

## Nomads in ‘no man’s land’:

*China’s nomination for UNESCO World heritage risks imperilling Tibetans and wildlife*

International Campaign for Tibet - June 30, 2017

### Executive Summary

The Chinese government is seeking UNESCO World Heritage status for a vast area in Tibet of lakes, wetlands and wildlife, due to be decided at a meeting of the World Heritage Committee in Krakow, Poland from July 2. The plans threaten to erode protection of this fragile river source area because they involve removal and exclusion of Tibetan nomads, who have traditionally protected the landscape and its wildlife.

The approximately 60,000 km<sup>2</sup> area, known as Hoh Xil, or Kekexili in Chinese and Achen Gangyap in Tibetan<sup>[1]</sup>, is in the middle of three major nature reserves that increasingly exclude normal Tibetan land use such as nomadic herding, situate the state as the sole agency of control, and encourage mass tourism.

The People’s Republic of China describes Hoh Xil, a vast area twice the size of Belgium, as ‘no man’s land’. But Tibetan pastoralists have made skillful use of the dry landscape here and across the plateau for centuries, co-existing peacefully with wildlife and protecting the land. The involvement of Tibetans – and nomads in particular – as stewards is essential to sustaining the long-term health of the ecosystems, and the water resources that China and Asia depend upon. Excluding them is inconsistent with UNESCO and International Union for the Conservation of Nature (IUCN) guidelines, which seek to ensure that the rights of local and indigenous people are respected.



Tibetan pastoralists have made skillful use of the dry landscape of the Tibetan plateau for centuries, co-existing peacefully with wildlife and protecting the land. The involvement of Tibetans – and nomads in particular – as stewards is essential to sustaining the long-term health of the ecosystems, and the water resources that China and Asia depend upon. (Image: Diane Barker, Instagram: Heartofasia108)

Serious concerns about China’s nomination for World Heritage, including its exclusion of herders and the dangers to wildlife presented by an engineering corridor that runs through the area, were raised by a scientific evaluation team that travelled to Hoh Xil last year to carry out an official mission for UNESCO. The mission, carried out by IUCN, admitted that local people had expressed concern to them about relocations – a significant acknowledgement, given the dangers faced by Tibetans or local Chinese people who dare to raise even moderate concern about projects prioritised by the Beijing leadership. The Chinese government does not allow Tibetans or other ‘ethnic minorities’ to express views that are different to those of the Party state.

But in a conclusion that appears inconsistent with the substance of the report, IUCN concluded that the nomination should still be approved.

Concerns about the nomination before UNESCO on July 2 are summarized as follows:

- China’s official nomination proposal requires UNESCO World Heritage Committee members to accept a framework that specifically labels traditional pastoral land-use a threat, involving the criminalization of traditional productive and sustainable activities as pastoralism and gathering medicinal herbs. Approving this nomination without addressing the concerns relating to Tibetan nomads as well as wildlife, would set a precedent of international endorsement for China’s massive state-engineering policies, including the removal of Tibetan nomads from their lands that are reshaping the landscape of the world’s highest and largest plateau.

- China's proposed management plan undermines the efforts of Tibetans in these remote areas of the high plateau to protect wildlife, including the iconic species used by Beijing as its mascot for the 2008 Olympics, the 'tsö', or Tibetan antelope ('chiru'). The nomination by the Chinese government does not include their full migratory range, for a species whose pregnant females travel great distances to give birth safe from predators across provincial boundaries beyond Qinghai, in both Xinjiang and Tibet Autonomous Region.
- A major engineering corridor – a railway, highway, ultra-high voltage grid, optical fibre cabling and oil pipeline – traverses Hoh Xil from north to south. China has carefully defined the boundaries of its bid for UNESCO World Heritage to specifically exclude this 'Qinghai-Tibet Engineering Corridor', meaning that UNESCO would have no authority to argue against intensified development in this specific area. Antelopes also face potential danger in seeking to cross the engineering corridor without protection, which was acknowledged by the official World Heritage mission to the plateau.

This is not the first time China has excluded economic production zones from the heart of 'protected areas' in Tibet that have been given UNESCO's approval and brand equity. In the "Three Parallel Rivers" protected area of Yunnan, given World Heritage status in 2002, the actual rivers were excluded from the defined protected area, which has allowed China to now proceed with hydro dam construction, power grid construction and other development – resulting in a decline in wildlife population and difficulties for the local Tibetan population. Concern about the outcomes in the "Three Parallel Rivers" area is due to be discussed at Krakow in July (2017), but as the nomination is already inscribed, the World Heritage Committee has limited leverage over China carrying out its ambitious and elaborate plans.

In Krakow next week the International Campaign for Tibet (ICT) will recommend the following to the World Heritage Committee:

- The inscription of Hoh Xil should be deferred pending a detailed assessment involving stakeholders and experts, consistent with UNESCO guidelines. The traditional nomadic life of Tibetans must be respected and guaranteed as a precondition for the inscription, with a land use plan that establishes the right of Tibetans to graze their animals.
- The UNESCO evaluation details a number of sacred and cultural sites in the area while the property is defined only as 'natural' landscape. A detailed mapping of such sites should be carried out in order to establish whether more comprehensive protection is required, recognizing Hoh Xil for its cultural as well as natural significance, which would be inconsistent with removing Tibetans from the land and excluding them from the decision-making process.

China's bid for UNESCO status coincides with the news that it is considering turning a vast area of the Qinghai-Tibetan plateau into a huge national park as it embarks upon the largest scientific study of Tibet so far conducted. While at face value this appears to be a positive development, it raises serious questions about the survival of Tibetan nomadic pastoralism and risks excluding Tibetans still further as responsible stewards of wildlife and the landscape.

This special report outlines the implications of China's bid for UNESCO World Heritage status, showing how it is inconsistent with UNESCO guidelines on the involvement of local and indigenous people with decision-making on heritage and land use, in the context of the significant and emerging trend of China's creation of nature reserves across Tibet.

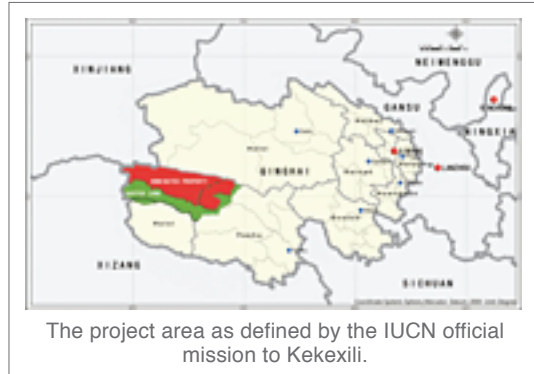


The UNESCO mission noted many cultural and sacred sites in the Hoh Xil area. The nomadic tradition of one of the richest spiritual cultures in the world must be respected and indeed honoured – Tibetans have preserved the natural and cultural heritage of their homeland to a degree that allows it to be considered as World Heritage in the first place. This image depicts a Tibetan on the plateau praying at a typical stupa with mani stones inscribed with mantras. (Image: Diane Barker)

## China's nomination for UNESCO status at the earth's Third Pole

The nomination before UNESCO is for the 37,356 km<sup>2</sup> Hoh Xil<sup>[2]</sup> nature reserve with a 22,909 square kilometer<sup>[3]</sup> buffer zone, encompassing part of the vast Sanjiangyuan nature reserve, source of the headwaters of the great Yellow, Yangtze and Mekong rivers. Hoh Xil is located in Yulshul (Chinese: Yushu) Tibetan Autonomous Prefecture in Qinghai province incorporating Drito (Chinese: Zhidoi) and Chumarleb (Chinese: Qumalai or Qumarleb) counties.<sup>[4]</sup>

Known as the earth's 'third pole' because it has the largest reserves of fresh water outside the Arctic and Antarctic, the Tibetan plateau is the source of most of Asia's major rivers and, particularly given northern China's water scarcity, of critical strategic significance to the People's Republic of China (PRC).<sup>[5]</sup> The Hoh Xil, Sanjiangyuan and Changtang (Chinese: Qiangtang) nature reserves stretch across the TAR and Qinghai, from stony deserts in the far west to pastureland in the east, from low to high population density, from an area of lakes to the headwaters of three of Asia's greatest rivers. If Hoh Xil gains World Heritage status, China will be well positioned to then nominate the contiguous nature reserves on either side in their entirety.



The Chinese authorities describe Hoh Xil as 'no man's land', which provides a justification for them to claim that no evaluation needs to be made by an outside organisation with regard to human beings and therefore human rights. But Tibetan pastoralists have long co-existed peacefully for centuries with wildlife, protecting the land and its species, and a central principle of UNESCO World Heritage is that the rights of local and indigenous people are respected.

To set this characterization in context, official policies in the PRC of confiscating pastoral land and displacing nomads, which give the authorities greater administrative control over people's movements and lifestyles, mean that since 1999-2000, tens of thousands of Tibetan pastoralists have been compelled to slaughter their livestock and move into newly built housing colonies in or near towns, abandoning their traditional way of life.

Not only are these policies threatening one of the world's last systems of sustainable pastoralism, but scientific evidence shows that these policies are threatening the survival of the rangelands and Tibet's biodiversity. Indeed, there is a consensus even among scientists and rangelands experts in the PRC that settling nomads runs counter to the latest scientific evidence on lessening the impact of grasslands degradation, which points to the need for livestock mobility in ensuring the health of the rangelands and mitigating negative warming impacts.<sup>[6]</sup>

Tibetan mobile pastoralism and migratory wild herds such as the Tibetan antelope co-existed for thousands of years, with Tibetans playing a key role in protecting the rich wildlife of Hoh Xil and surrounding areas, including Tibetan antelopes, snow leopards, bears and wild yaks. While China proclaims itself the protector of the Tibetan antelopes, under China's control their number plunged from one million to as few as 65,000-72,500 by the mid-1990s, according to the IUCN and other sources.<sup>[7]</sup> They were protected only by the Tibetan nomads of and nearby pastures risking – and losing – their lives to protect the tsö antelopes from the slaughter of hunters making fortunes from their downy underfur. This was documented in the popular movie, 'Kekexili: Mountain Patrol'.<sup>[8]</sup>

China's current land use policies create further dangers for wildlife – the habitat and mobility of Tibetan antelopes have been threatened in recent years by large-scale poaching and fencing off the grasslands as part of settlement policy outlined above.<sup>[9]</sup>



China's current land use policies create further dangers for wildlife – the habitat and mobility of Tibetan antelopes have been threatened in recent years by large-scale poaching and fencing off the grasslands as part of settlement policy. (Image: ICT)

Despite the evidence and scientific consensus, the Chinese government seeks to convey the impression that the creation of nature reserves and removal of nomads from the land has the aim of environmental protection and conservation, even climate change mitigation, although the opposite is the case.

