}.

I. History of the project "Construction of an international passenger river crossing point, a protective pier, a hotel and recreational complex, and reconstruction of hydraulic structures in the village of Rybachy, Zelenograd Municipal District, Kaliningrad Region development"

In September 2023, information appeared about the investment project “Construction of an international passenger border checkpoint on the river, a protective pier, a hotel and recreational complex and reconstruction of hydroengineering facilities in the village of Rybachy, Zelenograd Municipal District of the Kaliningrad Region”⁵.

At the same time, in April 2023, when the EIA was not yet ready and, accordingly, an environmental assessment was not carried out, there was no construction permit, the implementation of the 1st stage of the project had already begun - the demolition of existing buildings on the land plot and clearing of the territory ^{4,6}.

As part of this project, it is planned to create an artificial land plot in the waters of the Curonian Lagoon adjacent to the Rybachy village. Rybachy village located within the boundaries of the World Heritage property, the adjacent waters are the buffer zone of the property. It is also planned to use land plots within the boundaries of the national park itself.

There is no mention in the project materials that the project will be implemented on the territory of a UNESCO World Heritage Site. There is no information in the project materials that the World Heritage Committee was properly notified of such a large-scale construction.

The only mention is in the expert's statement that the Curonian Spit is a UNESCO World Heritage Site is available only in the minutes of the meeting of the Scientific and Technical Council of the National Park dated November 15, 2022. The director of the Rybachy Ornithological Station of the Institute of Zoology (Russian Academy of Science-RAS) stated that “the concept does not take into account the authenticity of the Curonian Spit and violates cultural appearance of a World Heritage site”.⁴ The protocol was attached to the materials of the island construction project as an annex, but the statement was not reflected in any way in the project design.

According to the disclosed project documentation^{3,4}, by backfilling the territory and dredging in the coastal waters, an additional land plot will be created on an artificial island. The new 7.9 ha bulk area will be used for the construction of a 3-5-storey apartment hotel, a 5-storey apartment hotel, a 5-storey hotel, a hotel on the water, outdoor pools, 1-2-storey restaurants with terraces, covered parking and bus parking, offices of various services, emergency departments, shops, etc. According to the investor's plans, the height of the main facilities is up to 21 meters.

It is planned to build a marine terminal and port infrastructure, since the opening of an international maritime checkpoint is planned in Rybachy village.

It seems that this investment project, if implemented, will have a significant negative impact on the natural and cultural complexes of the World Heritage site.

“Preliminary ESIA” found in the abovementioned documents completely ignores requirements to heritage impact assessments and does not pay attention to conservation requirements for the World heritage property as such.

The investor announced a large-scale reconstruction of hydraulic facilities, “restoration of the coastal strip” by backfilling the soil, deepening the fairway in the bay, and cleaning the bay from silt and bottom sediments.

From the Draft Permit for the Creation of an Artificial Land Plot³ (section ‘Factors and circumstances that determined the need to create an artificial land plot’, p.3) it follows:

“2. The formation of a large amount of bottom soil during dredging in the inner waters of the bay chosen for the port will make it possible to restore the coastline and create the territory by backfilling”.

Further, in the “Environmental effect” section (p. 4) it is reported ‘3. The implementation of the Investment Project will make it possible to clean the internal waters of the bay from silt deposits (including carcinogenic ones), the formation of which is caused by unorganized discharge of untreated wastewater from domestic sewage into the waters of the Curonian Lagoon’.

In other words, the investor plans to build an island from soils extracted from the bottom of the bay, contaminated, in his own words, with toxic and possibly carcinogenic substances, and further in the EIA materials he states that the project will not cause significant harm to ecosystems. But this is not surprising, but the fact that the investor received support and has already started implementing the project.

As for the attitude of the administration of the Curonian Spit National Park, the agreement of intent for the implementation of an investment project was signed by the investor and park director Anatoly Kalina on May 5, 2022, immediately after the meeting of the Scientific and Technical Council of the National Park, held on April 28, 2022. Council members voted for implementation unanimously and without comments. At subsequent council meetings, individual proposals and comments were made, none of which were included in the project documentation.

The Project documentation was approved by experts and authorities despite the fact that among the possible types of impact on the environment is the irreversible alienation of part of the water area with disruption of the local hydroecosystem and damage to aquatic biological resources; temporary pollution of the aquatic environment with suspended substances, harmful impurities and pathogens from dumped soil with waste water; air pollution during the operation of road construction equipment and vehicles; noise impact during operation of technical equipment; pollution of surface and ground waters; littering the area with waste.

