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## **Hoh Xil nature reserve in need of a rigorous review after its controversial inscription in 2017**

**International Campaign for Tibet | 31 March, 2022**

The Hoh Xil (Tibetan: Achen Gangyap) nature reserve has not been reviewed since its controversial UNESCO inscription as a natural world heritage site in 2017, when China incorrectly claimed the area to be ‘no-man’s land’, despite being used by Tibetan nomads.

After five years of silence, there remain serious concerns related to the relocation of local residents and the management of infrastructure projects, tourism and climate change. A rigorous review of the management of the site is needed, as intensified surveillance and censorship of even environmental information from Tibet has made it increasingly difficult to monitor the situation on the ground.

Under the new dates set for the Third Cycle of Periodic Reporting, China is not due to submit a periodic review of Hoh Xil (and other heritage sites in China) until 2024.<sup>1</sup> Without new and pressing information to warrant a reactive monitoring mission and a detailed state of conservation report, we urge UNESCO officers and IUCN advisers to consider in its periodic review of the site: 1) the important role Hoh Xil plays as a model project in China’s broader national park and Tibet policy, 2) IUCN’s 2020 Conservation Outlook Assessment, and 3) specific recommendations to include the cultural and spiritual values of the Tibetan people in the management of the area.

Hoh Xil is representative of a network of new nature reserves and national parks across China, which form a critical part of China’s “eco-civilization project”. Given the significance of this nature reserve as a model for environmental conservation, it is important that the UNESCO heritage status is not used to legitimate environmental policies that expropriate land from local communities, intensify population control and surveillance measures, and eradicate local cultures for political and economic ends.

China has already used UNESCO’s heritage status to promote its model of environmental authoritarianism. Following Hoh Xil’s 2017 inscription in the world heritage list, the Chinese Foreign Ministry announced that the new heritage status represented the international community’s “full approval” of the government’s success at protecting Hoh Xil’s environment.<sup>2</sup> This is dangerous, as China’s model of environmental authoritarianism lacks participatory governance. It imposes uniformity over diversity and entraps individuals into accepting decisions made by others, with little space for participation in policy-making.<sup>3</sup> This authoritarian approach to governance, which is being employed in environmental and conservation management should not be normalized by UNESCO.

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<sup>1</sup> UNESCO, November 2018, ‘Decision of the Intergovernmental Committee: 13.COM 8’, <https://ich.unesco.org/en/Decisions/13.COM/8>.

<sup>2</sup> The Wire, 13 July 2017, ‘Will Not Forcibly Relocate Residents From Tibet Area Declared UNESCO Heritage Site: China’, <https://thewire.in/external-affairs/china-tibet-unesco-hoh-xil>.

<sup>3</sup> Yonten Nyima, 1 November 2019, ‘Review of Tibetan Pastoralists and Development: Negotiating the Future of Grassland Livelihoods edited by Andreas Gruschke and Ingo Breuer’, *Pastoralism* 9, 17 (2019), <https://pastoralismjournal.springeropen.com/articles/10.1186/s13570-019-0154-8>.



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Image 1: Tibetan antelope in Hoh Xil nature reserve



Source: Global Times, 4 September 2020, 'Unauthorized entry to Hoh banned for safety and ecological concerns', <https://www.globaltimes.cn/page/202009/1199920.shtml?id=11>.

### **Hoh Xil**

Hoh Xil Nature reserve, located in Yushu County, Qinghai Province is a historically and culturally Tibetan region about the size of Switzerland. The site was recognized as a natural heritage site due its exceptional natural beauty and its exceptional level of endemism. More than one third of the plant species, and all the plant-eating mammals in Hoh Xil are only found on the plateau, and nowhere else in the world.<sup>4</sup> Some of the unique animals include the Tibetan antelope, wild yak, Tibetan wild ass, and Tibetan gazelle. Forty per cent of the world's Tibetan antelope and up to 50% of the world's wild yak depend on the property. The site also conserves the habitats and natural processes of the complete life cycle of the Tibetan antelope.