China's official nomination proposal requires UNESCO Committee members to accept a framework that specifically labels traditional pastoral land use a threat. Its application for UNESCO status states: "Human activities such as harvesting, hunting, herding, road building and urban construction still impose negative impacts on nature; the affected ecosystems and wildlife habitats can't recover fast enough."<sup>[10]</sup> Official hostility to Tibetan nomadic practices is explicit in the application: "Grazing, in particular, threatens the existence of the pristine ecology and wildlife in the core zone. Grazing can deteriorate wildlife habitat and competes with wildlife for land."<sup>[11]</sup>

It is further indicative that the nomination for UNESCO World Heritage status is made under the administrative authority of China's Ministry of Housing and Urban Development – not by a conservation or environmental protection ministry.<sup>[12]</sup>

China's regulations on nature reserves allow for the presence of tourists and state security police, while banning nomads. Regulations specifying relocation of Tibetans from core areas are set out in Chinese law, while another article of the same law states: "*The public security organ of the region where the nature reserves are located may set up its dispatched agency within the nature reserves to maintain public security if necessary.*"<sup>[13]</sup>

## 'Cutting the lifeblood of the people'

Hoh Xil was among the first substantial portions of the Tibetan plateau in Qinghai to be formally set aside for 'conservation' by the Chinese authorities, which excludes grazing and human use under regulations set in the 1990s – despite the consensus among experts that the traditional ecosystem knowledge of nomadic pastoralists protects the land and livelihoods and helps restore areas already degraded.<sup>[14]</sup>

Tibet specialist Gabriel Lafitte, who has researched this issue in detail for his blog, "rukor.org", says: "Everything China says denies the ongoing Tibetan human presence in Hoh Xil, and long history of Tibetans sustainably curating the land. The danger with the UNESCO proposal lies in the acceptance of a framework presented by the scientists who have written this nomination, in which Hoh Xil is all about tectonic evolution, geology, petrology, geochemistry, biology, botany and zoology. These are the focus of the 188 pages of China's application, while at every turn denying a contemporary human presence."<sup>[15]</sup>



Tibetan pastoralists have made skillful use of the dry landscape of the Tibetan plateau for centuries, co-existing peacefully with wildlife and protecting the land. The involvement of Tibetans – and nomads in particular – as stewards is essential to sustaining the long-term health of the ecosystems, and the water resources that China and Asia depend upon. (Image: Diane Barker, Instagram: Heartofasia108)

A number of Tibetans who have set fire to themselves and died in the wave of self-immolations that has swept Tibet since 2009 are either nomads or from a nomadic background, indicating a growing distress that has become apparent as a result of dispossession and increasing poverty among other impacts.<sup>[16]</sup>

ICT has documented these outcomes in numerous reports. In one vivid account, a Tibetan nomad from the same prefecture as the nominated World Heritage property, Yushu, described the daily difficulties faced as a result of Chinese policies, saying: "A few years ago, the Chinese government implemented a policy called 'Retreating from the Pastures to Bring the Grass Back'. Many herdsmen had to abandon grasslands and pastures, and move into towns to settle down. These herders initially had some fantastic dreams. They thought that it would be wonderful to live in the town. They felt that livestock were burdensome and life would be better without them. [...] Now they don't have the money to purchase meat, butter, yogurt and milk. They don't have tents and yak dung for fuel any more. In the new concrete house, they have to burn the high priced coal briquettes, but the price for the briquettes is too high for them to purchase. [...] People can't even afford food, and their formerly bulging bellies have started to flatten. Some policies of the Chinese government are cut by a sword to make 'one size that fits all.' These bureaucrats bring policies implemented in the streets of Beijing to our grasslands. [...] In fact, 'Retreating from the Pastures to Bring the Grass Back' is not working in Tibetan pastoral areas, and it has cut off the lifeblood of the people."<sup>[17]</sup>

*“It is the area with the highest concentration of lakes on this Plateau, exhibiting an exceptional diversity of lake basins and inland lacustrine landscapes at high altitude. The very large scale of the area and its substantially natural conditions create an area with exceptional natural beauty, whose aesthetic values are related to the experience of wild nature. The high plateau systems function unimpeded on a grand scale, wildlife is vividly juxtaposed against vast treeless backdrops, and tiny cushion plants contrast against towering snow covered mountains. In the summer, the tiny cushion plants form a sea of vegetation, which when blooming creates waves of different colours. Glacial melt waters create numerous braided rivers which are woven into huge wetland systems forming tens of thousands of lakes. The lakes display a full spectrum of succession stages, forming an important catchment at the source of the Yangtze River and a spectacular landscape. The geographical and climatic conditions nurture a similarly unique biodiversity.”*

– Technical evaluation report on the proposed UNESCO World Heritage site of Hoh Xil by IUCN, May 2017<sup>[18]</sup>

## Nomads in ‘no man’s land’

According to IUCN’s mission for UNESCO, the Chinese government stated “unequivocally” that “there will be no forced relocation or exclusion of the traditional users of the nominated site, whether before or after succeeding in the application for World Heritage site.” This contradicts indications that China has already removed most Tibetan nomads from the area, prior to making its World Heritage bid. The IUCN report also makes it clear that the Chinese state party will remove the rest and seek to move those remaining into different types of work.

The ethos of the policy of settling nomads is to create conditions that will encourage poor rural workers to towns or cities, where they will apparently become workers and consumers in a new, ‘modern’, economy and where the authorities have greater administrative control over people’s movements and lifestyles. Resettlement policies are generally implemented without consultation or consent, and local people have no right to challenge them or refuse to participate. The distinction between coercion and consent to nomad settlement is meaningless in the political climate in Tibet today. This is despite the fact that Chinese law requires that those who are to be moved off their land or are to have their property confiscated must be consulted, and, if they are moved, compensated for their losses.<sup>[19]</sup>



These images show featureless lines of nomad settlement dwellings in the Golmud area of Qinghai, built after the railway was extended from Golmud to Lhasa. Many nomads were removed from their land to be settled here.

Under massive Chinese state engineering policies, many Tibetan nomads from Hoh Xil and adjoining river source areas have already been removed from their land to urban areas including the petrochemical and industrial center of Gormo (Chinese: Golmud) in Qinghai, where they live in concrete compounds facing increasing difficulties, lacking skills or language ability to compete with Chinese workers, and leading to increasing poverty, environmental degradation and social breakdown.

China’s President and Party Secretary Xi Jinping made a visit to a large nomad settlement during a visit to Qinghai in September (2016), and was photographed in the state media meeting Tibetan villagers who had moved from the Sanjiangyuan river source area in 2004.<sup>[20]</sup> Tibetan areas of Qinghai have led the way in terms of fencing and sedenterization in the massive social engineering campaign underway in Tibet to displace nomads from the vast grasslands.

This important development of the removal of nomads prior to the World Heritage bid does not appear to have been noticed by IUCN in its report to the UNESCO Committee, although the IUCN experts who visited the region did notice that grazing pressure has been reduced, especially in the eastern part of the proposed World Heritage area. “The IUCN mission understood that grazing intensity has fallen substantially in the last years”, the report states. Even so IUCN still accepted the Chinese authorities’ framing of the issue, stating in its report that: “Intensive grazing and human-wildlife conflict is also a current threat in part of the property, within Sanjiangyuan Nature Reserve.”

The Chinese government presents the presence of nomadic pastoralists as a ‘conflict’, reflecting a false premise that informs its policy of nomad settlement in the PRC. It is described by the CCP authorities as: “a contradiction between grass and animals”<sup>[21]</sup>, which does not accept the skillful productivity of moving herds from pasture to pasture well before grasses are grazed too heavily.

Chinese scholars have noted the importance of seeking to preserve and protect livelihoods in dryland areas such as Hoh Xil, supported by UNESCO. Acknowledging the problem of difficulties in drylands, Han Qunli argued in one paper that: “a general lack of investment in drylands are now putting extraordinary strains on the livelihoods of dryland inhabitants and the integrity of their ecosystems. Ensuring dryland inhabitants have viable livelihoods will be key to their survival.”<sup>[22]</sup>

During his visit to Qinghai, Xi Jinping reiterated the official line about removing pastoralists from the grasslands, despite the scientific consensus among rangelands experts in the PRC and internationally that the indigenous knowledge of pastoralists and herd mobility are crucial to the protection of the environment. His visit was indicative of the high priority accorded by the Party state to Tibet, which is the context for the UNESCO application.



This picture from Chinese official media portrayed Xi Jinping with villagers in Qinghai. The headline to this cartoon in the official media read ‘Walking in the rain shows concern for locals’. China Daily even published a cartoon version of Xi Jinping’s Qinghai tour.

Tibet is the source of most of Asia’s major rivers, including the Yangtze, the Mekong and the Brahmaputra, and as such is of critical importance to hundreds of millions of people in the water-dependent societies downstream. Known as the earth’s ‘Third Pole’, because it contains the biggest reserves of freshwater outside the Arctic and Antarctic, Tibet’s changing climate not only affects the monsoon in Asia, but also weather in Europe. It is little-known that Tibet is a climate change epicenter that is warming at more than double the rate of the rest of the globe; its glaciers are melting, and its permafrost disappearing.

This combination of factors means that China’s land use policies in Tibet are of global relevance. But instead of seeking to protect this fragile high-altitude ecosystem and address the significant challenges it faces, China’s policies are re-shaping the Tibetan landscape with devastating consequences.<sup>[23]</sup>

This is because Tibet’s water is vital to the future of China and its economic expansion. It is needed to address the progressive scarcity of water resources in the North and North-East of China,<sup>[24]</sup> and to ensure the productivity of the core industrial cities of Xi’an, Chongqing and Chengdu at the foot of the plateau, involving the expansion of mining the rich resources of Tibet, including lithium, uranium and gold.<sup>[25]</sup> As such, Tibet’s water is seen as a strategic asset by the CCP leadership, and so Beijing’s policies on Tibet, which are generally accepted by the IUCN mission, remain exempt from genuine debate and enquiry.

