



Mr. Lazare Eloundou Assomo  
Director of World Heritage  
UNESCO World Heritage Centre  
7, Place de Fontenoy  
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France

Harlingen, 28th February 2024

Kenmerk: WV/WvdH/FP/24009

Re: *State of Conservation Report for the Wadden Sea World Heritage Site: Trilateral Response of the Nature NGOs*

Dear Mr. Eloundou Assomo,

Thank you for your letter from 2<sup>nd</sup> February reassuring us that our concerns for the critical status of the Wadden Sea World Heritage Site are being heard and acted upon. We, a network of environmental NGOs from Denmark, Germany and The Netherlands taking care of the Wadden Sea, appreciate the opportunity to continue to contribute critical information to this process to allow for a thorough examination at the 46<sup>th</sup> session of the World Heritage Committee in July 2024. Our motivation is to encourage the three State Parties to do what is necessary to better safeguard the Wadden Sea and its Outstanding Universal Value (OUV). Our intention is not for the site to lose its status!

With this in mind, we would herewith like to point to relevant information that we believe is missing or misinterpreted in the State of Conservation (SoC) report, which Denmark, Germany and The Netherlands have submitted to you on 14<sup>th</sup> February 2024, in line with UNESCO WHC Decision 45 COM 7B.23<sup>1</sup> concerning the Wadden Sea. While we are grateful to those who have compiled the information that is contained in the SoC report, we want to highlight gaps and misrepresentations in particular for large energy and infrastructure projects, which have the potential to severely damage the OUV.

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<sup>1</sup> See <https://whc.unesco.org/archive/2023/whc23-45com-7B.Add2-en.pdf> (Wadden Sea on pp 38-43).

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Below, and in more detail in the Annex, we have elaborated on the projects with the highest potential damage. In addition, there are new reports illustrating that the Wadden Sea could already be “at risk” and is inadequately protected via Natura 2000 and other international legal instruments<sup>2</sup>. We feel that the extent to which nature legislation is being weakened and energy/infrastructure projects are being developed is high – taken together these are putting the OUV in jeopardy. With this letter we would therefore like to immediately respond to the SoC report to avert any further damage to the Wadden Sea.

Judging from the response of the State Parties in the SoC report, we feel that several of the critical mandates in Decision 45 COM 7B.23 are being ignored by the three State Parties. First and foremost, three new fossil fuel projects underneath or close to the Wadden Sea within their national boundaries have not yet been put on halt (i.e. ‘Ternaard’ in The Netherlands, an extension of ‘Mittelplate’ in Germany, and ‘GEMS’ close to the Wadden Sea at the Dutch-German maritime border) despite the strong mandate in paragraphs 5 to 9. A terminal for Liquefied Natural Gas (LNG) that has failed the Environmental Impact Assessment in Australia, has been installed in Germany with serious consequences for the ecology of the Wadden Sea. New large-scale projects such as the mass dumping of polluted sediment from Hamburg harbour in locations very close to the Wadden Sea are going through routine permitting procedures. Overall, the level of dredging and sediment dumping from ports and for the access to ports across the Wadden Sea has become unsustainably high, linked to a trend towards ever increasing vessel size. The number of large high voltage cables which cross and thereby damage the Wadden Sea, and the associated construction sites, has grown dramatically as a result of offshore wind expansion in the North Sea. Many more projects are on the horizon, including hydrogen pipelines and possibly even a pipeline for carbon capture and storage (CCS).