II. Environmental Impact Assessment of the Project

On April 22, 2026, the investor and the Ministry of Natural Resources of the Kaliningrad Region announced the start of public hearings on the Environmental Impact Assessment (EIA) for the project "Construction of an international passenger river crossing point, a protective pier, a hotel and recreational complex, and reconstruction of hydraulic structures in the village of Rybachy, Zelenograd Municipal District, Kaliningrad Region. Stage 1. Hydraulic structures, artificial land plot, and water area."

According to Russian law, public hearings are a mandatory step before project approval, and the minutes of the public hearings, along with the EIA, are submitted for environmental assessment.

The EIA materials, made publicly available⁷, represent a complex of contradictory statements that distort the expert assessments of ornithologists, hydrologists, geomorphologists, and ichthyologists.

The EIA materials make no mention of the large-scale construction planned on the territory of a UNESCO World Heritage site, nor of the World Heritage Committee having been informed accordingly.

The EIA materials do not assess the project's transboundary impact or its threat to the outstanding universal value of the natural monument, as required by Russian EIA regulations.

The EIA materials make no unsubstantiated claims that the project will not have a negative impact on the Neman River Delta and the Curonian Lagoon Key Bird Area (KBA Code: KG-001), located 23 km from the study area. The Neman River Delta and the Coast of the Curonian Bay are designated EU-RU002.

To facilitate the submission of the EIA materials for environmental review, the investment project "Construction of an international passenger river crossing point, a protective pier, a hotel and recreational complex, and reconstruction of hydraulic structures in the village of Rybachy, Zelenograd Municipal District, Kaliningrad Oblast" is deliberately divided into two phases. This is to avoid discussing the risks of high-rise construction for avifauna that arise during the second phase of the project (construction of high-rise hotels) and to facilitate the environmental review process.

The tourist cluster under construction will be located along the route of the major White Sea-Baltic migration route, which carries millions of birds. According to scientists, hotels up to 21 meters high will pose a risk of death for up to 15,000 migratory birds per day during the annual spring-autumn migrations.

Thus, the EIA materials include an expert opinion from the Zoological Institute of the Russian Academy of Sciences, which states that at least a third of all migratory birds fly at altitudes of less than 15 meters (the migratory flow of migratory birds numbers hundreds of thousands of individuals). The paradoxical conclusion is that the first phase of construction "will not have a significant impact on the region's avifauna." The investor commissioned scientists to study the avifauna in the future construction area, but the final results were unsatisfactory. According to Andrei Mukhin⁸, director of the Rybachy Biological Station, "the ornithological study data is distorted."

The EIA materials also include approvals issued by the Scientific and Technical Council of the Curonian Spit National Park (hereinafter referred to as the STC). It should be noted that the STC, not having the authority to approve investment activities, assumed these powers, replacing the state environmental assessment.

The EIA materials include minutes of the Scientific and Technical Council meetings (starting in 2022), which show that the Scientific and Technical Council has approved:

- measures to prevent negative impacts on aquatic biological resources during the dismantling of existing dilapidated buildings and preparation of the construction site in the Curonian Lagoon water protection zone;
- a concept for the long-term development of the territory (...) in the village of Rybachy, Kaliningrad Oblast;
- a concept for the development of the adjacent land plot;
- a presented methodology for the extraction and drainage of contaminated sludge deposits, with subsequent use in landscaping;
- a design for the creation of an artificial land plot;
- a draft schedule for the construction and reconstruction of hydraulic structures;
- a preliminary impact assessment on aquatic biological resources and damage calculations during work in the waters (...) of the Curonian Lagoon;
- activities related to the construction and reconstruction of hydraulic structures, restoration of the coastline, deepening of the fairway, cleaning of silt deposits and creation of an artificial land plot by backfilling with soils extracted during dredging operations in the inner waters of the bay. These dubious approvals are largely used to draw unfounded conclusions about the absence of risks and even the positive impact of the project "to create a comprehensive sustainable infrastructure for ecotourism and biodiversity conservation in the Curonian Spit National Park."

Finally, anticipating the environmental impact assessment, the authors of the EIA draw a frivolous and unsubstantiated conclusion: "The envisaged set of environmental protection measures is sufficient to minimize environmental damage. Overall, the work will not have a significant impact on the environment. The Project is acceptable from an environmental perspective."