*“What these farsighted Tibetans did not expect was that, in the name of watershed management and growing more grass, many would be resettled far from home on the fringes of an industrial city, with no vocational education enabling entry into the industrial economy, no access to ancestral land, no mobility and no use for their deep understanding of how to live and thrive in a water meadow land of lakes ideal for yaks, sheep and horses, in which jeeps*

*only bog. While the displaced nomads are reduced to dependence on state rations, in new concrete settlements, their lands are now solely governed by a sovereign state that has never understood or appreciated this vast landscape of frozen lakes in winter and permafrost summer melt into wetland and water meadow.”*

– Gabriel Lafitte, in his blog [www.rukor.org](http://www.rukor.org)

## Nomads in the UNESCO World Heritage area

It is difficult to ascertain exactly how many nomads have been removed, or remain, in the area nominated for World Heritage status, due to controls on information due to the priority of the Chinese Party state and inadequate statistics available. This in itself is one of the reasons that the International Campaign for Tibet is pressing for a detailed assessment of the nomination.

While the IUCN gives specific numbers of people in the area detailed below, it is also important to take into account that it is the nature of nomadic lifestyle that pastoralists range across vast distances, with no exception in Hoh Xil and its surrounding areas. The continued presence of Tibetan pastoralists has been documented in Hoh Xil in recent years, with nomads from the Tibet Autonomous Region moving into the Qinghai part of the area where UNESCO status is being sought. It appears that the Qinghai authorities sought to intervene to remove them both before and while the UNESCO nomination was being made, according to a source who has worked in the area.

The source, whose name is withheld due to the individual's role in the People's Republic of China, told the non-governmental organization "World Heritage Watch" that Chinese colleagues confirmed the presence of Tibetan pastoralists in Hoh Xil over the past decade, stating that Tibetan pastoralists from the Tibet Autonomous Region (TAR) had moved into the Qinghai part of Hoh Xil to herd. The Qinghai authorities then sought to influence the TAR government to bring the pastoralists back to the TAR. This further indicates that the Chinese authorities had an intention, and took action, to remove Tibetan herders from the nominated area.<sup>[26]</sup>

The state narrative of removing nomads from their pastures in Hoh Xil was emphasized more than a decade ago, setting the stage for China's UNESCO nomination. In an official report from 2005 obtained by the International Campaign for Tibet – a year after Tibetan nomads' role in protecting wildlife was highlighted in the film 'Kekexili: Mountain Patrol' – nomads were described in entirely negative terms as "encroaching" on the land, and the significance of the area as a water source to the Chinese Party state was made clear. The 2005 article also uses the term 'no man's land', the literal translation in Chinese of the term 'uninhabited area', to refer to the lack of human settlement and the official push to remove Tibetan nomads.<sup>[27]</sup>

The article, published in Beijing Youth Daily, the official newspaper of the Party's youth wing, stated that the source of the River Yangtze, which rises in the area, must be protected from all 'threats' – especially nomadic Tibetans. Stressing the importance of Tibet's water to China, the report states: "The no-man's land of the Qinghai-Tibet plateau, known to Chinese and foreign scholars as 'the world's highest natural zoo', has more than 40 national grade-1 and grade-2 protected animals, including the Tibetan donkey, wild yak, snow leopards and black-necked cranes, and at present it has some of the fewest developed areas in the world. It is also an important environmental protection area and water source for our country, with numerous rivers and lakes. The Mother River of the Chinese Peoples – The Yangtze – also rises in this area."

There is further evidence for the removal of nomads after 2005 and before the World Heritage nomination was made in the Beijing Youth Daily report. This report, translated into English by ICT and included below, states that: "There were already nomads living around the 5000-m high Fenghuo Mountain pass, with more than 1000 sheep and more than 200 yaks put out to graze on the mountain slopes. At a place along the 3146 km Qinghai-Tibet highway, there were also nomads who had put out more than a thousand head of livestock."<sup>[28]</sup>

The IUCN report acknowledges that the Chinese government will "gradually impose a ban on herding" and move Tibetan nomads into working in other areas. UNESCO's expert evaluation mission expresses concern about China's approach: "Currently the nature reserves are responsible for controlling grazing activities, and the nomination notes that across the large part of the property, the management agency will "gradually impose a ban on herding among sparse residences in the resettlement area and further consider specific voluntary resettlement policies, locations, compensation mechanisms and other measures that can promote

the wellbeing of the resettlements. Herders in the buffer zone are being engaged in grassland conservation and livestock reduction policies, and local herders have been organized to participate in the conservation practices.”

The admission of concern among Tibetans about the project is particularly notable given the presence of high-level Chinese Communist Party officials who accompanied the IUCN delegation,<sup>[29]</sup> and the status accorded to the project. The Chinese authorities have promoted their nomination and likely inscription by UNESCO in state media, with an article recently drawing attention to IUCN’s approval of the nomination.<sup>[30]</sup> The technical evaluation team reported: “The evaluation mission heard concern within the local population regarding being displaced or resettled as a result of the nomination process and outcomes, and several reviewers raised the issue as of concern. IUCN considers that it is imperative that questions of rights, access and traditional use are addressed rigorously and carefully by the State Party [China], in full consultation, and the World Heritage nomination must not be used to justify any deprivation of traditional land use rights of the concerned communities.”

## The politicization of Hoh Xil in history

Historically, Hoh Xil is far from being a ‘no man’s land’. Archaeologist John V Bellezza, who has long experience in travelling in the region, has shown the evidence of human culture in Hoh Xil and the adjacent northern Changtang over thousands of years ago. His photos of Tibetan antelopes carved into rock by Tibetans thousands of years ago are included in his writings on this area of the plateau.<sup>[31]</sup>

China’s Hoh Xil World Heritage nomination, under the heading of “Human History”, supports this, stating that: “According to archaeological research, many Palaeolithic stone tools were found at the alluvial fans of the south bank of the Ulan UI Lake, which date back to approximately 20,000 years.” Unfortunately IUCN then undermines this same approach by adhering to the official line, stating that there were no residents in the area “before the pre-Kuomintang period “due to the “bitter cold”. No Tibetan pastoralists were likely consulted about this misrepresentation.



It is notable that not all international observers to the People’s Republic of China and the Tibetan plateau have accepted China’s politicized framing of the issue of nomadic settlement. On an official visit to China in 2010, the then U.N. Special Rapporteur on Food, Olivier De Schutter, aligned himself with the new consensus on the value of keeping nomadic herders on the pasturelands, stating strongly that both Tibetan and Mongolian nomads should not be compelled to settle. Linking nomad settlement to deprivation of livelihood, the U.N. Rapporteur stated: “While there is little doubt about the extent of the land degradation problem, the Special Rapporteur would note that herders should not, as a result of the measures adopted under the ‘tuimu huancao’ (‘removing animals to grow grass’) policy, be put in a situation where they have no other options than to sell their herd and resettle. [...]”<sup>[32]</sup>

## Implications of UNESCO status: shutting Tibetans out, inviting Chinese tourists in

For China, Tibet has become a mass tourism destination, with official plans stating that by the end of 2020, the number of annual visits to Tibet should reach 20 million.<sup>[33]</sup> Yet tourism remains heavily concentrated in Lhasa, with few other destinations known to the market. China’s planners have invested heavily in recent years in airports and transport hubs outside Lhasa in areas including Mt Kailash. According World Heritage status to Hoh Xil, a wild landscape between Lanzhou and Xining, on the way to Lhasa, would contribute towards plans to make the TAR a tourist circuit, attracting a heavier footfall.

The Chinese authorities have sought to ‘re-brand’ Tibet as a grid of tourist itineraries. The creation of a series of ‘tour circuits’ has been backed up by massive infrastructure investment funded by Beijing, not only the railway to Lhasa and Shigatse, but also regional airports giving tourists glimpses of Tibet’s variety of



landscapes, architecture, wildlife and heritage. What is now in place creates a circuit that enables the intensification of an industry, a capacity to deliver specific experiences, designed to appeal to defined and segmented markets.

China's 2010-2020 tourism strategy for Tibet names the two main markets as "human culture tourism" and "ecotourism", with "boutique tourist routes" and "safari tourism" for adventurous travellers seeking wild landscapes, such as Hoh Xil and its environs.

Tour packages pitched at various markets can promote Tibet as an unspoiled landscape, with stopovers in the arid herding districts of the north, the historic ruins of the depopulated far west, the slopes of Chomolangma (Mt Everest), and the forest, flowers, wild rivers and gorges to the east.

The IUCN report on the area, described as the 'property', highlights the dangers of untrammelled tourism, stating that while a "simple tourism strategy which proposes a limitation of the visitor numbers is defined in the management plan", "no specific measures are defined to achieve this." IUCN recommends that: "A more elaborated tourism strategy is clearly needed".<sup>[34]</sup>

## The UNESCO nomination for Hoh Xil and climate change

The IUCN notes that the nominated 'property' is impacted as a result of climate change, with the recorded average temperature and precipitation rising "significantly" over the past four decades.<sup>[35]</sup> The IUCN reports: "With this rapid change, glaciers, permafrost, rivers, lakes, wetlands and springs have responded accordingly, offering what is a dramatic example of terrestrial landscape change and a rare record of geomorphic processes. The primary productivity of the nominated property appears to have increased, new rivers and lakes and marshlands have emerged, offering new habitats to ungulates and water birds."<sup>[36]</sup>

Such changes – lake levels rising, rainfall increasing, the land becoming less hostile to pastoralism – are conducive to more human presence, not less. Gabriel Lafitte writes: "This is one of the few places where global climate change, at least in the short-term, has beneficial effects. Hoh Xil is rapidly recovering, after decades of rapacious mining, and antelope slaughter. There is summer grass for both wild and domestic animals, if managed skillfully by those who know the land, as Tibetans do. In the past human use and wildlife existed together, in future this could expand."

In proposing a "strengthened and coordinated programme of monitoring of the effects of climate change", IUCN notes the global significance of the Tibetan plateau in a broader discussion on global warming, stating: "Considering the large scale of the property, there is a significant opportunity to provide information about change, and lessons regarding response, that would be of international interest."

Dr Katherine Morton, who is researching climate change and transboundary water security across the Himalayan-Hindu Kush, has cautioned against blaming nomadic pastoralists for the impact of climate change. Dr Morton, who has conducted research on the impacts of climate change on the Tibetan Plateau and its implications for regional security, writes: "A major problem is that we still do not know enough about climate impacts on the grasslands. Field investigations are few and far between. What we do know is that a simple causal relationship between overgrazing and environmental degradation – a 'Tragedy of the Commons'-style scenario – is misleading, precisely because it fails to take into account climate change. Placing disproportionate blame on Tibetan pastoralists also greatly undervalues indigenous knowledge and the important role that the original custodians of the land can play in climate adaptation efforts. [...] The interdependencies between environmental degradation, human well-being and regional security can only be addressed on the basis of a cooperative and people-centred approach."<sup>[37]</sup>

In China's narrative of 'ownership' of the Tibetan plateau, it states that its policies on the environment and land use are its own 'internal affair', despite its critical importance not only to Tibetans but also to Chinese, and hundreds of millions of people in the water-dependent societies downstream.