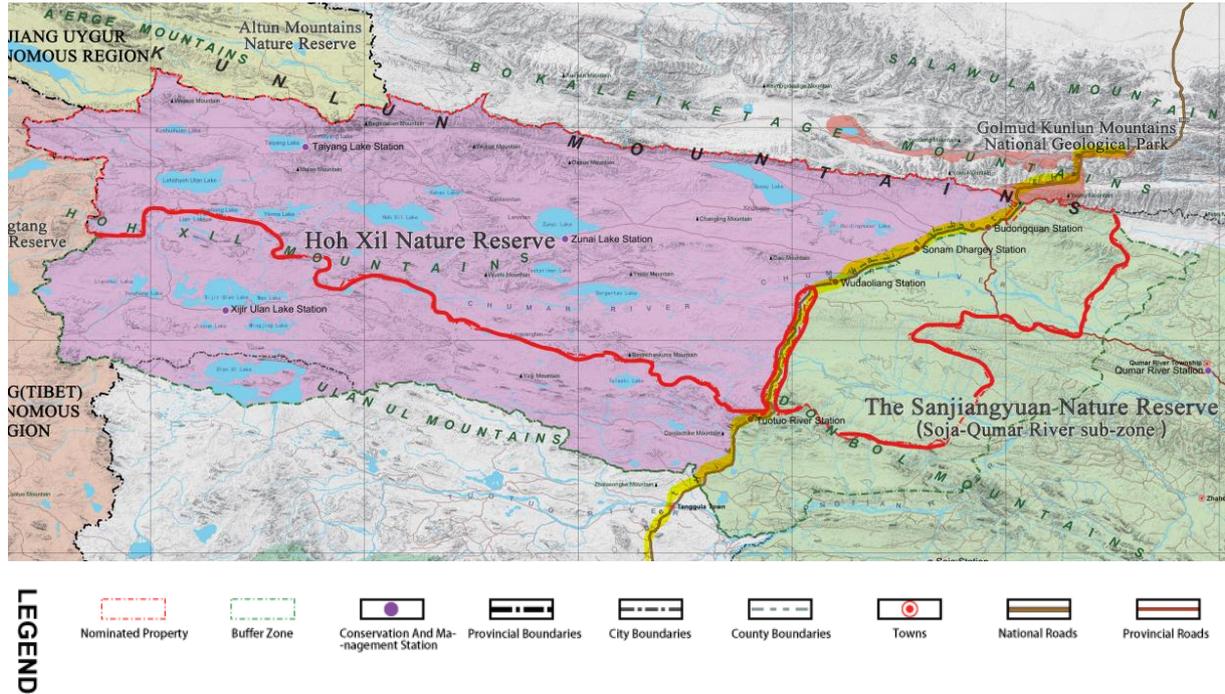
The Hoh Xil nature reserve is notably sandwiched between two larger and more well-known protected areas: the Changtang nature reserve and Sanjiangyuan (three rivers source) national park. The UNESCO protected site notably extends to include a small western component of the Sanjiangyuan national park, so that the entirety of the Tibetan antelopes' migration and calving activities can be captured. Despite this attempt to achieve coherence within the site, the migration path of the Tibetan antelope is directly cut through by the Qinghai-Tibet railway and highway. The UNESCO buffer zone boundaries are curiously set around sections of the Qinghai-Tibet transport corridor within the property, as is highlighted in red line in image 2 below.

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<sup>4</sup>IUCN World Heritage Outlook, 1 December 2020, 'Qinghai Hoh Xil – 2020 Conservation Outlook Assessment', <https://worldheritageoutlook.iucn.org/explore-sites/wdpaid/555624859>.



Image 2: Hoh Xil Nature reserve and neighbouring protected areas



Source: UNESCO Hoh Xil, 2017, 'Figure 1.e-4: The nominated property in relation to neighboring protected areas', <https://whc.unesco.org/document/155678>, page 4.

### Hoh Xil's role as a 'conservation model' in China's National Parks System

In 2017 China announced plans to establish a new national park system managed by the state. The plan created a network of 10 new pilot national parks across the country covering 222,900 sq km, about the size of Great Britain.<sup>5</sup> Although Hoh Xil is not featured in the pilot program, the neighboring Sanjiangyuan Nature Reserve is.<sup>6</sup> The conservation practices employed in Hoh Xil and indirectly 'approved' by UNESCO will become the standard for conservation management in other national parks. For example, the IUCN 2020 World Heritage Assessment of Hoh Xil lamented "the little evidence of local community involvement in the formation of the management plan", adding "what involvement there was deemed 'limited and unstructured'."<sup>7</sup> How UNESCO reviews the management of Hoh Xil is important, as we know of no other mechanism in China, and in particular Tibet, where civil society can meaningfully contribute to and participate in the decision-making process of conservation management.

<sup>5</sup> Kyle Oberman, 22 May 2020, 'China's attempt to create the world's largest national park system', SupChina, <https://supchina.com/2020/05/22/chinas-attempt-to-create-the-worlds-largest-national-park-system/>.