After residents of the Kaliningrad region gained access to the EIA materials, a scandal erupted. Residents of the Kaliningrad region aptly nicknamed the project the "Wall of Death"

and expressed mass protests against the dangerous construction on the territory of a UNESCO World Heritage site. An online petition has been launched, with over 22,000 signatures from ordinary citizens already collected for an appeal to the Prosecutor General of the Russian Federation⁹.

To hush up the scandal, the investor withdrew the EIA on the trumped-up grounds of "technical errors in the EIA materials," and the Kaliningrad Region Ministry of Natural Resources canceled the public hearings¹⁰.

This "step back" does not mean abandoning the project, as the cooperation agreement on project implementation, signed between the investor and the Governor of the Kaliningrad Region on March 14, 2023, is valid until 2028.

According to the Operational Guidelines (paragraph 172), the World Heritage Committee invites the States Parties to the Convention to inform the Committee, through the Secretariat, of their intention to undertake or to authorize in an area protected under the Convention major restorations or new constructions which may affect the Outstanding Universal Value of the property. Notice should be given as soon as possible (for instance, before drafting basic documents for specific projects) and before making any decisions that would be difficult to reverse, so that the Committee may assist in seeking appropriate solutions to ensure that the Outstanding Universal Value of the property is fully preserved.

Therefore, according to established tradition^{11,12}, the responsibility to notify the UNESCO World Heritage Committee is assumed by Ecodefense.

In our view, proposed construction can lead to the destruction of unique natural ecosystems and cultural landscape, and therefore will negatively affect the Outstanding Universal Value of the property.

In accordance with §174 of the Operational Guidelines for the Implementation of the World Heritage Convention we request to verify our information.

III. Regarding the condition of the seacoast and the preservation of the foredune

A report by the Ministry of Natural Resources of the Russian Federation states that both traditional and modern coastal preservation methods are employed in the Curonian Spit National Park and that 76% of the seacoast remains in a stable condition.

We assert that the data provided by the Ministry of Natural Resources of the Russian Federation does not reflect reality:

1. No systematic work is being conducted on the Russian section of the Curonian Spit to preserve and restore the foredune—unlike the efforts undertaken on the Lithuanian section.
2. Traditional methods — such as laying brushwood — are organized haphazardly and implemented through sporadic initiatives involving untrained volunteers.



Volunteers are repairing a dune near the "Royal Forest" (Korolevsky Bor) tourist trail. March 15, 2023.
Source: Curonian Spit National Park website.



The result of volunteer work to repair the foredune near the "Korolevsky Bor" tourist trail. March 15, 2023.
Source: Curonian Spit National Park website.

3. The stone ridge constructed in 2024 north of the settlement of Lesnoye — measuring 350 m in length, 15–20 m in width, and 4 m in height—can hardly be classified as a modern coastal preservation method. Winter storms scattered the stones across the entire coastline. The stone ridge failed to save the foredune (which had previously been destroyed by tourists and storms).



Stone ridge as a modern coastal preservation method, Lesnoye settlement. July 2024.



Winter storms scattered the stones across the entire coastline. July 2025

4. The foredune is completely destroyed along the stretch from the start of the Curonian Spit (Zelenogradsk) to the settlement of Lesnoye; in other words, there is no foredune along this 12-kilometer section. This 12-kilometer stretch represents 24.4% of the total coastline belonging



to the Russian Federation.

The coast south of the settlement of Lesnoye.

5. Along the remaining stretch, the foredune is fragmented and in places destroyed, featuring numerous "wind gaps" (blowouts), particularly near settlements (Rybachy, Morskoye) and tourist routes. Because there are very few specially constructed crossings over the foredune on the Russian side (11 compared to 80 on the Lithuanian side), visitors trample numerous informal paths; these turn into wind gaps, allowing sand to encroach upon the forest.



Foredune and descent to the sea near the national park administration building (14th km of the Curonian Spit). 20.06.2026. Source: Curonian Spit National Park website

6. In 2020, Ecodefense prepared and submitted an extensive report¹² to the UNESCO World Heritage Committee titled "The Curonian Spit In Danger of Losing Its Outstanding Universal Value," presenting data on the condition of the Curonian Spit's foredune. A 22.6 km section stretching from Zelenogradsk to the ZIN RAS Biological Station was found to be in a catastrophic state. A 19.5 km section from the Biological Station to the settlement of Morskoye was in an unsatisfactory state. A 5.9 km section from Morskoye to the Lithuanian border was less prone to erosion, protected by a wide beach, and could be considered stable.