## Dangers for wildlife from engineering corridor

The mapping of the Hoh Xil bid excludes a multi-modal transit corridor connecting inland China with the TAR, known as the Qinghai Tibet Engineering Corridor (QTEC), bisecting these contiguous nature reserves, with 250 km running through Hoh Xil. This carries the only railway to central Tibet, a major highway, an oil and petroleum pipeline, fibre-optic cabling, and an ultra-high voltage power line bringing electricity from Qinghai

to Lhasa. The mapping of the area also excludes a large cobalt mine.<sup>[38]</sup>

According to the UNESCO nomination, QTEC is not technically part of the proposed World Heritage area, except as vaguely designated “buffer zone.” The nomination before UNESCO, presented in May 2017, states: “A notable challenge in the protection of the property is the highway and a railway that connect Qinghai and Tibet, and which pass through the eastern section of the property from the north to the south. Animal migration in this area is facilitated via the construction of corridors and active management of the transport corridor during the migration season.”<sup>[39]</sup>

This means that the entire QTEC as it slices across Hoh Xil is now defined as being four kilometres wide, excluding UNESCO from any power to limit human use. The migrating female antelopes will have to navigate across QTEC without protection.



The 1142 km section of the railroad from Golmud to Lhasa traverses the vast high altitude plains once mostly inhabited only by wild animals such as the Tibetan antelope, or chiru. The chiru is increasingly endangered as these areas, protected in the past by their remoteness, have become increasingly accessible as a result of road and rail construction, and the greater availability of suitable vehicles. (Image: ICT)

UNESCO’s mission to the area goes further, stating that it considers this transportation corridor to be “the most obvious of the threats” to the integrity of China’s nomination. IUCN concludes that: “The Qinghai-Tibet Highway is a long-standing presence that is heavily used, and severely affects the migration route of the Tibetan antelope from the Sanjaiguyan Nature Reserve to their calving grounds and back, as well as the movement of wildlife in general and the ecological functioning of the plateau.” In a critical assessment, IUCN notes: “No monitoring of the animal mortality due to the highway (and other corridor infrastructure) is in place to assess this impact, and no management response is currently being undertaken for other species.”

The Chinese state party has effectively imposed a political boundary in its mapping of the World Heritage area which does not accord with scientific and objective assessments on the range of the antelopes – who need a much bigger area, especially to give birth and tend their young while they are vulnerable.

*Chinese author Liu Jianqiang writes about the deep Tibetan affinity with the Tibetan landscape and its wildlife in his book, ‘Tibetan Environmentalists in China: The King of Dzi’.<sup>[40]</sup> One chapter focuses on the lives of Tibetans in Hoh Xil, and the work of the ‘Wild Yak Patrol’ led by Sonam Dargye, who was murdered by Tibetan antelope poachers. Liu Jianqiang tells this story of a debate among the local pastoralists at the time when nature reserves were beginning to be created on the Tibetan plateau: “There was no medical service, no highways nor electricity. Suojia was caught in the middle of a net formed by the four big rivers of Mochu, Yamchu, Damchu and Jichu. Half the year, water isolated it from the outside world. ‘Wild ass and marmot are our specialities,’ Tador [the first son of Sokya to get a university education] replied. ‘We’ve got no minerals and no caterpillar fungus [for income]. Our cattle can’t be shipped out. Therefore in Suojia – including Hoh Xil – our only specialty is wild animals.’ Wild and rare animals are abundant in Suojia: Tibetan antelopes, snow leopards, Tibetan wild ass, black-necked cranes. Tador said, ‘We can establish wild animal zoos here just like in Africa. Our country may not care for us, but may care for the animals. When it’s time to care for the animals, they will have to care for us. If we successfully protect Suojia, they will invest to solve our livelihood issues when the government establishes nature reserves. Party Secretary Sonam [Dargye] was sacrificed for the protection of Tibetan antelopes. We’ll continue his work.’<sup>[41]</sup>*

## Hoh Xil’s importance as sacred and cultural site

Hoh Xil, like Jiuzhaigou and Three Parallel Rivers, has been defined by the Chinese authorities as a purely natural landscape in the UNESCO nomination, completely omitting the human beings who have in all three areas protected the landscape and animals, wildlife and domestic herds, sustainably for thousands of years.

But the concept of heritage embraces both nature and culture, which is written into the 1972 global treaty underpinning the UNESCO World Heritage process.<sup>[42]</sup> In 2016, Dr Mechtild Rössler, Director of the Division for Heritage and the UNESCO World Heritage Center, pointed out that in order to qualify as cultural heritage,

monumental buildings are not necessary: “It is justifiable by virtue of the powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence.”<sup>[43]</sup> Dr Rössler cited such examples of indigenous stewardship as Uluru Kata Tjuta in Australia and Tongariro National Park in New Zealand.

The role of IUCN in urging the inscription of World Heritage to Hoh Xil also appears to be inconsistent with the resolutions of the IUCN World Conservation Congress, which at its 4th Session in 2008 resolved “to apply the requirements of the United Nations Declaration on the Rights of Indigenous Peoples to the whole of IUCN’s Programme and operations” (Res. 4.048). In the same resolution, the WCC called on governments “to work with indigenous peoples’ organizations to... ensure that protected areas which affect or may affect indigenous peoples’ lands, territories, natural and cultural resources are not established without indigenous peoples’ free, prior and informed consent and to ensure due recognition of the rights of indigenous peoples in existing protected areas.”<sup>[44]</sup>

In its evaluation mission, IUCN acknowledges the cultural significance of the project area, stating that in addition to traditional grazing practices, there are a number of sacred sites: “Every village has its sacred places and some of them are inside the property and the buffer zone, mainly prayer sites linked to natural features like caves, hills or mountains. Other cultural values are related to the traditional husbandry methods and to the intangible values embedded in this exceptional landscape. For many in the local population, Hoh Xil represents the birthplace of ancestors, and for the Tibetan population this plain represents a legendary hunting ground.”<sup>[45]</sup>

Importantly, IUCN concludes that: “The cultural and spiritual values of the area should be recognized and included in planning management strategies for the nominated property, noting the intimate linkage they have with the nature conservation values that are the basis for the nomination.” But it does not impose any conditionality on doing so, or suggest that the scope of the nomination should be expanded in order to protect local stewardship based on Tibetan Buddhist values.

A comprehensive approach would give local Tibetan communities, both within the designated World Heritage area, and in their traditional nomadic wintering grounds to the east, ongoing roles as stakeholders. These nomads have for thousands of years taken their herds into Hoh Xil for summer pasture, co-existing with the antelopes and other wild species. The Tibetans have proven, by taking the lead in conservation in the 1990s that they are part of any long-term solution, not the problem.

Such an approach is being developed by some Tibetan environmentalists who are working on a bid to have the Hoh Xil and Sanjiangyuan area declared as a Sacred Natural Site (SNS) under Tibetan community control, in direct contrast to the nomination by China to UNESCO. This is a category that has no official status, although the IUCN concept of an ICCA, an Indigenous or Community-Conserved Area, is similar. This is linked to a more widespread promotion of ‘sacred’ landscapes as a means of conserving nature and culture.

Sacred natural sites serve as a primary conservation network for conserving nature and culture – their degradation and loss of sacred natural sites severely threatens critical biodiversity, ecosystem services, cultural resources and even ways of life. Recognizing sacred natural sites supports community autonomy, promotes effective management and gives voice, rights and action to local people.

The NGO Conservation International has now initiated a ‘Tibetan Sacred Lands’ project, identifying 2000 sites in Kardze (Chinese: Ganzi) prefecture in Sichuan and 130 million hectares within ‘Cultural Tibet’ which constitute either animistic or Tibetan Buddhist sacred lands.<sup>[46]</sup> According to academic John Studley, around 25% of the Tibetan plateau can be classified as ‘sacred landscape’.<sup>[47]</sup>

*“The Tibetan herdsmen are the real owners of the grassland; the grassland is both the home and a source of life for Tibetan herdsmen. We, Tibetan people, since ancient times, have been living on the meadows surrounded by snow-capped mountains and the blue sky. Depending mainly on animal husbandry, our people have eaten well and lived happily for generations after generations. We believe in Buddhism. We are faithfully devoted to Kunchok Sum (the Three Jewels [of Buddhism]). We have lived in harmony with nature. We have been friendly with our neighboring nations. Our forefathers were neither unable to make weapons, nor unable to make wars to expand the territory. It is not that our forefathers did not know how to bring reformation or change things or build an industrialized civilization. It is because of religious faith, a sense of compassion, love and peace, and of respect and cherishing of nature and all living beings, that our ancestors felt satisfied with basic and simple style of life. A simple and*

*peaceful life with fewer material and more inner development was the pursuit of our forefathers. It is this that makes our Tibetan culture unique and attracts attention from the world's developed countries."*

*– from an account of the everyday difficulties of Chinese policies written by a local Tibetan from Kyegudo (Chinese: Gyegu), in the vicinity of the Hoh Xil project. It was received by the International Campaign for Tibet in 2014 and translated into English as a rare account from Tibet on nomadic lives.<sup>[48]</sup>*

## World Heritage status: effective protection or endorsement of damaging policies?

The UNESCO World Heritage Committee has inscribed two previous sites nominated by China on the Tibetan plateau, which have resulted in further damage to the fragile environment and an intensification of tourism, which the Committee has been unable to prevent.