<sup>6</sup> The pilot national park system: Sanjiangyuan (Three-River-Source) National Park, Northeast China Tiger and Leopard National Park, Giant Panda National Park, Qilian Mountain National Park, Hainan Tropical Rainforest National Park, Wuyishan National Park, Shennongjia National Park, Pudacuo National Park, Qianjiangyuan National Park, and Nashan National Park.

<sup>7</sup> Op. Cit., IUCN World Heritage Outlook, 1 December 2020, 'Qinghai Hoh Xil – 2020 Conservation Outlook Assessment'.



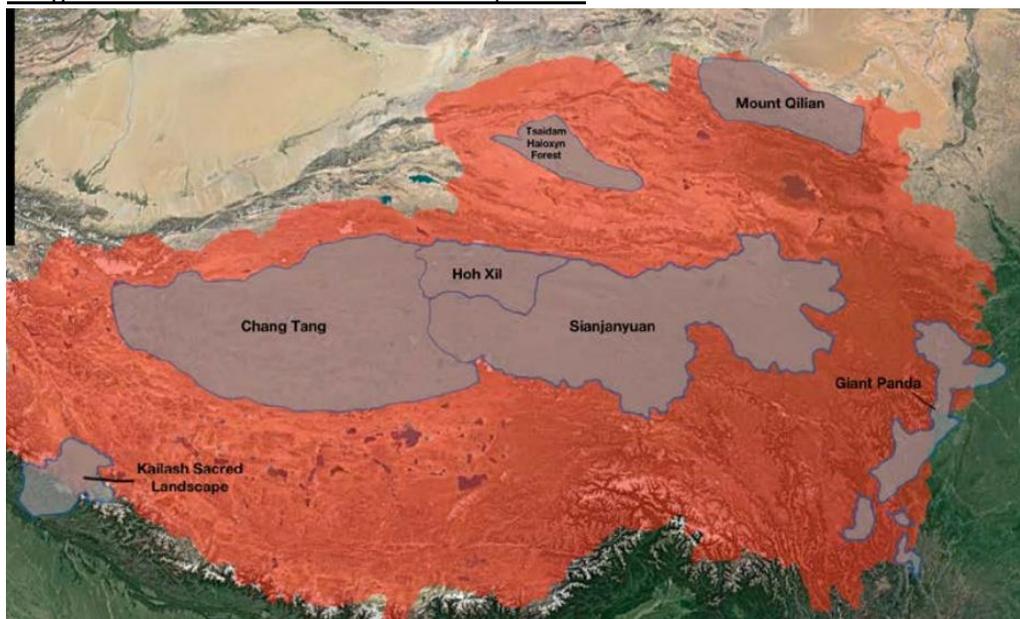
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## The 'Third Pole National Park': Turning Tibet into a protected site for conservation and tourism

On the Tibetan Plateau, a series of protected areas have also been established. While these areas have not been centralized under the national government, there appears to be plans to create a so-called 'Third Pole National Park' made up of initially five national parks that will turn Tibet into a protected site for conservation and tourism. The new national parks are set to be located in the Qomolangma (Mount Everest) area, the Bome and Medog counties where the Yarlung Tsangpo begins its descent into India, the Zanda Earth Forest (Ngari Prefecture), the Changtang Plateau, and Serling Tso (Tibet's largest lake).<sup>8</sup>

Currently, the protected areas inside Tibet cover at least one third of the Tibetan Plateau and includes the Qilian Mountains National Park, Giant Panda National Park, Changtang Nature Reserve, Hoh Xil nature reserve, Sanjiangyuan national park, Kailash Sacred landscape, Tsaidam basin, and the three Parallel Rivers. Some of these protected areas are illustrated in image 3.

Image 3: Protected areas on the Tibetan plateau



Source: Australia Tibet Council, June 2019, 'An iron fist in a green glove: emptying pastoral Tibet with China's National Parks', [https://www.atc.org.au/wp-content/uploads/2019/06/An-Iron-Fist-in-a-Green-Glove\\_online.pdf](https://www.atc.org.au/wp-content/uploads/2019/06/An-Iron-Fist-in-a-Green-Glove_online.pdf).

### Threats to the natural heritage site

At the outset of Hoh Xil's inscription, the International Union for the Conservation of Nature (IUCN) identified climate change, infrastructure and tourism, fencing and pest control as threats to the heritage site.<sup>9</sup> The advisory group's most recent 2020 Conservation Outlook Assessment of the site found the threats remain and their cumulative effects now pose a high threat to the site's universal value.<sup>10</sup>

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<sup>8</sup> Zhang Zhihao and Cui Jia, 12 March 2019, 'New national parks in Tibet to benefit nature, tourism', China Daily, <http://www.chinadaily.com.cn/a/201903/12/WS5c87062ea3106c65c34ee0e0.html>.