Thus, in 2020, only 12.3% of the coastline was in a satisfactory condition, while the remainder was in unsatisfactory or critical condition.

<https://ecodefense.ru/wp-content/uploads/2020/12/report-on-world-heritage-property-no.-994-curonian-spit.pdf>

7. Following a series of winter storms in 2022, the survey was repeated in July 2022; specifically, 70 unauthorized access paths to the sea—terminating in blowout depressions—were identified along a 2-km stretch southwest of the settlement of Lesnoye. Although there is no designated beach access near the popular "Fringilla" tourist route, the sheer volume of

visitors has worn numerous footpaths that merge into a wide sandy track before reaching the foredune, while the foredune itself is breached by wide wind-scoured gaps.

A severely damaged foredune near the "Fringilla" tourist trail. Attempts by volunteers to repair



such a blowout have yielded no results. April 19, 2024. Source: Curonian Spit National Park website.



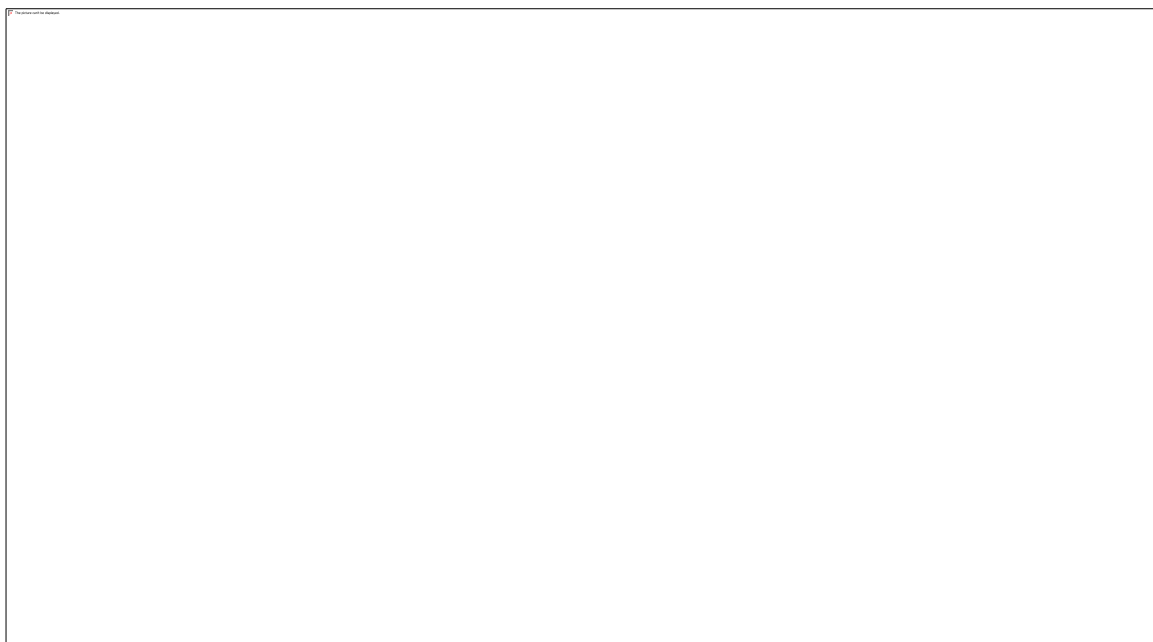
The same place in July 2026. Private photo.

8. On November 27, 2024, staff from the national park and the Kaliningrad Region State Budgetary Institution "Baltberegozashchita" jointly surveyed the first 14 kilometers of the Curonian Spit's coastline and determined that the section extending from Zelenogradsk to the 14-kilometer mark is subject to erosion.



27.11.2024. Source: Curonian Spit National Park website.

9. Photographs taken between 2024 and 2026 across various sections of the Curonian Spit (from Zelenogradsk to the state border with Lithuania) reveal a degraded foredune and the consequences of clearly inadequate, unsystematic preservation and restoration efforts.



The result of volunteer work to repair the foredune near the "Korolevsky Bor" April 19, 2024. Source: Curonian Spit National Park website.



Wind gap in the foredune at the base of the Curonian Spit. July 2026. Private photo



The Russian State Party, due to the urgent risk of universal value disruption, to instantly carry out an assessment of the condition of the foredune, to identify, on the basis of the assessment, the most dangerous and critical areas, to develop urgent restoration measures, and to proceed with restoration activities in the next season (during the winter storms restoration and repair activities are not economically feasible).

Yours respectfully,

Aleksandra Koroleva, Ecodefense!

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