Gabriel Lafitte, who presented a report at the UNESCO World Heritage Committee meeting last year (2016) in Istanbul, writes: "Previous UNESCO inscriptions have demonstrated that the Chinese government uses World Heritage listing as 'branding' to boost and promote mass tourism, while at the same time allowing no meaningful input into the construction in World Heritage landscapes of dams, grids and resorts. World Heritage status transforms areas inscribed, not always for the better. In 1992 the spectacularly beautiful Jiuzhaigou valley, in Sichuan, directly north of Chengdu, became World Heritage, its inscription partly as panda conservation habitat. No panda has been seen there for 20 years. This valley, named for its nine Tibetan fenced villages, has been surrounded by luxury resorts, millionaire villas, conference centres and a high-speed railway is under construction. The resort operators on their website proudly proclaim it the eastern Davos. Meanwhile, under a deluge of tens of millions of domestic Chinese tourists, UNESCO has increasingly worried that the values for which it was accepted are seriously threatened. But the response has been to make the Tibetan villagers, who cared for this land for millennia, to limit their land use, by forbidding farming, then forbidding them to earn a little by offering homestays to a few of the tourists. Both of these restrictions were proposed by IUCN missions sent by UNESCO to find solutions to the extreme over-use of the Jiuzhaigou valley by China's tourism accommodation industry."<sup>[49]</sup>



The site of the settlement in Golmud, Qinghai before its construction. (Image: ICT)

Scholarly papers by Chinese academics have reflected these concerns. In one paper, several Chinese scholars conclude that there had been "extreme economic and environmental impacts" in Jiuzhaigou in recent years, with the fast increasing tourist numbers causing "many changes in the local environment, including: increasing algae in water, increasing nutrients in water, increasing sediment in lakes, degrading travertine, and increasing threat on biodiversity." The paper, published in 2013, concludes that: "Environmental degradation continues to develop as the number of tourists is not controlled. The sustainability issue in Jiuzhaigou is mired in the conflict between the conservation of the natural beauty and local economic development. To promote sustainable tourism, the number of tourists must be controlled."<sup>[50]</sup>

Other analysts have pointed out the further difficulties this presents to local Tibetan people, in terms of affirming China's narrative of the commodification of Tibet, and exacerbating divisions. Brianna Botchwey, a fellow at the Institute of Asian Research, University of British Columbia, highlighted the situation of Tibetans in Jiuzhaigou as symptomatic of the problems created by ethnic tourism: "[...] In the Jiuzhaigou Valley, while there is the option to stay with Tibetan families, it is large hotels such as the InterContinental Resort that dominate valley accommodation. Further, instead of having meaningful interactions with minorities, tourists more often just watch them perform, snap their pictures and buy their 'ethnic' goods. As such, ethnic tourism can actually negatively enforce stereotypes of China's minorities as 'simple-minded' and 'exotic.' [...] If relations between the Han majority and ethnic minorities are to improve, these stereotypes must be dismantled and genuine cultural, not commercial, understanding and respect must take its place."<sup>[51]</sup>

It is instructive that the UNESCO proposal for consideration in Krakow is submitted by the Beijing-based

Ministry of Housing and Urban-Rural Development (MHURD). As noted by Gabriel Lafitte, in remote areas this Ministry is often involved in running scenic spots suitable for development as tourism destinations.

In another important area inscribed by World Heritage in 2003, China defined the boundaries of the “Three Parallel Rivers” site in Yunnan province to exclude the actual rivers, resulting in a configuration that allowed China to go ahead with massive damming projects.

Three of the world’s great rivers, the Yangtze, Mekong and Salween, incise this plateau landscape, separated by high ridges with rich grasslands in-between. After achieving World Heritage status, China went ahead with massive damming projects and the construction of power pylons and ultra high voltage cables sending hydro-electricity from Yunnan to Guangzhou on China’s east coast.<sup>[52]</sup> The World Heritage area covers 900,000 hectares, broken into 15 separate parcels of land, with the actual rivers that give the whole property its name entirely excluded. The aim of achieving the UNESCO brand status was to increase tourism to the area and ensure China could continue its infrastructure and development plans unimpeded.

The UNESCO World Heritage Committee will discuss the decline in wildlife, increase in infrastructure building and inadequate planning at its Krakow meeting in July 2017, but are left with no leverage in which to enforce any changes.<sup>[53]</sup> Christine Tam, Director of Conservation Area Planning for the Nature Conservancy’s China Programme, which helped prepare the nomination of the Three Parallel Rivers in Yunnan Province in 2003, commented that World Heritage: “feels like a tourism designation, not a designation to protect resources”<sup>[54]</sup>

Gabriel Lafitte points out that the Hoh Xil nomination risks being gravely compromised by China’s plans to divert water, on a massive scale, from upper tributaries of the Yangtze via tunnels through the mountains to the headwaters of the Yellow River. To move the water through the drainage divide between these rivers, huge dams and long tunnels are needed to cross the Qinghai-Tibet plateau in what is known as the Western route of the massive south to north water diversion projects, for water to be channelled to parched northern China. China’s plans for this massive water diversion indicate locations for dams and tunnels very close to the proposed World Heritage property, or perhaps within it.

## Context: China announces new plans to re-shape Tibet as nature reserves

In a new development, it was announced in the state media last month that the Chinese government is considering turning vast areas of the Tibetan plateau into national parks. According to a report in China Daily on May 11, the Tibet Autonomous Region plans to upgrade the natural reserve around the region’s largest lake of Siling in Nagchu (Chinese: Nagqu or Naqu) and expand it to surrounding areas to establish the World’s Third Pole National Park on the Qinghai-Tibet Plateau. The World’s Third Pole National Park would be established within Pelgon (Chinese: Baingoin), Shentsa (Chinese: Xainza), Nyima (Chinese: Nima) and Tsonyi (Chinese: Shuanghu district) counties in northern Nagchu, covering an area of 281,150 square kilometres. China Daily confirmed the aim to displace people in the area when it stated that the park would be established “in the future after human interference is eliminated and the wild animal population increases.”



The Chinese state media posted photographs online showing the emptiness of some of the high altitude dry landscape of Hoh Xil.

This follows an article in the South China Morning Post in late April that a planned national park would cover more than 2.5 million km<sup>2</sup>, including the entire Qinghai-Tibet Plateau, making it the biggest national park in the world. The China Daily report appeared to indicate that these plans “differed in scope” from the draft plans being discussed by Chinese officials, which “are in the early stages” and not yet decided.<sup>[55]</sup>

The news followed the announcement of a major scientific survey of the Tibetan plateau, using drones and satellites to investigate the ecology of the entire area.<sup>[56]</sup>

Chinese scientists informed of the plan immediately raised concerns about its implications, with one Chinese professor cited by the South China Morning Post as saying that: “To establish the park or not may go beyond science. It is also a political issue.”<sup>[57]</sup>

Another scientist at the same institute, which is part of the Chinese Academy of Sciences, Professor Liu Jingshi, said that the Third Pole National Park would be difficult to manage due to its size, saying: “It is too big for a park”. He pointed out that it took the United States government decades to figure out how to manage Yellowstone, the world’s first national park, which was established in 1872.<sup>[58]</sup>

While the proposed Third Pole national park would admit tourists, like the nomination before UNESCO it would likely necessitate the removal and relocation of Tibetan nomads, given the grazing restrictions in areas accorded national park status.

The UNESCO nomination by the Chinese leadership highlights the smokescreen of opaque language used to convey the impression that the creation of national parks in Tibet have the aim of conservation, and climate change adaptation and mitigation. In this context, the displacement of nomads from their ancestral lands is framed in terms of environmental protection, although the opposite is the case.

## Recommendations by the International Campaign for Tibet

While the International Campaign for Tibet fully supports the aim of protecting biodiversity in the UNESCO application, there is no justification for removing nomads or seeking to block passage of herders through the area, or for using the UNESCO brand to boost tourism and infrastructure while doing so. The involvement of Tibetans – and nomads in particular – as stewards is essential to sustaining the wildlife, the long-term health of the ecosystems, and the water resources that China and Asia depend upon. China’s UNESCO proposal for Hoh Xil denies the Tibetan human presence in Hoh Xil, and the long history of Tibetans sustainably curating the land.

- For the reasons outlined we recommend that the World Heritage Committee should not inscribe Hoh Xil at this time but defer the nomination for “more in-depth assessment or study, or a substantial revision by the State Party”, according to Article 160 of the Operational Guidelines. This should take into account the implications of concerns raised by UNESCO’s World Heritage Committee mission to the Tibetan plateau in 2016.
- Consistent with this guideline, an “in-depth assessment or study” should be made about the presence of Tibetan pastoralists in the core zone of the nominated area, involving a representative number of the affected Tibetan herders and international experts. The rights of Tibetan nomads to use the area for traditional grazing and to co-manage the area must be fully guaranteed before the process of inscribing the Qinghai Hoh Xil nomination is taken forward. This is consistent with the stipulations in the World Heritage Center’s manual on the involvement of local people and stakeholders (2.3).
- Any management plan for a World Heritage Hoh Xil property must include participatory co-management; with local pastoralist communities empowered to jointly make decisions, together with the state party. UNESCO faces a real choice between a proven record of local Tibetan communities successfully protecting endangered wildlife by putting their lives on the line; and state-sponsored official conservation amid a tourism surge.
- IUCN details a number of sacred and cultural sites in the area. This acknowledgement raises the question of recognizing Hoh Xil for its cultural as well as natural significance, which would be inconsistent with removing Tibetans from the land and excluding them from the decision-making process.

- A mapping and description of such sites should also be undertaken and included in the nomination document. Protection of these sites must be guaranteed by law and upheld in practice, and free access to the sites as well as the freedom to practice their religion must be granted to the Tibetans at these sites. On the basis of their description, the International Council on Monuments and Sites, ICOMOS, should submit to the World Heritage Committee an assessment and recommendation whether they merit an inscription of Hoh Xil also under cultural criteria.
- Any mission on behalf of UNESCO should be given time and access to the project area to ensure there is no mining or resource extraction anywhere within the proposed World Heritage site. Mindful of UNESCO's recent and repeated experiences of mining in the Three Parallel Rivers of Yunnan, any repeat failure to impose UNESCO standards is unacceptable.
- UNESCO should obtain assurances that any plans to divert waters of upper Yangtze tributaries to the upper Yellow River do not in any way impinge on the proposed Hoh Xil World Heritage property.
- UNESCO should prioritise meeting with civil society in Hoh Xil, notably with Tibetan individuals and groups working towards the inscription of Sacred Natural Sites (SNS). SNS is a concept more closely aligned with traditional Tibetan drivers of effective stewardship and active protection of wildlife from poachers, respecting community control without encouraging mass tourism.

