



INTERNATIONAL COUNCIL ON MONUMENTS AND SITES - BULGARIAN NATIONAL COMMITTEE
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES - COMITÉ NATIONAL BULGARE
МЕЖДУНАРОДЕН СЪВЕТ ЗА ПАМЕТНИЦИТЕ НА КУЛТУРАТА И ЗАБЕЛЕЖИТЕЛНИТЕ МЕСТА-
БЪЛГАРСКИ НАЦИОНАЛЕН КОМИТЕТ

To:
ICOMOS Secretariat
11 rue du Séminaire de Conflans
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by email: secretariat@icomos.org

05 June 2018

Dear colleagues,

In response to your message from May 28, 2018 and the forwarded letter entitled *The Bulgarian Government plans to ruin a European archaeological heritage near Blagoevgrad - we need help to preserve this cultural site!* by Mr. Daniel Dimov on behalf a Facebook Group "We are against the construction of the archaeological site around Blagoevgrad", we would like to affirm that ICOMOS-Bulgaria highly estimates the deep concern demonstrated by a local community in Blagoevgrad and their active position in defense cultural heritage.

Although ICOMOS-Bulgaria has not been officially informed on the case of *Struma* Highway and the above mentioned archeological findings and no member of ICOMOS-Bulgaria has been involved in the commissions appointed to address the situation, after contacting the national institutions responsible for the cultural heritage preservation in the country and the expert institutions involved, ICOMOS-Bulgaria confirms that all the action undertaken by Bulgarian government and the institutions has been in line with the national legislation and the established professional practice in the country.

As the whole region of Bulgaria is one of abundant and valuable archaeology dated back to the Crit-Mycenaean era, the current very intensive construction of national road infrastructure has strictly followed professional rules and procedures for archeological excavations and for the estimation of archeological findings. After an initial planning the highway route, on-site investigation for the identification of the known and new archeological findings is obligatory.

The currently constructed *Struma* Highway largely coincides with an ancient route along which numerous cultural monuments from different historic periods are present – most of them of great historic value, well preserved and with well-known locations. The lack of funding for archaeological site surveys is a lasting challenge to needed further investigations and exposure of cultural heritage.

The overall long-term archeological investigations along the planned route of the *Struma* Highway have been undertaken under a contract between the National Archeological Institute with Museum at the Bulgarian Academy of Sciences (NAIM-BAS) and the National Agency for Road Infrastructure. According to the contract the investigations should be finalized by July 31, 2018. Only after the closure of the field surveys a specialized commission will be convened to formulate a final decision on further action concerning the archeological findings (Article 158, Cultural Heritage Act).

Although the on-site investigations are still going on, the preliminary estimations of contacted expert archeologists working there, the hypothesis that the findings are part of the ancient settlement of *Skaptopara* or its periphery has not been confirmed till present; the findings are rather estimated to be part of a roadside camp with perishable stonework, one of the numerous such structures in the region; several scattered buildings have been identified - a small temple, a bath and some burials.

Responding to the concerns and protests of the local community, a working group headed by the Prime Minister and including the Ministers of Culture, of Regional Development, of Transport and of Finance, as well as relevant preservation and construction experts have visited the site on May 3, 2018 and discussed the issues with local people. Following Ordinance of the Council of Ministers from May 4, 2018, a specialized Commission of seven experts was appointed on May 9th, 2018, which was headed by the Chief Inspector on cultural heritage protection at the Ministry of Culture and also comprised two experts from Bulgarian Academy of Sciences, two experts from the Ministry of Culture and two experts from the National Institute for Immobile Cultural Heritage.

Although the archaeological site discussed in the message is neither an enlisted world heritage site, nor located in proximity to any such site in Bulgaria, ICOMOS-Bulgaria will be carefully following all future development of the case and will support political and professional action aimed at protecting the cultural monument in the most appropriate way that would integrate considerations of high-quality heritage preservation as a fundamental resource for sustainable regional development.

On behalf of ICOMOS-Bulgaria,

Sincerely,

Gabriela Semova-Koleva
President

Prof. Margarita Vaklinova
Archeologist

Dr. Elena Dimitrova
Vice President