<sup>9</sup> International Union for Conservation of Nature (IUCN), May 2017, 'World Heritage Nomination -IUCN Technical Evaluation', <https://whc.unesco.org/document/159741>, pages 35-37.

<sup>10</sup> Op. Cit., IUCN World Heritage Outlook, 1 December 2020, 'Qinghai Hoh Xil – 2020 Conservation Outlook Assessment'.



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In its assessment of current high-level threats of high level, the IUCN evaluation identified fencing, the poisoning of Pika species, and the habitat altering effects of climate change. It concluded "... the cumulative and interactive effects of current threats, such as climate change and linear infrastructure development including fencing, the Qinghai-Tibet high and railway, are increasingly impacting the movements of ungulates and birds, and activities linked to poorly managed agriculture could impact the aesthetic, ecosystem and biodiversity values of the property."<sup>11</sup> The evaluation added, potential threats, such as "climate change, unsustainable tourist development and high voltage overhead powerlines" are also present.

Climate change is in particular altering the habitat with rising average temperatures and precipitation causing new rivers, lakes and marshlands. Such changes to the ecosystem are affecting wildlife by blocking migration routes and calving sites, and creating new forms of dust and salt pollution.

From the list of threats, the majority are government made and can be mitigated with new policies that adapt to the local environment and consider the livelihood needs and religious practices of local residents. For example, research has shown that fencing is harmful to grassland health and runs counter to traditional communal grazing practices. Given fencing restricts migration pathways and can injure local wildlife, the policy enforcing fencing could be adjusted.

Furthermore, pest control practices, such as poisoning Pika have also been proven to be misguided, as Pika do not cause grassland degradation and are in fact keystone species providing critical ecological services in the alpine meadow ecosystem.

Other threats such as infrastructure development and expanded tourism through the migration route of the Tibetan antelope can also be mitigated by limiting traffic on the Qinghai-Tibet railway and highway corridor, or by considering alternative routes. As noted by the IUCN experts, the highway severely affects the migration route of the Tibetan antelope to and from the calving grounds, and has greater impacts than previously thought.<sup>12</sup>

### **Tourism and infrastructure development**

There is legitimate concern that tourism and therefore traffic through the nature reserve will increase. The IUCN experts have already reported an increase in highway traffic due to major infrastructure developments in Qinghai.<sup>13</sup> Commentators, such as Gabrielle Lafitte, have suggested that Hoh Xil may have been nominated for World heritage status before other more established parks, as it could more easily attract tourism with its active transport networks. Such a strategy is certainly consistent with other local governments who have adopted titles such as 'national park' and 'nature reserve' to expand their tourism sector. However, as highlighted by the anthropologist Emily Yeh, these initiatives have unfortunately prioritized high-volume tourism and lagged on active conservation management and resident inclusion.<sup>14</sup>

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<sup>11</sup> Ibid. See section on 'Overall assessment of threats'.

<sup>12</sup> Ibid.

<sup>13</sup> Ibid.

<sup>14</sup> Emily Yeh, 3 February 2014, 'Do China's nature reserves only exist on paper?', China Dialogue, <https://chinadialogue.net/en/nature/6696-do-china-s-nature-reserves-only-exist-on-paper/>.



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China's use of tourism to commodify Tibetan culture and marginalize Tibetans in their own land is not new. Such strategies have been successfully employed in the old Town of Lhasa, where the UNESCO inscribed Historical Ensemble of the Potala Palace has been modernized and made to appear more Chinese in style to serve political and economic interests. The lack of local Tibetan consultation and active participation has resulted in a loss of the cultural and universal value of the site. This trend to use UNESCO's international brand to expand tourism in Tibet is likely to continue, as China currently has 60 sites on the tentative list of heritage sites, of which four are located in Tibet: 1) Diaolou Buildings and Villages for Tibetan and Qiang Ethnic Groups, 2) Qinghai Lake, 3) Scenic and historic area of Sacred Mountains and Lakes (Ngari Prefecture, TAR), and 4) Yalong Tibet.<sup>15</sup>