## Appendix: ICT translation of official news article on Hoh Xil

[http://news.xinhuanet.com/st/2005-09/06/content\\_3448651.htm](http://news.xinhuanet.com/st/2005-09/06/content_3448651.htm)

可可西里保护区被大量侵占 青藏高原无人区锐减

Kekexili protection area encroached by large numbers, uninhabited area of the Qinghai-Tibet plateau falling

2005年09月06日 08:21:00 来源：北京青年报

September 6, 2005. Source: Beijing Youth Daily

青藏高原无人区因人为原因锐减20多万平方公里

Uninhabited area of the Qinghai-Tibet plateau falls by more than 200,000 km<sup>2</sup> due to humans

记者近日在青藏高原采访时了解到，由于人口增多和放牧范围的扩大，原有50万平方公里的青藏高原无人区锐减了20多万平方公里。西藏自治区林业勘查研究院院长、野生动物专家刘务林说，除羌塘和可可西里两个自然保护区被大量侵占以外，两个保护区以外的10多万平方公里的“无人区”，也有牧民居住或人类活动。

It was learned during a visit in recent days to the Qinghai-Tibet plateau that due to increasing numbers of people and the expansion of pastureland, the uninhabited area of the Qinghai-Tibet plateau has fallen from 500,000 km<sup>2</sup> by more than 200,000 km<sup>2</sup>. Liu Wulin, Principal of the TAR Forestry Research Institute and an expert in wildlife, said that aside from the large numbers encroaching on the two nature preservation areas of the Qiangtang and Kekexili, another 100,000 km<sup>2</sup> of “uninhabited areas” outside of the two protection areas also has nomads in residence or human activity.

■最新调查显示：392人、7200多头牛、4万多只羊迁入保护区

The latest survey shows: 392 people, 7200 head of cattle and more than 40,000 sheep have moved into the protection area.

被中外学者称为“世界上最高的天然动物园”的青藏高原无人区，平均海拔在4600米以上，生长着藏羚羊、野牦牛、雪豹、黑颈鹤等40多种国家一、二级保护动物，是迄今为止世界上少有的几块未开发区域之一。这里也是我国重要的生态保护区和水源涵养地，域内河流、湖泊众多，中华民族的母亲河长江就发源于这一地区。

The uninhabited area of the Qinghai-Tibet plateau, known to Chinese and foreign scholars as “the world’s highest natural zoo”, has an average elevation of more than 4600m above sea-level, with more than 40 national grade-1 and grade-2 protected animals, including the Tibetan donkey, wild yak, snow leopards and black-necked cranes, and at present it has some of the fewest developed areas in the world. It is also an important environmental protection area and water source for our country, with numerous rivers and lakes. The Mother River of the Chinese Peoples – The Yangtze – also rises in this area.

青海省西北部的可可西里无人区总面积4·5万平方公里。记者在这一地区采访时见到，海拔5000米的烽火山口已经有牧民居住，1000多只绵羊和200多头牦牛放牧在山坡上。在青藏公路3146公里处，也有牧民在放养着上千头（只）牲畜。从五道梁经烽火山至沱沱河一线，记者见到了11户牧民的帐房。

The Kekexili uninhabited area in the northwest of Qinghai Province has a total area of 45,000 km<sup>2</sup>. As was seen during a visit to this area, there are already nomads living around the 5000m-high Fenghuo Mountain pass, with more than 1000 sheep and more than 200 yaks put out to graze on the mountain slopes. At a place along the 3146 km Qinghai-Tibet Highway, there were also nomads who had put out more than a thousand head of livestock. Along the route from Wudao Bridge past Fenghuo Mountain to the Tuotuo River, 11 nomad tents were seen.

青海省可可西里国家级自然保护区管理局局长才嘎告诉记者，最新调查显示，保护区内目前已迁入了64户牧民、392人、7200多头牛、4万多只羊。

Caige, the Director of the Kekexili National-Level Natural Protection Area Management Bureau, explained the latest surveys showed that at present, 64 nomad families, 392 people, more than 7200 head of cattle and more than 40,000 sheep had moved into the protected area.

■可可西里保护区管理局局长：牧民活动范围占了保护区的25%

Director of the Kekexili Protection Area Management Bureau: the range of nomad activity occupies 25% of the protected area.

才嘎说，搬入可可西里无人区的住户既有青海本地的牧民，也有来自西藏那曲地区的牧民，这些牧户不但在无人区的实验区和缓冲区活动，在核心区的西金乌兰湖、乌兰乌拉湖、长江北源楚玛尔河上游地区也都有人在放牧。活动范围约占保护区的25%，超过了1万平方公里。

Caige said that the nomads moving into the Kekexili uninhabited area are from Qinghai itself, but there are also nomads from Naqu Prefecture in Tibet. These nomads not only carry out activities in the experimental zones and buffer zones in the uninhabited area, they also all put livestock out to pasture in such core areas as Xijin Wulan Lake, Wulan Wula Lake, and the upper reaches of the Chuma'er River which is the northern source of the Yangtze River. The range of nomad activity occupies around 25% of the protected area – in excess of 10,000 km<sup>2</sup>.

西藏自治区羌塘国家自然保护区面积29·8万平方公里，平均海拔5000米以上，是我国目前最大的陆地自然保护区，青藏高原70%的藏羚羊在此栖息。

The Qiangtang National Natural Protection Area in the TAR has an area of 298,000 km<sup>2</sup>, and with an average elevation of more than 5000m above sea-level, it is currently the largest mainland nature preservation area in our country, and habitat for 70% of the Tibetan donkeys on the Qinghai-Tibet plateau.

羌塘保护区那曲管理局局长布穷介绍，30多年前，保护区内除少数科考人员偶尔活动外无人常住，是名副其实的无人区。1976年，为解决申扎县和尼玛县的草畜矛盾，曾有100多户牧民搬入无人区，并在现在的核心保护区建立了县级机关“双湖办事处”。According to Buqiong, Director of the Qiangtan Protection Area' Naqu Management Bureau, more than 30 years ago, aside from the occasional activities of a small number of expedition personnel, no one lived permanently within the protection area, and it was known as a “no-mans land”.<sup>[59]</sup> In 1976, in order to resolve the cattle-grassland contradiction<sup>[60]</sup> in Jiaza County and Nima County, more than 100 nomad families were moved into the uninhabited area, and in what is now the core protection area, the county-level “Twin Lakes Office” agency was established.

布穷说，目前，核心保护区内已有400多户牧民，主要集中在若拉、玛依和羌马错地区，双湖办事处的人口已上万，有人类活动的无人区面积超过了10万平方公里。（殷耀 贾立君 任晓刚）

Buqiong said that at present there are already more than 400 nomad families living within the protected area, primarily concentrated around the Nuola, Mayi and Qiangma Cuo areas. The population of the Twin Lakes Office is already more than 10,000 people, and there is human activity in more than 100,000 km<sup>2</sup> of the uninhabited area.

## Footnotes:

[1] Hoh Xil or Kekexili are the Chinese transliterations from the original name of the place in Mongolian. The Tibetan rendering of the name is “Achen Gangyap”, the literal meaning of which is “Beyond the Achen Snow Mountain”. The Mongolian name is rendered as “Kokoshili”. Some local Khampas also refer to the area as “Litri Limar”. Achen Gangyap, is also a name for the Amnye Machen range, according to the “Large Tibetan-Chinese Dictionary” published in Beijing. ([http://dictionary.thlib.org/internal\\_definitions/public\\_term/133348](http://dictionary.thlib.org/internal_definitions/public_term/133348)) The Chinese media refer to this as the Tibetan name for the area, as it appears to be the name for a group of peaks in the Kunlun range roughly northwest of Tuotuo He;

[2] 3,735,632 hectares. The total area is just over 60,000 square kilometres;

[3] 2,290,904 hectares;



[4] A state media report in Chinese gave details of the project area on February 18, 2016: <http://www.qhnews.com/newscenter/system/2016/02/18/011935189.shtml>. It states that the nomination was first delivered to UNESCO on January 30, 2016, to culminate in the final decision in Krakow in July 2017;

[5] See International Campaign for Tibet, December 8, 2015: "Blue Gold from the Highest Plateau: Tibet's water and global climate change", <https://www.savetibet.org/new-report-reveals-global-significance-of-tibet/>;

[6] Tibet specialist Gabriel Lafitte details more than 200 scientific papers published in the PRC that support this conclusion, in a report for the Tibetan Center for Human Rights and Democracy, published on May 30, 2015 entitled "Wasted Lives: A critical analysis of China's Campaign to End Tibetan Nomadic Lifeways", <http://tchrd.org/wasted-lives-new-report-offer-fresh-insights-on-travails-of-tibetan-nomads/>. Lafitte writes in the report: "Wherever there are pastoralists, there is now a fresh understanding that, far from being to blame for desertification, there are skillful stewards of drylands whose willingness to maintain mobility enables them to live productively and in environmentally sustainable ways from uncertain, unpredictable climates. In China, the biggest grassland country in the world, there are now Chinese scientists speaking up at every opportunity for the new paradigm, explaining how the old paradigm, of sedentarising nomads, has caused only perverse, unintended outcomes, chiefly the land degradation that is blamed on ignorant, uncaring, selfish nomads." In a New York Times article by Andrew Jacobs documenting these policies, Nicholas Bequelin, the director of the East Asia division of Amnesty International, said the struggle between farmers and pastoralists is not new, but that the Chinese government had taken it to a new level. "These relocation campaigns are almost Stalinist in their range and ambition, without any regard for what the people in these communities want," he said. "In a matter of years, the government is wiping out entire indigenous cultures." In: New York Times, July 11, 2015: "China Fences In Its Nomads, and an Ancient Life Withers", [https://www.nytimes.com/2015/07/12/world/asia/china-fences-in-its-nomads-and-an-ancient-life-withers.html?\\_r=0](https://www.nytimes.com/2015/07/12/world/asia/china-fences-in-its-nomads-and-an-ancient-life-withers.html?_r=0);

[7] According to IUCN, "The population underwent a severe decline in the 1980s and early 1990s as a result of commercial poaching for the valuable underfur, leading to an estimated 65,000-72,500 by the mid-1990s (George B Schaller, 'Wildlife of the Tibetan Steppe', July 1998, University of Chicago Press)." IUCN further noted that rigorous protection has been enforced since then, with George B Schaller later suggesting there may be 100,000 in 2008. See: IUCN Red List for threatened species at <http://www.iucnredlist.org/details/15967/0>. IUCN states: "The species was recently assessed as Near Threatened on the Chinese National Red List of Vertebrates. It is also assessed as Near Threatened here, because the current status can only be maintained with continued high levels of protection in its natural range and strict controls on trade and manufacture of the shawls made from its underfur: any relaxation in the protection regime are predicted to result in a rapid population decline due to commercial poaching at a rate meeting the threshold for a threatened category";