Regarding the fossil fuel projects, we are calling for a complete ban in order to comply with the protection of the Wadden Sea World Heritage and to protect the climate. Regarding renewables it is critical to choose the location of cables and associated infrastructure wisely, to bundle these into as few corridors as possible, and to install these in a nature-friendly manner (e.g. timing, techniques). For the remaining environmental impact we need real and nature-positive compensation. Ultimately

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<sup>2</sup> Further information was sent to UNESCO WHC by a coalition of trilateral environmental NGOs on 18<sup>th</sup> December 2023 (<https://provinciegroningen.bestuurlijkeinformatie.nl/Agenda/Document/29f82808-fe2e-4098-a44a-7030129e4478?documentId=f8ee59d-3a38-4021-847f-f23e2d0df520&agendaltemId=6c41ed85-3905-458f-85d9-5775550ca48e>).



every effort must be made to both safeguard the OUV and to transform the energy sector towards climate neutrality.

The SoC report fails to adequately inform the World Heritage Centre about the status quo and does not illustrate the full scale of planned infrastructure deployment and repowering, notably of offshore wind, for decades to come. Guidance on urgently needed action is missing in the SoC report. Given that the majority of our suggestions that we submitted during the stakeholder consultation in January 2024 were not incorporated into the SoC report, we would like to alert you to these omissions (see Annex, which is the final SoC report with our main comments and suggestions).

We hope and expect that the three State Parties will not continue to neglect decisions and suggestions taken under the WHC and indeed other international law. The current conduct may not only cause deterioration of the OUV of the Wadden Sea, it also deteriorates the confidence we all want to have in governments delivering on international agreements that we have nationally committed ourselves to.

On a positive note, we greatly appreciate the decision by Denmark to stop the plans to build an industrial test centre for wind energy with turbines of 450 m height close to the property near Ballum Enge. This was in response to the need to safeguard the Wadden Sea World Heritage and to stakeholder opposition. While Denmark should never have put forward such a plan in the first place, this is the kind of commitment towards the implementation of the World Heritage Convention we wish to see across the region: to safeguard the Wadden Sea as an international jewel for nature and future generations.

Yours sincerely,

Wouter van der Heij, (acting) director Waddenvereniging

Annex: SoC report by as submitted by State Parties with comments and suggestions by Nature NGOs in blue colour

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Also on behalf of:

Germany

BI "Rettet das CUX-Watt", mr. Peter Roland (Vorsitzender)  
Biologische Schutzgemeinschaft Hunte Weser-Ems e.V., mrs. Christiane Lehmkuhl  
(Geschäftsführende Vorsitzende)  
Bund Umwelt- und Naturschutz Deutschland e.V. (BUND), mr. Matthias Meißner (Abteilungsleiter  
Biodiversität)  
Bürgerinitiative gegen CO2-Endlager e.V., Dr. Reinhard Knof  
Bürgerinitiative Saubere Luft Ostfriesland e.V., mrs. Sandra Koch  
Der Mellumrat e.V., mr. Mathias Heckroth (Geschäftsführer)  
Deutsche Umwelthilfe (DUH), mr. Sascha Müller-Kraenner (Bundesgeschäftsführer)  
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Olomski  
Initiative "Wattenmeer-Schutz Cuxhaven", mrs. Tanja Schlampp (Vorsitzende)  
Naturschutzbund Deutschland (NABU), mr. Leif Miller (CEO)  
Schutzstation Wattenmeer e.V., mr. Björn Marten Philipps (Geschäftsführer)  
Verein Jordsand zum Schutz der Seevögel und der Natur e.V., Dr. Steffen Gruber (Geschäftsführer)  
World Heritage Watch, mr. Stephan Doempke (Chair)  
WWF Deutschland, Dr. Hans-Ulrich Rösner (Leiter Wattenmeerbüro)

Denmark

Danmarks Naturfredningsforening, mr. Henning Mørk Jørgensen  
Dansk Ornitologisk Forening (DOF), mr. Marco Brodde

Netherlands

It Fryske Gea, mr. Henk de Vries (director)  
Natuurmonumenten, mrs. Jorien Bakker (Public Affairs Wadden Sea)  
Stichting Groninger Landschap, mr. Marco Glastra (director)  
Stichting Sportvisserij Nederland, mr. David Vertegaal (public affairs)  
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