## Relocation

Following concerns raised by civil society groups at the inscription of the Hoh Xil site, the Chinese state made assurances that "The Chinese government has not, is not and will not in the future do any forced evictions in the Hoh Xil nominated area".<sup>16</sup> However such assurances cannot be readily accepted, given evidence suggesting resettlement is the established practice in national parks across the Tibetan region, including the Changtang nature reserve<sup>17</sup>, Sanjiangyuan national park, Qilian Mountains National Park, and Giant Panda National Park<sup>18</sup>. For example, when asked about nomad relocation in Sanjiangyuan, the administration bureau of the Sangjiangyuan National Park told Reuters, "In principle, there is no large-scale relocation of nomads[...]. We respect the will of the herders and guide them to relocate voluntarily."<sup>19</sup> However once nomads leave, they cannot return to the core zones where human activity is restricted and livestock herding is banned.<sup>20</sup>

In the Hoh Xil site, pastoralists are gradually coerced to relocate from their grazing lands by restricting their livelihood activities. For example, in 2018, in response to an inquiry by the UN human rights experts about new rules on illegal trespassers in Hoh Xil, the Chinese government reported that it implements policies such as 'converting pastures to grassland' in the buffer zone.<sup>21</sup> This policy enforces grazing bans seasonally or for ten years and encourages pastoralists to sell their livestock. The former UN Special Rapporteur on Food, Olivier De Schutter, condemned the policy on his country visit to China in 2010, arguing herders should not "be put in a situation where they have no other options than to sell their herd and resettle."<sup>22</sup>

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<sup>15</sup> UNESCO, 30 January 2019, 'Tentative Lists', <https://whc.unesco.org/en/tentativelists/state=cn>.

<sup>16</sup> Op. Cit., The Wire, 13 July 2017, 'Will Not Forcibly Relocate Residents from Tibet Area Declared UNESCO Heritage Site: China'.

<sup>17</sup> International Campaign for Tibet, 21 June 2018, 'Mass migration program highlights contested nomads' resettlement policies in Tibet', <https://savetibet.org/mass-migration-program-highlights-contested-nomads-resettlement-policies-in-tibet/>.

<sup>18</sup> Op. Cit., Oberman, 22 May 2020, 'China's attempt to create the world's largest national park system', SupChina.

<sup>19</sup> Ryan Woo, 26 September 2019, 'As China forges ecological future, Tibetans relinquish nomadic past', Reuters, <https://www.reuters.com/article/us-china-environment-resettlement-tibeta-idUSKBN1WB0C5>.

<sup>20</sup> Ibid.

<sup>21</sup> An English translation of China's response to the communication by the Special Rapporteur in the field of cultural rights and the Special Rapporteur on the enjoyment of a safe, clean, healthy and sustainable environment (AL/CHN/16/2018) is available at UN OHCHR communications, 14 September 2018, <https://spcommreports.ohchr.org/TMResultsBase/DownloadFile?glid=34340>.

<sup>22</sup> UN Special Rapporteur on the Right to Food, 23 December 2010, 'Preliminary observations and conclusions: Mission to the People's Republic of China from 15 to 23 December 2010', <http://www.srfood.org/images/stories/pdf/officialreports/de-schutter-china-statement.pdf>, page 4.



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It is important to recognize that relocating herders or eliminating traditional livelihood practices such as grazing inextricably alters the dynamic relationship between humans and their environment.

Given China's original nomination reported 156 herders lived within the core zone and 985 herders and 250 other residents lived in the buffer zone, these residents should be accounted for. It should be taken into consideration that the actual number of herders may differ from the reported figure, and could be higher.

## Recommendations

As acknowledged by IUCN in its original 2017 advisory report, 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." As such, the "cultural and spiritual values of the area should be recognized and included in the 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".<sup>23</sup>

Furthermore, as the IUCN 2020 heritage assessment of Hoh Xil identified little evidence of local community involvement in the formation of the management plan, we recommend the following:

### 1. Review management of site through a state of conservation report.

The state of the conservation report should review:

- The renewed 2020 management plan
- A climate change monitoring and management plan
- A tourism and traffic management plan

These plans should include:

- A description of how local conservation practices account for environmental, livelihood and religious needs of the local community.
  - A description of how local residents are included in the management of the site and in the renewed 2020 management plan, including in:
    - Monitoring the effects of climate change and co-designing climate responses.
    - Managing the tangible and intangible cultural attributes of the site, such as sacred sites, traditional husbandry methods, local history and folk tales, and other intangible values embedded in the land through social practices.
  - An assessment of instruments for legal remedies offering affected communities, Tibetan nomads and herders, meaningful avenues to protect their rights with regard to measures undertaken by the authorities.
- ### 2. Do not extend the protected property boundaries to include neighbouring reserves until a standard of practice for working with local residents on managing the tangible and intangible values of the site is established and reviewed.

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<sup>23</sup> Op. Cit., IUCN, May 2017, 'World Heritage Nomination -IUCN Technical Evaluation', page 37.