[8] By Lu Chuan in 2004, "Kekexili: Mountain Patrol" (Columbia Pictures/Warner);

[9] This is documented by numerous sources, including the following: Joseph L. Fox, Kelsang Dhondup and Tsechoe Dorji, "Tibetan antelope *Pantholops hodgsonii* conservation and new rangeland management policies in the western Chang Tang Nature Reserve, Tibet: is fencing creating an impasse?" In: *Oryx*, 2009, 43 (2), 183-190;

[10] China's official nomination to UNESCO, p 137 of hard copy document seen by Gabriel Lafitte, and cited in his blog posted on October 18, 2016, <http://rukor.org/in-the-no-mans-land-of-tibet/>;

[11] China's official nomination to UNESCO, *ibid.*, p 139;

[12] China's nomination, available in recent UNESCO documents, states: "According to the Conservation Regulation of the Hoh Xil Natural Heritage Area in Qinghai Province, adopted by the Standing Committee of Qinghai Provincial People's Congress, valid from October 2016, an administrative authority for the nominated property will be set up under the Department of Housing and Urban-Rural Development of Qinghai Province to assume protection and management responsibility for the property." UNESCO document WHC/17/41.COM/8B at <http://whc.unesco.org/archive/2017/whc17-41com-8B-en.pdf>;

[13] Regulations of the People's Republic of China on Nature Reserves 中华人民共和国自然保护区条例 [已被修订CLI.2.10458(EN), Decree No. 167 of the State Council, 10-09-1994 includes the following: "Article 27. Nobody may be allowed to enter the core zone of nature reserves. If it is necessary for the residents living in the core zone of a nature reserve to move out, the local people's government shall make proper arrangement to have them settled down elsewhere. Article 24. The public security organ of the region where the nature reserves are located may set up its dispatched agency within the nature reserves to maintain public security if necessary. Article 25. The units, residents in the nature reserves and the personnel allowed to enter into the nature reserves shall comply with various regulations of administration, and subject themselves to the management institutions of the nature reserves."

[14] Article 26 of a set of official regulations promulgated in 1994 governing the creation and administration of nature reserves states: "In nature reserves, such activities as felling, grazing hunting, fishing, gathering medicinal herbs, reclaiming, burning, mining, stone quarrying and sand dredging, shall be prohibited unless otherwise stipulated by relevant laws and regulations." Regulations of the People's Republic of China on Nature Reserves 中华人民共和国自然保护区条例 [已被修订CLI.2.10458(EN), Decree No. 167 of the State Council, 10-09-1994

[15] Blog by Gabriel Lafitte, <http://rukor.org/in-the-no-mans-land-of-tibet/>, posted on October 18, 2016;

[16] Details of self-immolations at International Campaign for Tibet, "Self-immolation fact-sheet", <https://www.savetibet.org/resources/fact-sheets/self-immolations-by-tibetans/>;

[17] Account received by the International Campaign for Tibet in 2014 and translated into English as a rare account from Tibet on nomadic lives;

[18] IUCN Evaluation Report, May 2017, following a field visit by Chimed-Ochir Bazarsad and Carlo Ossola, 27 October-6 November 2016, <http://whc.unesco.org/archive/2017/whc17-41com-inf8B2-en.pdf>;

[19] Articles 41 and 111 of China's Constitution guarantee the right to consultation, as does the 1989 Administrative Procedure Law (see Articles 2 and 9 of the 1989 Administration Procedure Law). This law and the 1986 General Principles of the Civil Law of the PRC also stipulate compensation for property seized illegally. The 1998/1999 Land Administration Law spells out the process by which property can be requisitioned, processes by which compensation should be paid, and amounts. According to Human Rights Watch, "Indications are that [these] are rarely followed". "No one has the liberty to refuse: Tibetan herders forcibly relocated in Gansu, Qinghai, Sichuan and the Tibet Autonomous Region", report by Human Rights Watch, June 2007, <https://www.hrw.org/report/2007/06/10/no-one-has-liberty-refuse/tibetan-herders-forcibly-relocated-gansu-qinghai-sichuan>;

[20] The official media reported: "In Changjiangyuan Village, Xi was warmly welcomed by Tibetan villagers who moved there in 2004, away from the sources of the Yangtze, Yellow and Lancang rivers. Protection of the sources of the three rivers involve the relocation of people formerly residing in those places." Xinhua in English, August 24 (2016), [http://news.xinhuanet.com/english/2016-08/24/c\\_135630286.htm](http://news.xinhuanet.com/english/2016-08/24/c_135630286.htm) Also see International Campaign for Tibet report, 'Xi Jinping visit to Qinghai reveals strategic importance of Tibet's water, minerals; highlights CCP's advanced plans', September 6, 2016, at: <https://www.savetibet.org/xi-jinping-visit-to-qinghai-reveals-strategic-importance-of-tibets-water-minerals-highlights-ccps-advanced-plans/>

[21] See BAO Fenglan: "A Study Of The Countermeasures Of Optimizing Animal Husbandry Structure Of Inner Mongolia", Journal of Inner Mongolia Normal University (Philosophy & Social Science) 2005-06; Du Xiaojuan ; Cheng Ji-min; "Analysis of Formation Causes of Grassland Degradation in Damxung County of Tibet and Its Exploitation and Utilization; Journal of Anhui Agricultural Sciences , 2007", as cited by Gabriel Lafitte, November 11, 2014: "Protection or Destitution?" at <http://rukor.org/protection-or-destitution>;

[22] Foreword by Han Qunli in: Richard Thomas et al., Drylands: Sustaining Livelihoods and Conserving Ecosystem Services: A policy brief based on the Sustainable Management of Marginal Drylands (SUMAMAD) project, UNESCO/UN University 2014;

[23] See International Campaign for Tibet, "Blue Gold: Tibet's water and global climate change", op. cit.;

[24] See for instance the report by China Water Risk, March 2010: "China's Water Crisis", at <http://chinawaterrisk.org/wp-content/uploads/2011/06/Chinas-Water-Crisis-Part-1.pdf>;

[25] See Gabriel Lafitte's book "Spoiling Tibet: China and Resource Nationalism on the Roof of the World", 2013, Zed Books;

[26] The source passed on the information to the organisation "World Heritage Watch", in an email, and the International Campaign for Tibet is aware of the name and details

[27] The term 'no man's land' as a description of this particular area is used frequently in state media reports and official websites over the past few years;

[28] Giving a historical perspective, Gabriel Lafitte cites a Canadian missionary called Susie C. Rijnhart who travelled to the area in the 1890s, where she found Tibetan nomads, with their yak herds, living in Hoh Xil, as in all other areas of Tibet, pasturing their animals: "Suddenly we saw some white tents, and on nearer approach discovered there were fourteen of them, having about 1500 yak and many horses. We were received in a very friendly manner by the travelers, most of them knowing us. Though they wanted us to camp beside them, we went on to ford the waters. The sensation of camping across the river from friends was peculiar. The tents on the opposite bank looked like a town, but in the morning every vestige of the recent inhabitants with dwellings was gone, and we were again alone." ("With the Tibetans in tent and temple", 1904, 241 online via: <https://archive.org/details/withtibetansinte00rijn>). Cited in Gabriel Lafitte's blog posted on May 4, 2017, at: <http://rukor.org/kokoshilihoh-xil/>

[29] IUCN states that they met the main authorities responsible for the property at local level were met, including the Qinghai World Heritage Management Office, Secretary-General of The Party Committee of Yushu Tibetan Autonomous Prefecture, Governor of Yushu Tibetan Autonomous Prefecture, and local mayors and community leaders

[30] Chinese state media in Chinese on June 12, 2017: [http://epaper.tibet3.com/qhrb/html/2017-06/12/content\\_415706.htm](http://epaper.tibet3.com/qhrb/html/2017-06/12/content_415706.htm);

[31] John Vincent Bellezza, "The Dawn of Tibet: The ancient civilisation on the roof of the world", Rowman & Littlefield, 2014;

[32] The Special Rapporteur further concluded that he "encourages the Chinese authorities to engage in meaningful consultations with herding communities, including in order to assess the results of past and current policies, and examine all available options, including recent strategies of sustainable management of marginal pastures such as the New Rangeland Management (NRM) in order to combine the knowledge of the nomadic herders of their territories with the information that can be drawn from modern science." Press release by the Special Rapporteur on the Right to Food: [http://www.srfood.org/images/stories/pdf/press\\_releases/20101223\\_china-mission-press-release\\_en.pdf](http://www.srfood.org/images/stories/pdf/press_releases/20101223_china-mission-press-release_en.pdf). The relevant section from the Special Rapporteur's report on nomadic herders is enclosed as follows: "Threats to nomadic herders: Nomadic herders in Western Provinces and Autonomous Regions, especially in the Tibet (Xizang) and Inner Mongolian Autonomous Regions, are another vulnerable group. The Grassland Law adopted in 1985 both in order to protect grassland and in order to modernize the animal husbandry industry towards commodification has now been complemented by a range of policies and programs, including tuimu huancao ("removing animals to grow grass") and tuigeng huanlin ("Returning Farmland to Forest"). These programs, part of the 1999 Western Development Strategy (xibu da kaifa), seek to address the degradation of pasturelands and control disasters in the low lands of China. They include measures such as grazing bans, grazing land non-use periods, rotational grazing and accommodation of carrying capacity, limitations on pastures distribution, compulsory fencing, slaughter of animal livestock, and the planting of eucalyptus trees on marginal farmland to reduce the threat of soil erosion. While there is little doubt about the extent of the land degradation problem, the Special Rapporteur would note that herders should not, as a result of the measures adopted under the tuimu huancao policy, be put in a situation where they have no other options than to sell their herd and resettle. The International Covenant on Economic, Social and Cultural Rights prohibits depriving any people from its means of subsistence, and the 1992 Convention on Biodiversity acknowledges the importance of indigenous communities as guarantors and protectors of biodiversity (Art. 8 j). China has ratified both of these instruments. [...] The Special Rapporteur also encourages the Chinese authorities to invest in rehabilitating pasture, and to support remaining nomads with rural extension. The potential of livestock insurance programs should also be explored, as tested successfully in Mongolia. Such programs, which pay nomads to restock and recover after a major disaster, encourage nomads to keep herds at much smaller scale as they would not fear losing their herding activity after such disasters if covered by such insurances."

[33] The 'Ten-Year Master Plan' for the future of tourism in the Tibet Autonomous Region (2010-2020) defines the new 'zones', with Lhasa as the hub, as follows: "Tibet's tourism layout will include: the human culture tourism centre Lhasa and the ecotourism centre Nyingchi (Kongpo, Chinese: Linzhi, Tibet Autonomous Region); east-west tourism development axis and south-north tourism development axis that can connect Tibet with the outside; four boutique tourist routes in east, west, south, and north; seven scenic areas." The report also states that "tourist development axes will spread north, south, east and west from Lhasa" enabling fulfilment of the targets;

[34] IUCN technical evaluation, op. cit.;

[35] A team from China's leading cold regions research institute, the "Academy of Sciences Cold and Arid Regions Environmental and Engineering Research Institute", recently measured the size of all 83 of the Hoh Xil's largest lakes, and found that: "From the 1970s to 2011, the lakes in the Hoh Xil region firstly shrank and then expanded. In particular, the area of lakes generally decreased during the 1970s–1990s. Then the lakes expanded from the 1990s to 2000 and the area was slightly higher than that in the 1970s. The area of lakes dramatically increased after 2000. From 2000 to 2011, the lakes with different area ranks in the Hoh Xil region showed an overall expansion trend. Some lakes were merged together or overflowed due to their rapid expansion. The increase in precipitation was the dominant factor resulting in the expansion of lakes in the Hoh Xil region. The secondary factor was the increase in meltwater from glaciers and frozen soil due to climate warming." Yao Xiaojun, Liu Shiyin, Li Long, Sun Meiping, Luo Jing, "Spatial-temporal characteristics of lake area variations in Hoh Xil region from 1970 to 2011"; *Journal of Geographic Science*. 2014, 24(4): 689-702, Yao Xiaojun, Li Long, et al, "Spatial-temporal variations of lake ice phenology in the Hoh Xil region from 2000 to 2011", *J. Geogr. Sci.* 2016, 26(1): 70-82. Cited by Gabriel Lafitte in his blog posted on October 18, 2016, at: [http://rukor.org/emptying-tibetan-lands-for-safari-tourism/#\\_ftn1](http://rukor.org/emptying-tibetan-lands-for-safari-tourism/#_ftn1);

[36] More generally, there is serious concern about the impacts of climate change linked with China's land use policies across the Tibetan plateau. A combination of urbanization, intensified militarization linked to China's strategic aims, infrastructure construction and warming temperatures are creating an 'ecosystem shift' in Tibet. This involves irreversible environmental damage, including the predicted disappearance of large areas of grasslands, alpine meadows, wetlands and permafrost on the Tibetan plateau by 2050, with serious implications for environmental security in China and South Asia. See International Campaign for Tibet, "Blue Gold", op. cit.;

[37] "An uncertain future on the Plateau", by Katherine Morton, April 28, 2009, <https://www.chinadialogue.net/article/show/single/en/2961>;

[38] Chengyou Feng, Wenjun Qu, Dequan Zhang, "Re–Os dating of pyrite from the Tuolugou stratabound Co(Au) deposit, eastern Kunlun Orogenic Belt, northwestern China", *Ore Geology Reviews* 36 (2009) 213–220. Cited by Gabriel Lafitte in his blog posted on May 4, 2017, <http://rukor.org/kokoshilihoh-xil>;

[39] UNESCO nomination papers, UNESCO document WHC/17/41.COM/8B; published May 19, 2017, <http://whc.unesco.org/archive/2017/whc17-41com-8B-en.pdf>;

[40] Translated by Ian Rowen, Cyrus K. Hui & Emily Yeh, London, Lexington Books, 2015, <https://emscat.revues.org/2838>;

[41] 'Tibetan Environmentalists in China' by Liu Jianqiang, Lexington Books, 2015;

[42] UNESCO has ten criteria to enable a nomination to proceed, with the last four making no mention of the human presence in a landscape: <http://whc.unesco.org/en/criteria/>;

[43] Dr Rössler added that "This type is exemplified by Uluru Kata Tjuta in Australia, Sukur in Nigeria and Tongariro National Park in New Zealand."In: "World Heritage cultural landscapes: A UNESCO flagship programme 1992 – 2006", *Landscape Research*, 31:4, 333-353;

[44] The "Joint Statement on Continuous violations of the principle of free, prior and informed consent in the context of UNESCO's World Heritage Convention" can be found here: <http://www.international-alliance.org/Joint%20Statement%20of%20Indigenous%20organizations%20UNESCO.pdf> Also see the World Commission on Protected Areas, <https://portals.iucn.org/library/efiles/documents/PAG-004.pdf>;

[45] IUCN, *ibid.*;

[46] See 'The Sacred Natural Sites of Kham, Tibetan Autonomous Region, China', <http://sacrednaturalsites.org/items/the-sacred-natural-sites-of-kham/>;

[47] Academic paper entitled "The ritual protection of sacred natural sites on the Tibetan plateau and the optimisation of lay participation", uploaded at: [http://www.academia.edu/29509268/The\\_ritual\\_protection\\_of\\_sacred\\_natural\\_sites\\_on\\_The\\_Tibetan\\_Plateau\\_and\\_the\\_optimisation\\_of\\_lay\\_participation](http://www.academia.edu/29509268/The_ritual_protection_of_sacred_natural_sites_on_The_Tibetan_Plateau_and_the_optimisation_of_lay_participation);

[48] Full translation features in International Campaign for Tibet, "Blue Gold", op. cit.;

[49] Jiuzhaigou, a mountainous area of waterfalls, lakes and forest and an overnight trip by road from the provincial capital of Chengdu, was designated a state nature reserve by the Chinese government in 1979, but the changes to the landscape became more dramatic after it was inscribed as UNESCO World Heritage;

[50] “Challenges for sustainable tourism at the Jiuzhaigou World Natural Heritage site in western China”, *Natural Resources Forum* 37 (2013) 103–112, by Yong Gu, Jie Du, Ya Tang, Xue Qiao, Carla Bossard and Guiping Deng, [https://www.researchgate.net/profile/Xue\\_Qiao3/publication/259951126\\_Challenges\\_for\\_sustainable\\_tourism\\_at\\_the\\_Jiuzhaigou\\_World\\_Natural\\_Heritage\\_site\\_in\\_western\\_China/links/57aabfa508ae3765c3b50af6.pdf](https://www.researchgate.net/profile/Xue_Qiao3/publication/259951126_Challenges_for_sustainable_tourism_at_the_Jiuzhaigou_World_Natural_Heritage_site_in_western_China/links/57aabfa508ae3765c3b50af6.pdf). In another academic paper assessing the impacts, Wenjun Li, Xiaodong GE and Chunyan Liu from the College of Environmental Sciences, Peking University, Beijing, write: “There is no question that tourism represents one of the most environment-friendly alternatives for economic use of natural resources compared to mining, hunting and farming. However, tourism may also degrade the natural resources upon which it depends especially when management is poor. Tourism not only brings about economic increase but also adverse impacts on the ecological environment.” *Environmental Monitoring and Assessment* (2005) 108: 279–293 DOI: 10.1007/s10661-005-4327-0 c Springer 2005, available at: [https://www.researchgate.net/profile/Wenjun\\_Li/publication/7601715\\_Hiking\\_Trails\\_and\\_Tourism\\_Impact\\_Assessment\\_In\\_Protected\\_Area\\_Jiuzhaigou\\_Biosphere\\_Reserve\\_China/links/004635160fc610f899000000.pdf](https://www.researchgate.net/profile/Wenjun_Li/publication/7601715_Hiking_Trails_and_Tourism_Impact_Assessment_In_Protected_Area_Jiuzhaigou_Biosphere_Reserve_China/links/004635160fc610f899000000.pdf);

[51] “The ‘Exotic’ Minority in Western China: Why Domestic Ethnic Tourism in China May be Doing More Harm than Good,” by Brianna Botchwey, posted on October 22, 2013, in *Pacific Prospective* at <http://www.asiapacificmemo.ca/ethnic-tourism-in-china/>;

[52] See Gabriel Lafitte’s series of blogs on China’s plans for damming Tibetan rivers, including “Into the Land of the Paradoxical Parallels”, posted on May 23, 2016 at: <http://rukor.org/into-the-land-of-the-paradoxical-parallels/>;

[53] When raised at the World Heritage Committee in 2015, Committee members complained that this property of scattered jigsaw pieces: “raises questions of coherence and connectivity among and between the distinct components.” UNESCO has sent various monitoring missions to the Three Parallel Rivers since its inscription as World Heritage, which report: “Apparent decline in wildlife populations; Dams and related infrastructure; Lack of clarity of property boundaries; Mining; Inadequate management planning, including tourism planning.” Item 7B of the Provisional Agenda: State of conservation of properties inscribed on the World Heritage List, World Heritage 39 COM, WHC-15/39.COM/7B, Bonn, Germany 28 June – 8 July 2015, cited by Gabriel Lafitte in his blog posted on May 4, 2017, <http://rukor.org/kokoshilihoh-xil/>;

[54] Joana Breidenbach and Pa’l Nyi’ri, “Our Common Heritage”, in: “New Tourist Nations, Post-‘Socialist’ Pedagogy, and the Globalization of Nature”, *Current Anthropology*, Vol. 48, No. 2 (April 2007), pp. 322-330;

[55] In a report in English, *China Daily* stated that: “It could be some time before a new national park opens. For now, plans are being developed and the park’s exact area has not yet been decided.” *China Daily*, May 11, 2017: “National park proposed near lake reserve in Tibetan mountains”, <http://eng.tibet.cn/travel/news/1494467090262.shtml>;

[56] *Xinhua*, March 26, 2017: “China to conduct 2nd scientific survey on Qinghai-Tibet Plateau”, published in *Global Times in English* at <http://www.globaltimes.cn/content/1039661.shtml>;

[57] Professor Yi Chaolu, a researcher with the Institute of Tibetan Plateau Research, quoted in the *South China Morning Post*. *South China Morning Post*, April 22, 2017: “China plans world’s biggest national park on Tibetan plateau”, at <http://www.scmp.com/news/china/policies-politics/article/2088442/china-plans-worlds-biggest-national-park-tibetan>;

[58] *South China Morning Post*, *ibid*;

[59] The term “uninhabited area” in the attached is the rendition of a Chinese term which translates literally as “no man’s land”, which in English refers to the killing fields between opposing trenches in Belgium during World War One;

[60] The use of the term “a contradiction between grass and animals” epitomized the hostility of the official Chinese approach to nomadic herding, setting up an entirely false concept in order to justify the Party line.